

# VOLKSWAGEN

AKTIENGESELLSCHAFT

## RESPONSIBLE RAW MATERIALS REPORT 2021

May 2022



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# 1 FOREWORD

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Dear Readers,

Sustainability is one key element of Volkswagen Group Purchasing's strategy NORTH STAR, to which we are aligning all our actions until the year 2030. Our responsibility for environmental protection and human rights due diligence – which arises from this strategy – extends across all supply chains. Considering the complexity of these supply chains, we are facing an enormous challenge.

We are eager to take on this challenge, and we have already implemented countless measures. We are motivated – not only by the desire to meet legal requirements and social expectations – but also by a desire to account for our corporate footprint and to mitigate a significant and direct impact on the environment, on society and even on single individuals around the globe.

Therefore our motto is: Sustainability at scale. We as Volkswagen Group want to reach a maximum number of companies globally with our mindset and our requirements for raw material sourcing.

On the one hand, we are setting a good example: In order to identify, assess and mitigate human rights risk and ensure responsible sourcing of raw materials we have implemented dedicated management systems. Furthermore, in March 2022 Volkswagen Group joined the IRMA Initiative, which promotes rigorous social and environmental standards for mining activities.

On the other hand, we have high expectations towards our business partners and suppliers in terms of sustainability: The non-negotiable fundament of our business relations are – for example – our Code of Conduct for Business Partners, the Sustainability Rating as well as a grievance mechanism.

We can only overcome global challenges and succeed in protecting the environment as well as human rights, if we work together with all relevant stakeholders and our business partners along the supply chain. Because I am convinced: We can only win as a team. Therefore, our promise to our suppliers is: We are by your side. We help you to improve your performance in order to meet our sustainability requirements.

How good we are at that is documented in this Responsible Raw Materials Report. I am pleased to share our actions taken in 2021 and the progress we have accomplished towards responsibly sourced raw materials so far.

I would like to thank the team who has worked on this report; coordinated on Volkswagen Group level and in direct collaboration with the brands Audi, MAN, Porsche, Scania and Volkswagen Passenger Cars. Hopefully, this report will be an inspiration: Together, we can make a difference in raw material sourcing. As one team. For all people of the world. And for generations to come.



**Murat Aksel**

Group Chief Purchasing Officer (CPO) of Volkswagen AG

## 2 EXECUTIVE SUMMARY

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**In early 2021, Volkswagen Group published its first dedicated Responsible Raw Materials Report. In the report, we detailed our methodology and activities on raw material-specific human rights supply chain due diligence (including environmental risks) implemented in 2020. The approach is in accordance with the internationally recognized framework, the OECD Due Diligence Guidance for Responsible Sourcing from Conflict-Affected and High-Risk Areas (OECD Guidance).**

The release of the report was met with positive feedback from a range of stakeholders, all of whom recognized the commitment and considerable effort that Volkswagen Group places in responsible raw material sourcing and transparent reporting. The report was also an important milestone for Volkswagen Group in meeting our commitment to be a leader in responsible and transparent raw material supply chains.

With this second report – Responsible Raw Materials Report 2021 – we are excited to share our experience in the next chapter of our responsible sourcing journey. The report covers 16 high-risk raw materials, of which raw materials for batteries in our electric vehicles (EVs) remain the priority.

There were several significant achievements over the last year. For the first time, we are pleased to be able to disclose the lists of smelters and refiners in our 3TG supply chains (see [Annex III](#)). Furthermore, we used 2021 to prepare more binding sustainability requirements for our suppliers, targeting, among others, leather and natural rubber.

In 2021, Volkswagen Group also joined the pledge for a moratorium on deep sea mining, which poses potentially severe environmental risks, and committed to exclude any raw materials linked to this mining method from our supply chains. We also joined the Global Platform for Sustainable Natural Rubber (GPSNR) and supported the development of Reporting Requirements for companies in rubber supply chains.

As an active member of Drive Sustainability, we contributed to the development and launch of the Raw Material Outlook Platform, a major resource for automotive companies and other interested stakeholders to identify risks in global raw material supply chains and find collaborative actions to manage them.

We are also particularly pleased to report positive outcomes in 2021 from our on-the-ground projects, which support local communities affected by cobalt and lithium mining in the Democratic Republic of Congo (DRC) and Chile, respectively. These projects, implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ), aim to mitigate risks associated with labor, health & safety and water conservation.

In July of 2021, the German Bundestag passed an important piece of legislation for responsible sourcing: the Act on Corporate Due Diligence Obligations in Supply Chains<sup>1</sup> (the “German Supply Chain Act” or “Act”). In anticipation of the Act coming into force in 2023, we assessed our current Raw Materials Due Diligence Management System (RMDDMS) and are encouraged by the finding that, due to our conformance with the OECD Guidance, our due diligence management system already covers all requirements for companies set out in the German legislation. But it was good to question our system and we are pleased to announce, that we will further develop our RMDDMS and reporting to make our system even better.

We are proud to report on the positive outcomes of our due diligence efforts. But we strongly believe that progress and continuous improvement only comes from identifying and addressing existing challenges over and over again. In 2021, we continued to face challenges in our efforts to gain transparency over complex global supply chains. In this context juridical necessities such as anti-trust law, data security and confidentiality agreements have to be taken into account. Additionally, we found that our toughest challenges to gain transparency often occur at a level of our supply chain with which we do not have direct contractual relationships; thus, our influence is limited. In 2022, we will continue to address these challenges and more. As many of these challenges are shared by our peers and the wider supply chain, we will also seek collaborative measures with various stakeholders.

A further priority for us in 2022 is to engage with our suppliers – from the battery cell manufacturer to the mine site – to promote responsible sourcing and mining through credible certification schemes. As a major step toward this goal, we made the decision in 2021 to join the Initiative for Responsible Mining Assurance (IRMA). In 2022, we look forward to engagement with IRMA and its members, and to leveraging the IRMA Standard to advance responsible social and environmental performance on mine sites, with an initial focus on EV battery materials.

For Volkswagen Group, the responsible sourcing journey has no finish line. We continuously review and assess our activities, and we welcome external input where to further improve. Only with this dialog and the direct contact to all stakeholders, we will reach our vision of a better world for generations to come. We therefore invite readers to follow our journey in this report and to **share your feedback**.

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<sup>1</sup> Lieferkettensorgfaltspflichtengesetz (LkSG)

### 3 OUR RAW MATERIAL DUE DILIGENCE MANAGEMENT SYSTEM

**As one of the largest automotive manufacturers in the world, the Volkswagen Group is aware that the operations of its suppliers and sub-suppliers can have a significant impact on people and planet. In compliance with our human rights due diligence process based on international best practice, the Volkswagen Group continuously conducts raw material supply chain due diligence by identifying, assessing, and mitigating actual and potential negative impacts and reporting on the results of our due diligence activities.**

This Responsible Raw Material Report 2021 summarizes the Volkswagen Group's raw materials human rights supply chain due diligence activities in accordance with the OECD Due Diligence Guidance for Responsible Sourcing from Conflict-Affected and High-Risk Areas (OECD Guidance). Covering the period between January and December 2021, the report provides insight into the scope, approach and actual implementation of activities and results for due diligence on raw materials that the Volkswagen Group considers 'priority raw materials.'

#### HOW WE SET UP OUR RMDDMS

Over recent years, the Volkswagen Group has been making continual progress in advancing transparency and improving the responsible sourcing practices of suppliers and sub-suppliers. In order to standardize and systemize our approach throughout the Group, we implemented the Raw Materials Due Diligence Management System (RMDDMS). The RMDDMS underpins the Volkswagen Group Policy on Sustainable Raw Materials,<sup>2</sup> which states our commitment to responsible and transparent business conduct along our raw material supply chains.

The RMDDMS is designed to be in conformance with the OECD Due Diligence Guidance for Responsible Business Conduct, the OECD-FAO Guidance for Responsible Agricultural Supply Chains, and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Minerals Guidance) and for the future with the Act.

In line with the OECD Minerals Guidance, the RMDDMS is overseen by a senior-level steering committee comprised of Senior Management of Sustainability from Procurement across all relevant brands and regions of the Volkswagen Group, including the Head of Global Supplier Risk and Sustainability Management of Volkswagen Group Purchasing. The steering committee meets on a quarterly

basis in a format called the "Group Staff Meeting Sustainability", where major decisions regarding the RMDDMS are made. A Working Group, which includes several qualified staff representatives from the Sustainability in Purchasing departments across Volkswagen Group's brands, including Volkswagen, Audi, Porsche, MAN, and Scania, is responsible for the coordination and implementation of the RMDDMS activities.

To ensure full ownership of implementation within a multi-raw materials due diligence system, develop in-depth expertise, and pragmatically organize the supplier relations, each of our identified priority raw materials is assigned to a Working Group representative or "Brand Lead". The Working Group meets monthly to coordinate RMDDMS activities across the materials.

#### OUR PRIORITIES AND METHODOLOGY FOR RISK MANAGEMENT

In line with the recommendation of the OECD Minerals Guidance, Volkswagen Group takes a risk-based approach to raw material supply chain due diligence. Our products can include thousands of parts made from several hundred raw materials, and we work with over 60,000 suppliers annually to build our products. The complexity of our supply chains, some of which include up to 9 tiers of suppliers, and the different levels of risk exposure across supply chains, therefore mean it is not feasible or always necessary to conduct the same level of enhanced due diligence across all raw materials. Thus, in 2020, the Group developed a methodology to select priority raw materials based on a severity assessment of potential human rights risks and the Group's leverage to influence a respective raw material supply chain.

The data for our raw material prioritization was derived from different sources. One key resource was the **Drive Sustainability/Responsible Minerals Initiative (RMI) Material Change Report**. Additionally, we evaluated data on the current and future demand for each material from the Volkswagen Group<sup>3</sup>. The results of this assessment produced a list of 16 priority raw materials in scope for the RMDDMS, which remained the same in 2021.

<sup>2</sup> This policy is available at this Microsoft Word - 2017\_Policy raw materials.docx (volkswagenag.com). The policy is currently under review and the Volkswagen Group plans to present a revised policy in 2022.

<sup>3</sup> One resource for the evaluation of potential human rights risks associated with a specific raw material supply chain was the Drive Sustainability/Responsible Minerals Initiative (RMI) Material Change Report, that is available here.

THE FOLLOWING LIST REPRESENTS THE 16 PRIORITY RAW MATERIALS FOR HUMAN RIGHTS DUE DILIGENCE IDENTIFIED BY VOLKSWAGEN GROUP:<sup>4 5</sup>

 **Battery Raw Materials**

Lithium	Cobalt	Nickel	Graphite
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 **Conflict Minerals (3TG)**

Tin	Tantalum	Tungsten	Gold
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 **Other Materials**

Aluminium 	Copper 	Leather 	Mica 
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Platinum Group Metals (PGMs) 	Rare Earth Elements (REEs) 	Rubber  	Steel 
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4 Volkswagen Group's list of priority raw materials undergoes regular review for relevance and is subject to change based on this review or in an ad hoc manner, as necessary.

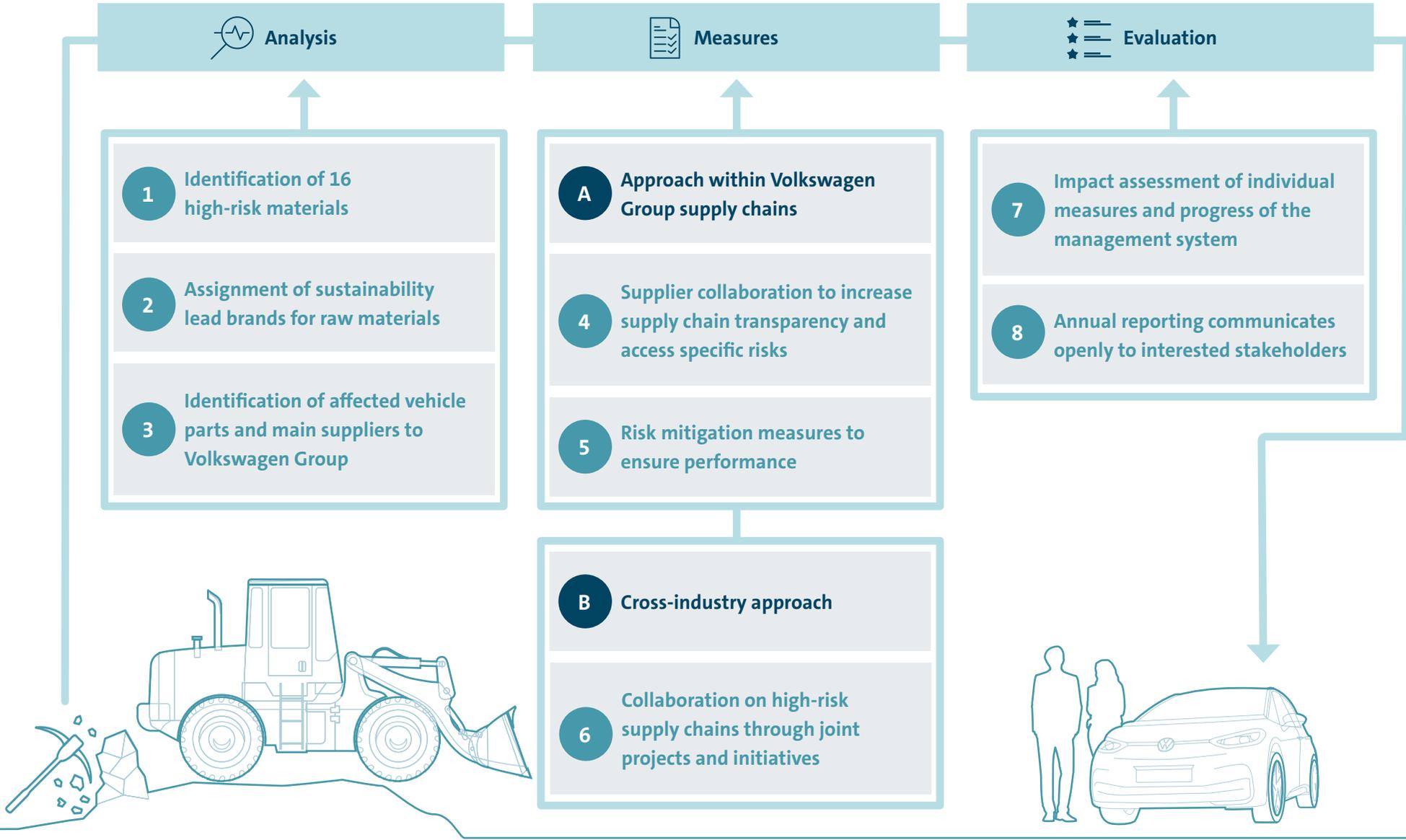
5 The "Brand Leads" for each priority raw material are as follows: battery materials (cobalt, lithium, nickel and graphite) are managed by Volkswagen; conflict minerals (tin, tantalum, tungsten and gold) are managed by Volkswagen; aluminum and copper are managed by Audi; leather and mica are managed by Porsche; platinum group metals are managed by Scania; rare Earth elements are managed by Volkswagen; rubber is managed by Volkswagen, MAN and Porsche; steel is managed by Volkswagen.

HUMAN RIGHTS RISKS DETERMINED BY VOLKSWAGEN GROUP TO BE IN SCOPE FOR THE WORK OF THE DUE DILIGENCE MANAGEMENT SYSTEM ARE:

				
<p><b>Child Labor</b></p>	<p><b>Modern Slavery</b></p>	<p><b>Systematic or widespread human rights abuses associated with the extraction, transport or trade of raw material</b></p>	<p><b>Human rights abuses committed by public or private security forces</b></p>	<p><b>Direct or indirect support to non-state armed groups or public or private security forces</b></p>
				
<p><b>Risks to workers' occupational health and safety (OHS)</b></p>	<p><b>Adverse environmental impacts (including the use of hazardous materials and chemicals; radioactive materials; potential of acid discharge to the environment; incidences of overlap with areas of conservative importance)</b></p>	<p><b>Infringement on labor rights</b></p>	<p><b>Discrimination and harassment, including against vulnerable groups</b></p>	<p><b>Threats to indigenous people and communities (including land grabbing without compensation)</b></p>

The RMDDMS covers strategic and high-risk raw material supply chains and supports the identification, assessment, and mitigation of human rights risks in these supply chains. It ensures a standardized and systematic risk-based approach, including concrete tools and methodologies, that should reduce potential and actual negative human rights impacts throughout our supply chains. Furthermore, it ensures that sourcing practices in these supply chains conform to international good practice.

THE GRAPHIC BELOW PROVIDES A VISUAL DEPICTION OF OUR OECD-ALIGNED STEP-BY-STEP APPROACH:



In 2020 and 2021, Volkswagen Group implemented different approaches<sup>6</sup> for the identification of risks in different raw material supply chains. Risk assessment and selection of initial risk mitigation efforts did begin in 2020; however, the majority of this work was carried out in 2021 and is currently ongoing and continuously evolving.

## DEVELOPMENTS OF THE RMDDMS IN 2021

Part of our RMDDMS includes regular monitoring and evaluation of the performance of our RMDDMS to ensure it remains strong and effective. In 2021, we took several key steps to further develop the system.

First, we set key performance indicators (KPIs) for the RMDDMS spanning to 2025, which are regularly reported to the steering committee. The decision to set KPIs on our management system was based on our overall objective to set a benchmark for responsible raw material sourcing in the automotive industry. In addition to the KPIs set for the management system, we also set KPIs for a majority of our priority raw materials that we aim to achieve by 2025. For our battery raw materials, for example, we aim to gain 100% transparency over the supply chain, and assure responsible supplier performance, including at the mine site-level, through ambitious battery supply chain mapping and auditing efforts.

In a major step forward for the RMDDMS, we developed internal software system that now enables us to coordinate and centrally manage all RMDDMS activities across the entire Volkswagen Group. The system allows for a more structured approach to manage reporting, record-keeping, and impact measurement of our due diligence efforts.

For internal capacity-building, we have increased our team capacity in Sustainability Management Procurement and, throughout 2021, our team has conducted 11 staff trainings for new employees in Procurement as part of the onboarding process within the Volkswagen Procurement training program.

We also proactively engaged with several external stakeholders, which largely included international NGOs focusing the protection of human rights, to collect feedback on our Responsible Raw Material Report from 2020. Through an analysis of their valuable insights, we were able to identify opportunities for improvement not only in our reporting, but also in our overall RMDDMS activities.

### BOX 1

#### GRIEVANCE PROCESS

An important part of due diligence in supply chain management is an effective Supply Chain Grievance Mechanism. For Volkswagen Group, our grievance mechanism enables us to investigate upcoming suspicions brought to our attention relating to breaches of our sustainability requirements, including human rights violations along the supply chain. Information channels include our website **(Whistleblower System)** [volkswagenag.com](https://www.volkswagenag.com), two e-mail addresses ([io@volkswagen.de](mailto:io@volkswagen.de)) and ([sustainability@vwgroupsupply.com](mailto:sustainability@vwgroupsupply.com)) as well as an anonymized channel (**Introduction**) that is accessible to all potentially affected stakeholders, including employees of suppliers, civil society actors or representatives of communities in the immediate proximity to our production sites. The processing of cases is described in a binding directive, which is guided by the Group and implemented together with the brands and regions of the Volkswagen Group. For identified violations, mitigation measures are taken. For particularly serious infringements the termination of the business relationship is also possible. In addition, employees and external stakeholders are also able to report potential violations of our rules by our suppliers to the employee representatives of the Volkswagen Group. This applies to both potential violations by our direct suppliers as well as by sub-suppliers. Another point of contact is external ombudspersons, with more information available here **(Ombudspersons of Volkswagen Group)**.

In 2021, we received 4 grievances related to raw materials which covered the risk areas of infringement on labor rights; discrimination and harassment, including against vulnerable groups; workers' occupational health and safety (OHS); and environmental issues. The grievances were geographically located in Africa, Asia and Europe. In most cases, grievances that we receive occur at a supply chain level where we do not have direct contracts with the supplier, and therefore have limited leverage. Where we do confirm that the case occurred within our supply chain, we either invite the supplier in question for talks to respond to the grievance or reach out through our direct suppliers. The next steps are then determined on a case-by-case basis.

<sup>6</sup> Risk identification approaches included: Audits up to the upstream level, Supply chain mappings, Analysis of suppliers' and sub-suppliers' self-disclosures; Examination of risk analyses from industry initiatives; Analysis of returned Volkswagen Group questionnaire and survey results; Monitoring of media reports; Stakeholder engagement (including civil society, investors and government organizations); A review of grievances received through the Volkswagen Group Grievance Mechanism; In-country investigation

# 4 OUR RAW MATERIAL DUE DILIGENCE MANAGEMENT SYSTEM IN ACTION

## RAW MATERIAL SPECIFIC HIGHLIGHTS FROM 2021:



Published list of 3TG smelters, refiners and countries of origin for the first time



Started using Artificial Intelligence (AI) to monitor sustainability risks (Prewave)



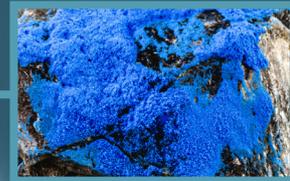
Joined the pledge for a moratorium on deep sea mining



Made decision to become members of the Initiative for Responsible Mining Assurance (IRMA)



Made decision to join Global Platform for Sustainable Natural Rubber (GPSNR)



Performed first comprehensive sustainability audit on a large-scale cobalt mine site in the DRC



Over 50% of audited cobalt suppliers received and agreed Corrective Action Plans (CAPs) through our battery supplier mapping and auditing program



Launched Drive Sustainability's Raw Material Outlook, with in-depth risk assessment for 10 critical materials



Drafted binding supplier requirements for responsible sourcing practices at tanneries for all leather products across across the entire Volkswagen Group



Observed initial positive outcomes from on-the-ground projects in DRC and Chile

## ACTIVITIES AND OUTCOMES OF RMDDMS IMPLEMENTATION IN 2021

As stated previously, we are pleased to be able to disclose, for the first time, a list of smelters, refiners, and countries of origin 3TG supply chains. This is a significant step and one which was made possible through direct engagement with our 3TG suppliers.

In 2021, we also worked with a cobalt mining company to pilot a comprehensive sustainability audit against the **CERA 4in1 standard**, which was conducted on a large-scale cobalt mine site in the DRC. Furthermore, we continued progress on our mapping and audit program for OECD-aligned responsible sourcing in close cooperation with two major battery suppliers. By the end of 2021, over 200 of our cobalt suppliers had been identified, with 25 of those prioritized and audited by external audit and advisory firm, RCS Global Group, through this program. Of those suppliers that had been audited, we were able to agree upon Corrective Action Plans (CAPs) with over 50% and we continue to monitor their progress and work toward agreement on CAPs with the other suppliers.

In 2021, Volkswagen Group also joined the pledge for a moratorium on deep sea mining, which poses potentially severe environmental risks, and committed to exclude any raw materials linked to this mining method from our supply chains.

In our leather supply chains, we revised our contractual supplier requirements in 2021. Starting in 2022, all tanneries supplying leather products across the Volkswagen Group will be required to demonstrate responsible sourcing practices.

At the multi-stakeholder level, we joined the Global Platform for Sustainable Natural Rubber (GPSNR) and supported the development of the Reporting Requirements for companies in rubber supply chains. As a member of the Drive Sustainability partnership, we also contributed to the development and launch of the Raw Material Outlook Platform, a major resource for automotive companies to identify and assess risks in their raw material supply chains and to identify collaborative actions to manage them (for more details on how this contributes to our due diligence approach, see **Box 2**). Finally, we made the decision to join IRMA in 2021, with the aim to engage with the multi-stakeholder initiative and to progressively use the IRMA Standard as a requirement for our supply chains – first prioritizing our battery material supply chains (read more in **Box 3**).

We are committed to establishing relationships and building supplier capacity for responsible sourcing. Therefore, we have provided trainings for suppliers on OECD-aligned supply chain due diligence through our RMDDMS. In 2021, suppliers have been engaged on the topic of responsible raw material sourcing in 2 web-based trainings. In total, we had more than 7,000 suppliers participating in these sessions.

We are particularly pleased to report on the positive outcomes in 2021 from our on-the-ground projects, which support local communities affected by cobalt and lithium mining in the Democratic Republic of Congo and Chile respectively. Our on-the-ground projects, implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ), aim to mitigate risks associated with labor, health and safety, and water conservation.

In order to monitor supply chain risks, we have implemented an intelligent sustainability radar for the supply chain: based on an artificial intelligence (AI) algorithm the established monitoring system is capable of identifying and analyzing supplier-related news from publicly available media and social networks in more than 50 languages and over 150 countries (**Prewave Porsche, Audi and Volkswagen use Artificial Intelligence to minimize sustainability risks**). If there is any indication of a sustainability risk in the supply chain, the lead brands are notified.

For the raw material-specific implementation of our RMDDMS, we continued our approaches from 2020 to identify and assess risks and were able to advance this work, with an emphasis on risk mitigation in 2021. The following section provides an in-depth look into these supply chain due diligence activities and results for each of our 16 priority raw materials.

**BOX 2**

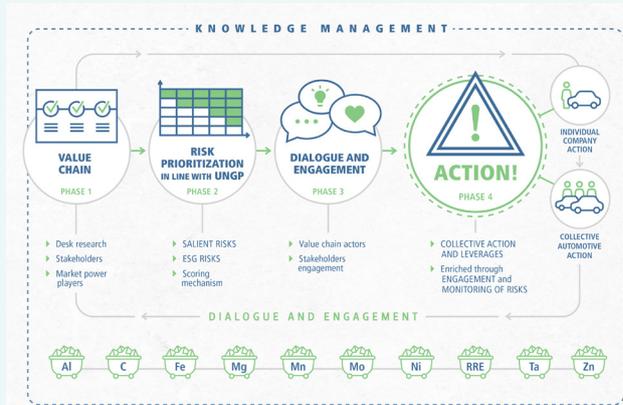
**MANAGING RISKS WITH THE 2021 DRIVE SUSTAINABILITY RAW MATERIAL OUTLOOK**



**Drive Sustainability** is an automotive industry initiative of responsible automakers with the shared goal to promote a sustainable, responsible and circular automotive value chain. It is facilitated by CSR Europe, with 12 members representing some of the world’s largest automotive companies.

As a founding member and lead partner of Drive Sustainability, we co-chair the Raw Material Working Group, through which we contributed to the development and launch of the Raw Material Outlook platform (**RAW MATERIAL OUTLOOK PLATFORM**), launched late in 2021. It is an update from Drive Sustainability’s Material Change Report, which had a large impact in the industry when it was published in 2018.

The Raw Material Outlook is a platform that collects and analyses information on raw material risks in the automotive value chain, including an in-depth assessment of human rights risks across 10 critical materials: aluminium/bauxite, graphite, iron ore, magnesium, manganese, molybdenum, nickel, RREs, tantalum and zinc. Other raw materials will be added at a later stage.



The Raw Material Outlook features across several of our raw material-specific approaches to due diligence, as seen in the next section of this report. The data provided through the platform plays an important role in our approach to risk identification and assessment. Furthermore, it provides a channel for engagement with other companies and stakeholders to identify collaborative actions for managing and mitigating risks in these supply chains.

**BOX 3**

**ADOPTING IRMA ACROSS BATTERY METAL SUPPLY CHAINS**



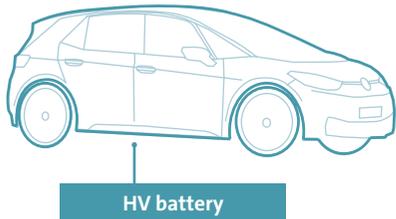
In March 2022, Volkswagen Group officially became a member of **IRMA - The Initiative for Responsible Mining Assurance**. We are looking forward to engage with the initiative and progressively using the certification on our supply chains – with a priority to our battery supply chains.

Founded in 2006, IRMA is a coalition of key stakeholders in mining and raw material supply chain due diligence that sets out to raise the bar for socially and environmentally responsible mining. After a multi-year process to develop a comprehensive

set of good practice expectations for mine sites, IRMA released its **Standard for Responsible Mining** in June 2018. Its development and implementation are overseen by a multi-stakeholder board, including representation from the mining industry, purchasing companies, affected communities, civil society and organized labor groups. The IRMA Standard is regarded as one of the most credible and ambitious standards for responsible mining.



## KEY APPLICATION



## OUR APPROACH: RISK IDENTIFICATION AND RISK ASSESSMENT RESULTS

The Volkswagen Group does not source any of the battery raw materials – lithium, cobalt, nickel or graphite – directly. Therefore, we work closely with battery cell producers to engage with the upstream sector, increase supply chain transparency and make sure that battery raw minerals are produced and sourced responsibly. Since 2020, we have incorporated binding requirements into all new battery supply contracts to disclose upstream information up to the mine. In 2021, we continued our direct engagement with battery cell producers to collect this data through supply chain mapping questionnaires, analyze and assess it to identify responsible sourcing risks.

## KEY MATERIAL-SPECIFIC RISKS



Adverse environmental impacts



Risks to workers' occupational health and safety

We identified the following countries of origin in our supply chain: **Chile and Australia.**



In 2020, Volkswagen Group commissioned an independent in-depth on-the-ground assessment. The assessment was conducted by international and regional experts via interviews with stakeholders in Chile, including mining communities and indigenous peoples focusing on hydrological, as well as questions around community engagement. Additionally, the Group conducted targeted outreach to two lithium producers in Chile and an in-country investigation to Chile in January 2020. Based on these activities, we assessed that the risk of adverse environmental impacts and/or threats to indigenous people and communities is moderate to low.

Furthermore since 2020, the Group has also been involved in the “National

Action Plan for the Implementation of the UN Guiding Principles on Business and Human Rights” (NAP), Sector Dialogue Automotive, Working Group 2 “Respecting Human Rights in Natural Resource Value Chains and Supply Networks.” In 2021, sustainability in the lithium supply chain was among the priority topics of the Sector Dialogue. Furthermore, one of the Sector Dialogue’s achievements was a baseline study of human rights risks in lithium production based on an analysis of major lithium producing countries. Based on this work the working group 2 developed recommendations for responsible practices at the mining level as well as for downstream companies.

## RISK MITIGATION ACTIONS TAKEN: FACTS AND FIGURES

In 2020, along with several industry partners, we initiated the Responsible Lithium Partnership in Chile. Through the initiative, we were able to facilitate dialogue and collect input on challenges faced by affected local stakeholders. See **Box 7** in this report for more details on the activities and outcomes of the Responsible Lithium Partnership in 2021.

In 2021, we continued to advance our direct engagement with key upstream actors in Chile to encourage third-party responsible sourcing audits. We were pleased that our engagement successfully encouraged 2 local mines to commit to certification against the IRMA Standard.

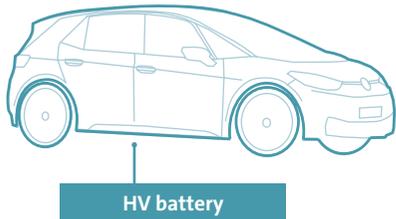
## OUTLOOK 2022

In the coming years, we aim to engage with further stakeholder groups along the battery value chain and promote certifications against credible industry standards. As new members of IRMA, we plan to progressively apply the standard within our EV battery supply chain throughout 2022. *Also in 2022, as the Responsible Lithium Partnership enters the next stage, we will continue supporting local stakeholders on addressing water sustainability issues.*



Co  
COBALT

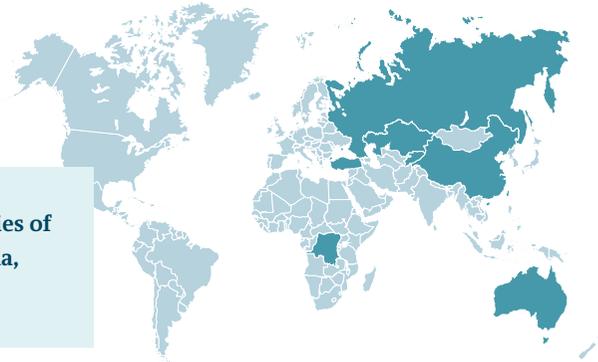
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## OUR APPROACH: RISK IDENTIFICATION AND RISK ASSESSMENT RESULTS

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We identified the following countries of origin in our supply chain: Australia, China, DR Congo, Russia, Turkey.



Given the complexity of the cobalt supply chains, yet relatively high leverage Volkswagen Group has as a downstream customer, we chose the following approaches to risk identification and assessment:

- We continued working closely with battery suppliers to collect information on the origin of raw materials. This process has been facilitated by contractual requirements for all new suppliers since 2020 to regularly disclose details of sub-suppliers up to the mine site. By the end of 2021, 4 suppliers had disclosed this information to us.
- Since 2019, Volkswagen Group launched a mapping and audit program for responsible sourcing in close cooperation with two major battery suppliers. The results of the initial assessments defined further audit activities in 2021, which were focused on high-volume battery and automotive projects and high-risk suppliers, as well as on monitoring corrective actions.
- Through the global mapping and auditing program, over 200 suppliers have been identified. In a risk-based approach, we prioritized 25 suppliers, including battery and cathode manufacturers, refiners and treatment units, to undergo OECD-aligned responsible sourcing audits by the end of 2021. No critical breaches of human rights risks were identified through the audits; however, suppliers are encouraged to improve their policies and systems for preventing and managing risks. In terms of their alignment to OECD Mineral Guidance, the majority of suppliers performed better in demonstrating a due diligence

## KEY MATERIAL-SPECIFIC RISKS



Child Labor



Modern Slavery



Systematic or widespread human rights abuses



Human rights abuses committed by public or private security forces



Support to non-state armed groups or public or private security forces



Risks to workers' occupational health and safety



Adverse environmental impacts



Infringement on labor rights



Discrimination and harassment

management system exists, though there were common challenges across all tiers, namely that they lacked a chain of custody and transparency system over the supply chain. The audited suppliers also demonstrated challenges on implementation of their due diligence systems, particularly on risk assessment and their process to ensure third-party due diligence of their suppliers.

- Volkswagen has been part of the Advisory Board to a new responsible mining standard, CERA4in1. The first pilot audit against the standard was conducted at a large-scale cobalt mine (LSM) in the DRC in October 2021 and the cooperation with the auditee is well underway. The initial audit results were overall positive in terms of community relations, accommodation and site security. However, environmental and OHS risks, such as inadequate risk and safety management, inadequate handling of hazardous material, and inadequate waste assessment and management have been identified at the mine site. This was used to align on corrective actions (see below).

- We have actively supported industry-wide sustainability efforts via several sector initiatives and partnerships, such as the Responsible Minerals Initiative (RMI), the Global Battery Alliance (GBA) and Drive Sustainability. One major accomplishment of the GBA Human Rights and Child Labor Working Group was the development and initial testing of a Child Labor Index (CLI), a tool to measure performance of companies in the battery supply chain on their efforts to address and support the elimination of child labor. The CLI is a first step to standardize the architecture and criteria for tracking performance on human rights indicators for the GBA's Battery Passport. The CLI testing stage will continue in 2022 and will be piloted following stakeholder consultations.

- As a source of knowledge, we continued media screening and stakeholder engagement. For example, in 2021, we met with RAID, an NGO that investigates human rights risks in the mining industry in the Democratic Republic of Congo, and with Save the Children, the largest independent children's rights organization in the world, which is dedicated to the protection and improvement of children's lives worldwide.

**RISK MITIGATION ACTIONS TAKEN:  
FACTS AND FIGURES**

Based on the nature of identified risks and supply chain analysis, we continued to engage directly with major battery suppliers as part of the mitigation activities in 2021. Through regular meetings, we have been able to track the progress of our global audit program and adjust it depending on the audit results.

Following audits of the 25 suppliers through this program in 2021, we were able to agree on corrective action plans (CAPs) with over 50% of those auditees and continue to monitor progress. Measures included, for example, increasing transparency over mineral supply chains through identification of all refiners in its supply chain, establishing a due diligence process to validate the refiner information received from first tier suppliers, as well as revising the scope and methodology for the evaluation process to periodically assess risks in the suppliers' due diligence programs. As many of the audits were conducted later in 2021, the other suppliers are still in the process of developing and agreeing upon their CAPs.

In regard to the successful CERA audit for risk mitigation, concrete measures were developed for the mine site in a corrective action plan (CAP), which included increase of safety trainings and signs, maintaining minimum distance to operating machinery (to not be caught by moving and rotating parts),

updates on vehicle and machinery maintenance, improvements on waste assessment and management, confinement of on-site construction sites, installment of safety nets to prevent falling into liquids, and construction of bund walls to prevent spillage of liquids.

The audit findings have been addressed in the project and a CAP is currently being finalized. Although the pilot has not been completed at the time of report publication, Volkswagen welcomes the initial improvements implemented at the mine site.

Lastly, in 2021 Volkswagen Group engaged in Cobalt for Development ("C4D"), an on-the-ground project in the Democratic Republic of Congo. For more details on the project, please see **Box 6** in this report or visit Cobalt for Development (C4D) - Towards responsible artisanal cobalt mining in the **DR Congo**.

**OUTLOOK 2022**

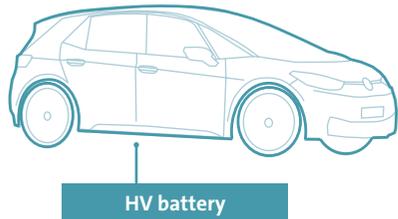
We plan to continue and expand our supply chain mapping and audit program in 2022.

*As new members of IRMA, we plan to progressively apply the standard within our EV battery supply chain.*



Ni  
NICKEL

## KEY APPLICATION

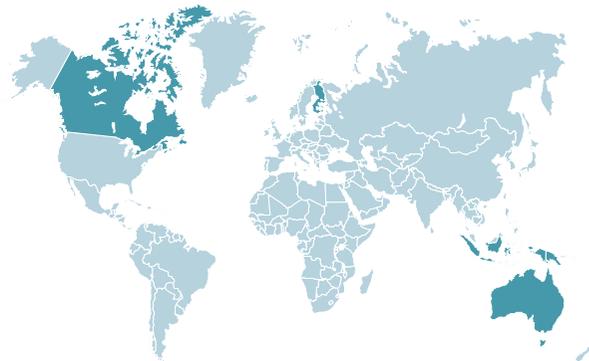


## OUR APPROACH: RISK IDENTIFICATION AND RISK ASSESSMENT RESULTS

The Volkswagen Group does not source any of the battery raw materials – lithium, cobalt, nickel or graphite – directly. Therefore, we work closely with battery cell producers to engage with the upstream sector, increase supply chain transparency and make sure that battery raw minerals are produced and sourced responsibly. Since 2020, we have incorporated binding requirements into all new battery supply contracts to disclose upstream information up to the mine. In 2021, we continued our direct engagement with battery cell producers to collect this data through supply chain mapping questionnaires, analyze and assess it to identify responsible sourcing risks.

Through media screening and review of sector studies, we are monitoring nickel-specific risks in the world's leading nickel producing countries, such as Brazil, China, Guatemala, Indonesia, Madagascar, Papua New Guinea and Russia.

We identified the following countries of origin in our nickel supply chain: Australia, Canada, Finland, Indonesia, New Caledonia and Papua New Guinea.



Nickel is one of the critical raw materials covered in the Drive Sustainability Raw Material Outlook, which provides data for risk identification and assessment of the material in our supply chains. In 2021, we began reviewing this data and will continue to assess it in 2022.

## RISK MITIGATION ACTIONS TAKEN: FACTS AND FIGURES

We have been in direct dialogue with several major nickel mining companies and conducted 3 sustainability workshops to assess these companies' readiness against our responsible sourcing requirements. Our partners have been open to cooperation and information sharing, showing a high level of risk awareness and a good understanding of responsible sourcing topics. Resulting from our extensive risk assessment on nickel tailings treatment as well as deep sea mining, the Volkswagen Group as well as Scania have joined the Pledge against Deep Sea Mining in 2021. For more information, please see **Box 5** in this report or visit **No Deep Seabed Mining**.

## OUTLOOK 2022

In 2022, we will continue implementing and expanding our supply chain mapping and audit program in close cooperation with our major battery suppliers. *As new members of IRMA, we plan to progressively apply the standard within our EV battery supply chain throughout 2022.*

## KEY MATERIAL-SPECIFIC RISKS



Child Labor



Modern Slavery



Systematic or widespread human rights abuses



Human rights abuses committed by public or private security forces



Support to non-state armed groups or public or private security forces



Risks to workers' occupational health and safety



Adverse environmental impacts



Infringement on labor rights



Discrimination and harassment

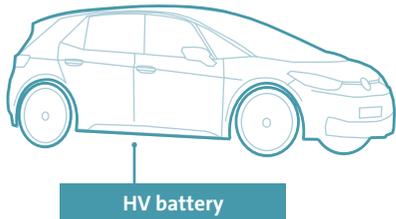


Threats to indigenous people and communities



C  
CARBON

## KEY APPLICATION



### OUR APPROACH: RISK IDENTIFICATION AND RISK ASSESSMENT RESULTS

The Volkswagen Group does not source any of the battery raw materials – lithium, cobalt, nickel or graphite – directly. Therefore, we work closely with battery cell producers to engage with the upstream sector, increase supply chain transparency and make sure that battery raw minerals are produced and sourced responsibly. Since 2020, we have incorporated binding requirements into all new battery supply contracts to disclose upstream information up to the mine. In 2021, we continued our direct engagement with battery cell producers to collect this data through supply chain mapping questionnaires, analyze and assess it to identify responsible sourcing risks.

In 2021, Volkswagen Group planned to conduct an on-the-ground risk assessment on a graphite supplier based in China. However, due to Covid-19 related health and travel restrictions, an on-site assessment was not possible. The Group will revisit plans for an on-the-ground assessment in the future, when normal travel resumes.

*Graphite is one of the critical raw materials covered in the Drive Sustainability Raw Material Outlook, which provides data for risk identification and assessment of the material in our supply chains. In 2021, we began reviewing this data and will continue to assess it in 2022.*

### RISK MITIGATION ACTIONS TAKEN: FACTS AND FIGURES

*Risk assessment for graphite supply chains is still ongoing.*

### OUTLOOK 2022

In 2022, we will continue implementing and expanding our supply chain mapping program in close cooperation with our major battery suppliers.

## KEY MATERIAL-SPECIFIC RISKS



Human rights abuses committed by public or private security forces



Risks to workers' occupational health and safety



Adverse environmental impacts



Infringement on labor rights

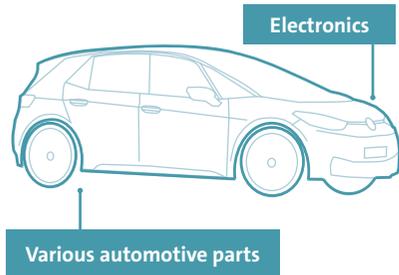


Threats to indigenous people and communities

# TIN, TANTALUM, TUNGSTEN AND GOLD (3TG) CONFLICT MINERALS



## KEY APPLICATION



## OUR APPROACH: RISK IDENTIFICATION AND RISK ASSESSMENT RESULTS

3TG supply chains are highly complex and involve a large number of actors. Volkswagen Group conducted supplier data collection using the Responsible Minerals Initiative's (RMI) Conflict Minerals Reporting Templates (CMRTs).

In pursuit of our continued due diligence process we expanded upon both our management systems approach and supplier outreach in 2021. Having reviewed our previous approach for collecting information, we could significantly improve the quality of traceability data received from suppliers and better manage the high number of third parties in the 3TG supply chain by implementing a campaign management which incorporates a third-party database.

Overall 1565 suppliers manufacturing 3TG-containing parts were identified and approached for data collection.



As a result of this campaign, we determined 340 smelters. Nearly 69% of which were RMAP-conformant as of 2021. Through a collective of industry outreach, we have identified Country of Origin data for over 80% of our total smelters. Lists identifying smelters and countries of origin can be found in the annex.

## KEY MATERIAL-SPECIFIC RISKS



Child Labor



Modern Slavery



Systematic or widespread human rights abuses



Human rights abuses committed by public or private security forces



Support to non-state armed groups or public or private security forces



Risks to workers' occupational health and safety



Adverse environmental impacts



Infringement on labor rights



Discrimination and harassment



Threats to indigenous people and communities

# TIN, TANTALUM, TUNGSTEN AND GOLD (3TG) CONFLICT MINERALS

## RISK MITIGATION ACTIONS TAKEN: FACTS AND FIGURES

Based on the risk assessment results to date, the Group selected direct supplier engagement and capacity building as the most suitable mitigation measure at this stage.

**In 2021, Volkswagen Group conducted trainings with 72 suppliers on regulatory frameworks, international standards and our responsible sourcing commitments regarding Conflict Minerals.**



**The training also included practical guidance on conducting supplier due diligence and using the CMRT.**

While we have made headway in collecting supply chain information and identifying critical smelters in Volkswagen Group's supply chain, more time and resources are needed to achieve better traceability in the highly complex 3TG supply chain. The task becomes even more complicated considering the high number of affected automotive parts.

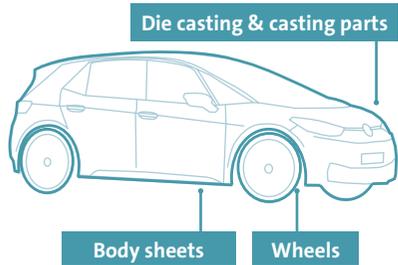
*By engaging in industry initiatives, such as the Responsible Minerals Initiative (RMI), Drive Sustainability and the Responsible Supply Chain Initiative (RSCI), Volkswagen Group promotes meaningful exchange and cooperation among the stakeholders to ultimately tackle these challenges and foster responsible sourcing practices globally.*

### Outlook 2022

In 2022, we will continue working on increasing transparency along the 3TG value chain. Once sufficient data is collected, we will begin direct engagement with the most critical tier-1 suppliers based on the smelter risk profile and/or the quantity of 3TG materials used in their products.



## KEY APPLICATION



## OUR APPROACH: RISK IDENTIFICATION AND RISK ASSESSMENT RESULTS

Volkswagen Group's approach focused on engagement in the Aluminium Stewardship Initiative (ASI), a global multi-stakeholder standard-setting organization focused on responsible production, sourcing and stewardship of aluminum.

**By the end of 2021, ASI had 108 members involved in the production and transformation of aluminum, of which 70 had been audited against and received certification for the ASI Performance Standard.**



## RISK MITIGATION ACTIONS TAKEN: FACTS AND FIGURES

As early as 2018, Audi AG, as a member of Volkswagen Group became the first car manufacturer to be awarded the Performance Standard certificate from the ASI (recertified in 2021) and was certified against the ASI Chain of Custody Standard in 2020. As a result, Audi AG supports the responsible sourcing, enhanced recycling and material stewardship of aluminum. This certification applies to the German facilities and will be continuously rolled out over further entities, brands, new vehicle projects and further aluminum products.

The Group hosted two internal training sessions for the raw material working group, with focus on sustainable aluminum, ASI certification, process adaption and an exchange with the CEO of ASI. As a result of this internal capacity building, the purchasing of ASI-certified material was rolled out in a pilot to another Volkswagen brand with approximately 10,000 tons of ASI COC-certified material.

## KEY MATERIAL-SPECIFIC RISKS



Child labor



Modern slavery



Systematic or widespread human rights abuses



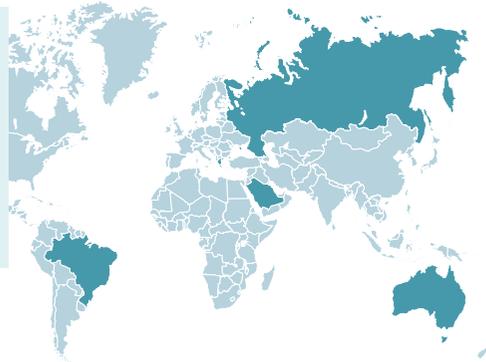
Adverse environmental impacts



Threats to indigenous people and communities

Based on the information gathered via audits, stakeholder engagement and research, the **ASI provides valuable insights** for our risk identification and assessment in the aluminum supply chain.

**Countries of origin of ASI-Certified Bauxite production include Australia, Brazil, Greece, Russia and Saudi Arabia.**

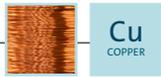


*Aluminum is one of the critical raw materials covered in the Drive Sustainability Raw Material Outlook, which provides data for risk identification and assessment of the material in our supply chains. In 2021, we began reviewing this data and will continue to assess it in 2022.*

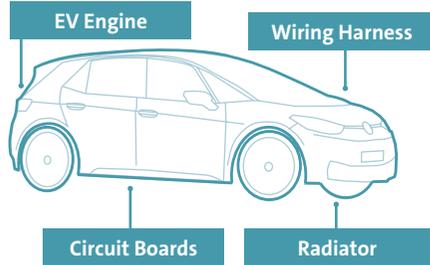
## OUTLOOK 2022

Sustainability standards and certification schemes for aluminum only recently begun to gain traction in the upstream and midstream sector. Therefore, the availability of certified material on the market is still limited. The roll-out of ASI certifications can be especially challenging in certain markets due to the local regulatory environment. Volkswagen Group will continue to promote the ASI certification and support suppliers in improving their responsible sourcing performance.

*In the near future, Volkswagen Group aims to introduce a specification document for its aluminum suppliers. For certain types of products, it will include a binding requirement for ASI certification or ASI membership of the suppliers.*



## KEY APPLICATION



## OUR APPROACH: RISK IDENTIFICATION AND RISK ASSESSMENT RESULTS

The key element of the Group’s risk assessment approach was our active involvement in the Copper Mark, an industry initiative and assurance framework for responsible copper production. Since 2019, we have taken a seat on its advisory council and participated in regular meetings, providing a downstream perspective on the Copper Mark assurance process and the Chain of Custody Standard.

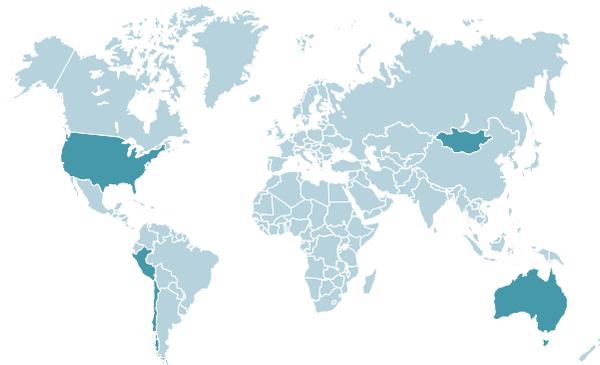
**By the end of 2021, the Copper Mark had certified 18 copper mine sites in Chile, Mongolia, USA, Peru and Australia.**

**18** CERTIFIED COPPER MARK COPPER MINE SITES

## KEY MATERIAL-SPECIFIC RISKS

**Adverse environmental impacts**

**Threats to indigenous people and communities**



Information gathered from Copper Mark audits and stakeholder engagement provide valuable insights for our risk identification and assessment in copper supply chains. To find out more, visit **Copper Mark**.

*Furthermore, Volkswagen Group is an active member in the Sector Dialogue Automotive, dedicated to human rights and environmental risks related to minerals extraction. Copper is a priority material in focus for the Dialogue.*

## RISK MITIGATION ACTIONS TAKEN: FACTS AND FIGURES

We encourage our suppliers to take part in the Copper Mark certification and therefore increase the global supply of certified copper. We do acknowledge that this undertaking requires significant resources and time.

*In addition to supporting sector-wide responsible sourcing activities, we are also conducting market research and reviewing opportunities for more sustainable copper sourcing within Volkswagen Group.*

### OUTLOOK 2022

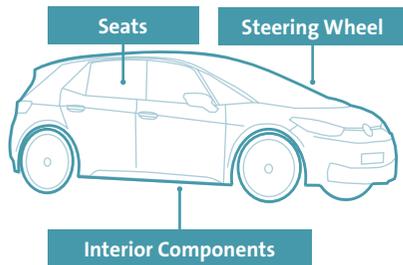
Considering the complexity of copper supply chains and the material’s wide use, Volkswagen Group acknowledges that full mapping up to the mine is not attainable at this stage. Therefore, industry engagement remains our main tool for managing risks related to copper sourcing. Violations against our requirements and policies, however, can be reported to us via our grievance mechanism.

*One of our key objectives in 2022 is to select priority Tier-1 suppliers for direct engagement and begin cooperation to jointly address responsible sourcing challenges in the Volkswagen Group copper supply chains.*



Leather

## KEY APPLICATION



## KEY MATERIAL-SPECIFIC RISKS



Adverse environmental impacts



Risks to workers' occupational health and safety

## OUR APPROACH: RISK IDENTIFICATION AND RISK ASSESSMENT RESULTS

In 2020, Volkswagen Group collected and assessed supply chain data through direct supplier outreach. In 2021, our approach also included a review of credible sector studies (World Wide Fund for Nature (WWF), TDI Sustainability) and interactions with NGOs and industry initiatives, including the Leather Working Group (LWG) and the International Leather Maker (ILM). Since 2021, Volkswagen Group has been represented in the LWG by one brand.

Besides the occupational health & safety risks associated with the use of chemicals in the tanning process, leather production is linked to environmental risks, such as deforestation, air and water pollution caused by the use of toxic chemicals.

Volkswagen Group identified South America, particularly Brazil and Paraguay, as a high-risk region in the global leather supply chain, where deforestation related to animal farming remains a major concern.



As of 2020, Volkswagen Group had no primary material from Brazil and Paraguay in its supply chain.

## RISK MITIGATION ACTIONS TAKEN: FACTS AND FIGURES

To address the above risks in 2021, Volkswagen Group updated its contractual requirements for leather suppliers to include a binding requirement on sustainability certification by the Leather Working Group. While the updated requirements will only become mandatory in early 2022, 7 out of 11 targeted leather suppliers were already certified in late 2020.

*Throughout 2021, we also hosted 3 workshops with 3 key suppliers, with the aim to communicate Volkswagen Group's expectations on responsibly sourced leather and help create strategies for their implementation.*

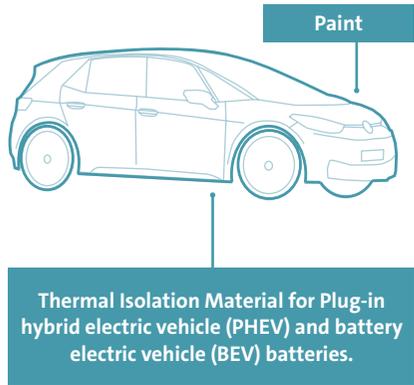
## OUTLOOK 2022

Volkswagen Group is aiming to collect further supply chain data during 2022 by working with suppliers directly as well as through the introduction of contractual requirements. While we expect our suppliers to adhere to the best industry practice, we would also like to support continuous improvement among all stakeholders in the leather value chain. *This is why we plan to increase our engagement with LWG and contribute to reviewing and updating the standard, making sure it remains relevant and lives up to growing industry expectations in future.*



Mica

KEY APPLICATION



OUR APPROACH: RISK IDENTIFICATION AND RISK ASSESSMENT RESULTS

Our approach in 2020 focused on direct engagement with paint and battery suppliers to map the mica supply chain. In late 2020, we joined the Responsible Mica Initiative, a multi-stakeholder group promoting transparency and better working conditions in mica production. In 2021, we took these activities a step further.

We identified 3 key pigment suppliers who are also members of the Responsible Mica Initiative and are committed to the same values and responsible sourcing practices.



RISK MITIGATION ACTIONS TAKEN: FACTS AND FIGURES

Considering the above limitations, Volkswagen is not able to confirm if the identified risks occur in our supply chain. Therefore, we chose to support broader industry efforts to tackle child labor and health and safety issues via the Responsible Mica Initiative. See more details on this engagement in **Box 4**.

Additionally, we determined that direct supplier engagement was the most appropriate measure to mitigate potential risks in the mica supply chain. In 2021, we conducted 16 workshops with suppliers to raise awareness of social and human rights issues linked to mica mining and advise them on tools to reduce supply chain risks. These workshops helped suppliers with a “readiness assessment” of their own sourcing practices and allowed Volkswagen to collect relevant traceability data and significantly improve transparency of its mica supply chain.

KEY MATERIAL-SPECIFIC RISKS



Child labor



Risks to workers' occupational health and safety

In 2021, we continued monitoring and analyzing credible media reports and research publications on industry risks. This approach allowed us to identify wide-scale human rights risks in mica-rich regions in India, where mica is often produced under dangerous conditions. The lack of proper safety equipment and training often leads to accidents and even fatalities.

Through our risk assessment, we could confirm that paint and pigment producers in the Volkswagen Group supply chain who source mica from India only work with official mines and cooperate directly with the processors, avoiding intermediaries and so ensuring higher transparency of the supply chain. We also identified Brazil and the US as significant regions of origin for mica in our paint, where all material comes from institutional mines.

Due to the higher complexity of battery supply chains, it is not yet possible to ensure traceability of all mica used in Thermal Isolation Material for Plug-in hybrid electric vehicle (PHEV) and battery electric vehicle (BEV) batteries.

Moreover, the lack of credible certification schemes makes it difficult to verify responsible sourcing claims made by dealers and other intermediaries in the mica supply chain.

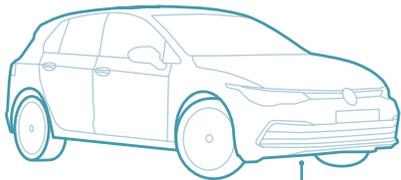
OUTLOOK 2022

Volkswagen is finalizing an update of the contractual requirements for mica suppliers that will include binding responsible sourcing requirements. It is expected to be launched in the second half of 2022. For this purpose, we have conducted expert interviews with tier-1 and tier-2 suppliers (paint and battery), our partners from the Responsible Mica Initiative and internal experts within the Volkswagen Group to create a procedure that will ensure transparency and minimize adverse impacts for local communities with a specific audit protocol.

*We plan to collect further upstream data during 2022 by working with suppliers directly as well as through our activities with the Responsible Mica Initiative.*



## KEY APPLICATION



Catalytic converter

## KEY MATERIAL-SPECIFIC RISKS



Human rights abuses committed by security forces



Risks to workers' occupational health and safety



Infringement on labor rights



Threats to indigenous people and communities

## OUR APPROACH: RISK IDENTIFICATION AND RISK ASSESSMENT RESULTS

Volkswagen Group's approach in 2021 focused on monitoring of media and research publications as well as direct supplier engagement.

Throughout the year, Volkswagen Group organized 10 online meetings with mining companies, fabricators (tier-2) and industry initiatives, to better understand the provenance of PGMs and the implementation of audit programs by tier-2 suppliers.



10 ONLINE MEETINGS



PGMS & AUDIT PROGRAMS

Three mining audits under the Initiative for Responsible Mining Assurance (IRMA) were conducted or scheduled in 2021.

Risk identification activities focused on South Africa as the world's largest exporter of PGMs.



## RISK MITIGATION ACTIONS TAKEN: FACTS AND FIGURES

The risk assessment of the PGM supply chain is still ongoing. Since launching these activities in 2020, the Group has made significant progress on collecting supplier information and improving data sharing among stakeholders along the PGM supply chain. However, due to the complexity of PGM supply chains, especially on the refiner and processor level, it is not yet possible to ensure full traceability up to the mine. We plan to collect further traceability data and enhance our engagement with various supply chain actors, such as traders and intermediaries, to address this challenge, focusing specifically on the mining sector in South Africa.

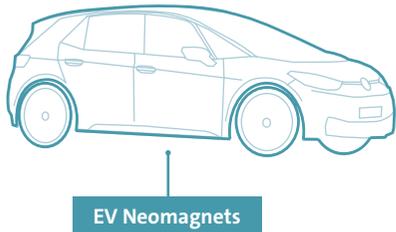
*In 2021, the Group continued internal capacity building on implementing sustainability requirements for PGM suppliers. Additionally, the Group has actively engaged in dialogue with the International Platinum Association (IPA) and its member companies on sector-wide risk mitigation efforts including endorsing the joint audit approach that was decided in 2019 by the members in IPA and relevant automotive actors including Scania and the Volkswagen Group.*

## OUTLOOK 2022

The Volkswagen Group will continue promoting an industry-wide approach to risk mitigation and supplier audit by hosting new workshops with the IPA and actively reaching out to major PGM mining companies. *The Group is also creating a clear process to address risks and non-conformances identified via audits and media screening.*



## KEY APPLICATION



## OUR APPROACH: RISK IDENTIFICATION AND RISK ASSESSMENT RESULTS

Our approach to risk identification in the REE supply chain was to engage with various groups of stakeholders. Since 2019, Volkswagen Group has actively participated in the Raw Material Working Group of the Verband der Automobilindustrie (VDA), a German automotive industry partnership. As part of the working group's REE cluster, Volkswagen took part in biweekly meetings dedicated to the REE value chain, supply & demand, bottlenecks, strategies to secure REEs on the federal and EU level, as well as responsible sourcing and sustainability.

Through engagement in VDA, the Volkswagen Group is also in contact with the European Raw Material Alliance (ERMA) which promotes reliable, secure and sustainable access to raw materials.

The Group has collected supply chain information through supplier outreach, review of publicly available data and conversations with experts.

REEs are among critical raw materials covered in the Drive Sustainability Raw Material Outlook, which provides data for material-specific risk identification and assessment in our supply chains. In 2021, we began reviewing this data and will continue to assess it in 2022.

## RISK MITIGATION ACTIONS TAKEN: FACTS AND FIGURES

As we are still collecting data on Volkswagen Group's REE supply chain, our risk assessment and mitigation activities so far have been mainly focused on the wider REE industry analysis and stakeholder engagement. During 2021, Volkswagen Group continued engaging with sector initiatives and NGOs and contributed to sector dialogue on responsible sourcing of REEs. Notably, Volkswagen Group acts as a participant in the German-Chinese Pilot Project for Sustainability Requirements in the Chinese Rare Earth Supply Chain led by the Federal Institute for Geosciences and Natural Resources (Bundesanstalt für Geowissenschaften und Rohstoffe, "BGR") and the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC). The project aims to promote the exchange between German and Chinese industry on sustainability requirements in the supply chain for Rare Earths.

## OUTLOOK 2022

Due to a high concentration of the REEs supply chain in China, it is not yet possible to ensure full traceability up to the mine. *The Volkswagen Group's objective for 2022 is to gain further data on its magnet supply chain, expand our direct engagement with suppliers, and host workshops on the Group's sustainability approach with actors along the REEs supply chain.*

## KEY MATERIAL-SPECIFIC RISKS



Child Labor



Modern Slavery



Systematic or widespread human rights abuses



Human rights abuses committed by public or private security forces



Support to non-state armed groups or public or private security forces



Risks to workers' occupational health and safety



Adverse environmental impacts



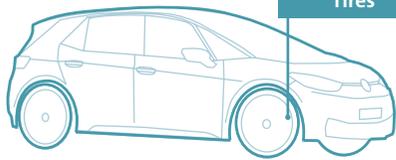
Infringement on labor rights



Discrimination and harassment



## KEY APPLICATION



## KEY MATERIAL-SPECIFIC RISKS

-  **Adverse environmental impacts**
-  **Risks to workers' occupational health and safety**
-  **Child labor**
-  **Modern Slavery**
-  **Discrimination and harassment, including against vulnerable groups**
-  **Infringement on labor rights**
-  **Threats to indigenous people and communities**

## OUR APPROACH: RISK IDENTIFICATION AND RISK ASSESSMENT RESULTS

In 2021, we have achieved substantial results in collecting supplier information through our Supply Chain Mapping Questionnaire and conducting comprehensive mapping up to the source. We have so far identified approximately 500 actors in our rubber supply chain, achieving transparency up to tier 4.

**We identified the following countries of origin in our supply chain: Brazil, Cameroon, China, Ecuador, Ghana, Guatemala, Guinea, India, Indonesia, Ivory Coast, Liberia, Malaysia, Mexico, Myanmar, Nigeria, Thailand, and Vietnam.**



For every identified supply chain actor, we piloted a systematic risk assessment on Maplecroft Global Risk Dashboard, which is a global risk intelligence tool, that incorporates responsible sourcing risk data. In the future, we are going to test it on our other raw materials, too.

We have also conducted media monitoring and reviewed relevant research publications to gain insight into industry-specific risks. Finally, we have been in dialogue with multiple stakeholders, including international environmental NGOs and industry associations, and joined the Global Platform for Sustainable Natural Rubber (GPSNR), a membership organization leading responsible sourcing and defining the framework of sustainability in the sector.

## RISK MITIGATION ACTIONS TAKEN: FACTS AND FIGURES

Our focus in 2021 was on increasing transparency in the natural rubber sector and addressing the lack of credible, industry-wide sustainability standards. As GPSNR members, we are contributing to the development of reporting requirements to be implemented during 2022 for rubber suppliers and the Shared Responsibility Framework with the aim of further advancing the development of sector-specific standards.

We are proud to be part of CASCADE, a community project in Indonesia to support local rubber producers, raise awareness, and address responsible sourcing issues on the ground. Based on our risk assessment results to date, we are preparing to start more targeted risk mitigation measures in 2022. For more information on the CASCADE project, see **Box 8** in this report.

## OUTLOOK 2022

Together with the Volkswagen Group Research, we have established a project on innovative tracing technologies and their usability in the natural rubber value chain.

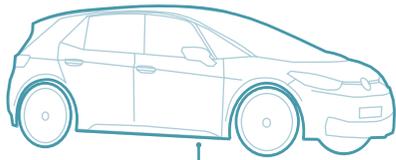
One of our next steps is to finalize and roll out contractual requirements with mandatory responsible sourcing requirements for our tire suppliers, as well as to move forward with risk mitigation measures. Together with the relevant stakeholders, we are also reviewing opportunities to develop a more sustainable tire by exploring secondary and renewable materials, as well as natural rubber substitutes.

*In 2022 we will strengthen our engagement in the various working groups of the GPSNR and contribute to the application of the GPSNR implementation guidance in our upstream supply chain.*



Fe  
IRON

## KEY APPLICATION



Body sheets

### OUR APPROACH: RISK IDENTIFICATION AND RISK ASSESSMENT RESULTS

Volkswagen Group’s approach focused on gathering risk information, in particular at the mining level of major raw material input to the steel industry, like iron ore mine sites, including the assessment of data provided from the Drive Sustainability Raw Material Outlook. With major steel suppliers, Volkswagen continued workshops to request mapping information and promote third-party assured products and mine sites. Furthermore, one potential grievance at a European steel mill was investigated in regard to its potential adverse health impacts on surrounding areas.

Several raw materials (e.g., iron ore, graphite, nickel, molybdenum) for the production of steel are covered in the Drive Sustainability Raw Material Outlook, which provides data for risk identification and assessment of the material in our supply chains. In 2021, we began reviewing this data and will continue to assess it in 2022.

### RISK MITIGATION ACTIONS TAKEN: FACTS AND FIGURES

We are continuing our outreach to our steel suppliers in order to leverage their influence for risk mitigation along the steel supply chain.

*We are pleased to note that an increasing number of our steel suppliers are joining the ResponsibleSteel initiative.*

### OUTLOOK 2022

We will continue to analyze the risk assessment data from the Raw Material Outlook report in 2022 as well as the engagement with our suppliers and relevant industry initiatives.

## KEY MATERIAL-SPECIFIC RISKS



Adverse environmental impacts



Risks to workers' occupational health and safety



Infringement on labor rights



Discrimination and harassment, including against vulnerable groups



Threats to indigenous people and communities

## INDUSTRY GROUP ENGAGEMENT AND ON-THE-GROUND PROJECTS

Since late 2020, Volkswagen Group has been engaged in Cobalt for Development (C4D), a cross-industry initiative to support communities dependent on artisanal cobalt mining in the Lualaba Province, Democratic Republic of Congo (DRC). Although the Volkswagen Group currently does not source cobalt from artisanal mines, it finances the project, along with BASF, BMW Group, Samsung Electronics, and Samsung SDI, with the objective to improve the conditions on the ground and transform the local ASM sector into a safe and socially responsible cobalt source in the long term. The project is implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ).

In 2021, we deepened our engagement in several industry groups, for example working closely with the Responsible Mica Initiative and Drive Sustainability. We added new partnerships, including Membership in the GPSNR and the Responsible Supply Chain Initiative of the German Association of the Automotive Industry. Furthermore, we backed industry-wide responsible business pledges, such as the Moratorium against Deep Sea Mining, and prepared for membership to the Initiative for Responsible Mining Assurance (IRMA). Finally, we played a major role in public-private partnerships with GIZ via two on-the-ground projects in our battery raw material supply chains (for lithium and cobalt) and supported rubber farmers in Indonesia through the CASCADE (Committed Actions for Smallholders Capacity Development) project.

This section includes details on these engagements from 2021. A full list of our membership and participation in industry groups and initiatives can be found in [Annex II](#).

### BOX 4

#### OUR WORK WITH THE RESPONSIBLE MICA INITIATIVE



Porsche, as a representative of the Volkswagen Group, is an active member of the Responsible Mica Initiative, through which we contribute to promoting responsible sourcing practices and help improve the living conditions for the communities dependent on mica production. Porsche has a seat on the initiative's board and was involved in the development of the revised 2030 strategy.



We actively contribute to the initiative's community empowerment programs (CEP), which benefit 130 villages in the key mica producing regions of Jharkhand and Bihar in India. Launched in 2018, the programs have focused on providing quality education for children, raising awareness amongst vulnerable families of additional economic opportunities, and ensuring appropriate regard for health and safety for any mica mining conducted in the region. The project also ensures better access to healthcare for affected families and offers support with

navigating local governmental services. During the COVID-19 pandemic, the Responsible Mica Initiative distributed medical masks and other necessary supplies to the villages.

A key milestone in 2021, Volkswagen Group contributed to the Responsible Mica Initiative's work to develop the first Global Workplace Standard for Mica Processors. First processors have already been through a pilot audit against the new standard in 2021. Furthermore, we began work to draft an audit protocol for third-party assurance of upstream companies in the mica supply chain, including mine sites.

In 2022, we look forward to continuing our work with the Responsible Mica Initiative to advance the third-party assurance protocol for mica supply chains. We will support several research projects, including a study to define the living wage for mica miners in India and stakeholder mapping in the mica sector in Madagascar. Through joint efforts led by the Responsible Mica Initiative, we will also continue to work with the local government and relevant stakeholders to establish a legal framework for fair labor conditions in mica mining in India. Lastly, we eagerly anticipate the launch of the Responsible Mica Initiative's platform for traceability data, which will include information on supplier audits and performance that we can use to boost Volkswagen Group's due diligence efforts in mica supply chains.

## BOX 5

MORATORIUM AGAINST  
DEEP SEA MINING

In 2021, Volkswagen Group joined other companies in the global pledge for a moratorium on seabed mining **No Deep Seabed Mining** and has committed to not source any materials linked to this method of producing raw materials. Considering the surging global demand for nickel and other minerals (copper, cobalt, lithium and manganese) widely used in innovative technologies, various international actors are currently exploring opportunities for tapping ocean floor deposits.

As part of our risk assessment approach for nickel supply chains, Volkswagen Group consulted multiple experts from the public sector, academia and business and conducted a thorough analysis of available data on deep sea mining. Our conclusion is that current research cannot sufficiently rule out adverse impacts of mining and tailings disposal on the delicate deep-sea ecosystem, which motivated us to join the WWF's global pledge for a moratorium on seabed mining.

DEEP SEABED MINING GOES AGAINST THE PRINCIPLES  
OF A CLOSED-LOOP ECONOMY BY:

- Creating significant pollution and environmental destruction
- Exploiting finite resources that are essential to the functioning of deep-sea ecosystems
- Upsetting ocean carbon, metals and nutrients cycles
- Undermining efforts to increase recycling of minerals and metals
- Undermining efforts to reduce material intensity in design and production

©WWF

ON-THE-GROUND PROJECTS



BOX 6

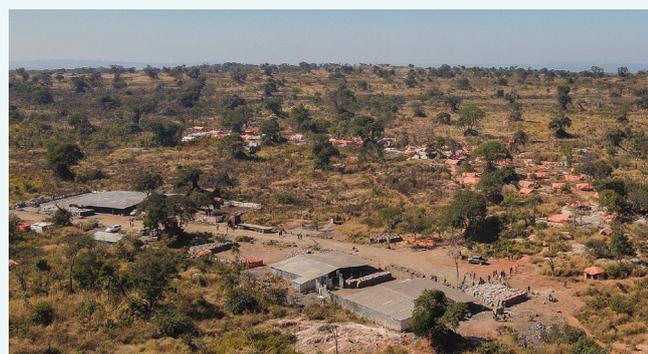
**COBALT FOR DEVELOPMENT**  
**IMPROVING LIVING AND WORKING STANDARDS IN**  
**LUALABA PROVINCE IN DEMOCRATIC REPUBLIC OF CONGO**



Since late 2020, Volkswagen Group has been engaged in Cobalt for Development (C4D), a cross-industry initiative to support communities dependent on artisanal cobalt mining in the Lualaba Province, Democratic Republic of Congo (DRC). Volkswagen Group finances the project, along with BASF, BMW Group, Samsung Electronics, and Samsung SDI. The project is implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ).



Throughout 2021, the C4D project provided trainings that promote internationally recognized responsible mining practices to local artisanal mining cooperatives. In cooperation with the government authority in charge of artisanal and small-scale mining, SAEMAPE (Service d'Assistance et d'Encadrement de l'Exploitation Minière Artisanale et à Petite Echelle), initial training sessions have been carried out supporting 14 cooperatives. As a continuation of this, on-site coaching activities have been organized in 3 selected cooperatives helping them improve in the areas of occupational safety, environmental management and legal conformity at mine sites. The trainings methodology developed by C4D includes modules on, health and safety standards on mine sites, including the use of personal protective equipment (PPE),



environmental management, administrative aspects of mining operations and legal compliance, including the prevention of child labor. In 2021 C4D has directly trained 300 miners, although continued working on the sustainability of this effort by capacitating the SAEMAPE staff through training of trainers activities. 95 site visits were conducted throughout the year that cover an estimated 20,000 miners working on these sites.

In 2021, the C4D project continued positively impacting the livelihoods of local communities in Kisote, Tshikopo and Kitanika, through the capacity-building program, which offered trainings on financial literacy and alternative sources of income. As a result of the financial literacy training, community members could establish community saving groups and financing opportunities, which enabled local entrepreneurs to start their own businesses. Successful examples include a bakery and a tailor shop for production of school uniforms. Furthermore, the project observed an increase in earnings through alternative sources of income, often achieved through farming, as well as improved nutrition of the affected families.



Creating improved education infrastructure for children in artisanal mining areas is a crucial factor to fight against their exploitation and presence in mining sites. Therefore, the project continues with its support to the school renovation and the construction of a clinic within it, accommodating nearly 500 children.

FACTS AND FIGURES 2021:

<b>72</b> small business were founded overall (50 in 2021)	Income increased by <b>36%</b> (overall)	Number of children in school increased from <b>70% to 95%</b> (overall)
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## BOX 7

### RESPONSIBLE LITHIUM PARTNERSHIP FOSTERING STAKEHOLDER DIALOGUE IN SALAR DE ATACAMA BASIN IN CHILE

In early 2021, Volkswagen Group partnered with BASF, Daimler AG and Fairphone to launch the Responsible Lithium Partnership, a project to support sustainable use of resources in Salar de Atacama, a major lithium-producing region in Chile. This cross-industry partnership commissioned the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) to coordinate the project, which seeks to find common ground by building a multi-stakeholder platform among relevant actors in the Salar watershed, including civil society groups, indigenous communities, government institutions, mining companies and others.

Following the first scoping studies into the region in 2020, the project partners found that only very limited interaction was taking place among the local stakeholder groups and there was a lack of consensus regarding the impacts and risks of lithium mining and other economic activities in the region. Therefore, our first step was to initiate a participatory process that would foster dialogue among local stakeholders, review scientific research data and begin discussing possible solutions.



In 2021, we launched the multi-stakeholder platform and established a governance structure for its ongoing activities. The project for the first time brought together various local stakeholder groups, allowing them to engage in a constructive dialogue, set common objectives and agree on a joint work plan. The partnership continues to facilitate cooperation amongst local actors with the aim to develop a shared vision for a sustainable future of the Salar de Atacama watershed.



## BOX 8

### CASCADE – SUPPORTING RUBBER FARMERS IN INDONESIA

In 2021, Volkswagen Group expanded its engagement in CASCADE (Committed Actions for Smallholders Capacity Development), a community project in the Jambi province in central Sumatra, Indonesia, initiated by Porsche and global tire manufacturer Michelin a year earlier. The 5-year community engagement program involved trainings for 1,000 local farmers with the objective to increase yield and income. Besides addressing poverty, the project also covers environmental and human rights aspects, such as carbon emissions, women and youth inclusion and anti-discrimination.



## 5 LIMITATIONS AND OUTLOOK FOR 2022

### LIMITATIONS IN RAW MATERIAL SUPPLY CHAIN DUE DILIGENCE

2021 was the first full year of implementation for our RMDDMS. Throughout the year, we saw major achievements across the individual raw materials, as well as in the overall management system. However, we also continued to encounter obstacles along the way. While our RMDDMS enables us to shift our approach and adapt to challenges, other limitations require ongoing effort and collaborative action. Below we share our experiences with these common challenges to supply chain due diligence in 2021.

#### LAWS, LEGAL FRAMEWORKS AND RESTRICTIONS ON DATA EXCHANGE AFFECTING SUPPLY CHAIN TRANSPARENCY

Volkswagen Group has been piloting a variety of traceability systems in various supply chains. Despite the clear need for more transparent supply chains and automated data flow, we as well as our suppliers and competitors must comply with laws, legal requirements and obligations such as anti-trust laws and non-disclosure agreements (NDAs) that prohibit or at least limit exchange of certain information among our business partners and industry peers. We strictly comply with these provisions and expect the same from our business partners, while recognizing that these may slow down the efforts to increase supply chain transparency. Moreover, we see that the implementation of a technical system itself is resource-intensive at every step of the supply chain. Given the global nature of our supply chains and data flow that takes place across jurisdictions, it will be important to monitor regulatory developments and adapt to new challenges and uncertainties as more countries introduce new data security laws.

#### LIMITED RESPONSIBLE SOURCING MATURITY AMONGST (SUB-)SUPPLIER GROUPS

Through our battery materials mapping and auditing program, we conducted audits of 25 suppliers against the 5 Steps Framework of the OECD Guidance. We were able to successfully agree on corrective action plans with the audited suppliers. However, despite openness to adopt the OECD Framework, over time, we observed that closing gaps on Step 2: Risk Identification and Assessment and Step 3: Risk Mitigation remained a challenge for many of our (sub-)suppliers to implement.

In line with the OECD Guidance, we are committed to establishing relationships and building supplier capacity for responsible sourcing. Through our RMDDMS, we have provided trainings for suppliers on OECD-aligned supply chain due diligence, reaching more than 7.000 suppliers in 2021.

#### CERTIFICATION SCHEMES ARE EITHER MISSING, NOT CREDIBLE OR TOO NEW TO HAVE MAJOR IMPACT

Standards and certification schemes provide us with valuable insight and verification of supplier performance on human rights and environmental expectations. However, some schemes lack or

have weak mechanisms for independent external assurance, which in turn makes their sustainability claims on products lack credibility. For some raw materials, there is simply a lack of certification schemes or existing credible schemes have only limited uptake within the upstream sector. The proliferation of certifications schemes has made it challenging to determine which claims offer reliable validation of strong supplier performance. Within this context, we also recognize that certification schemes are only one tool of due diligence and come with their own limitations.

In 2021, we have been an active participant and observer in the development of several raw material-specific and raw material-agnostic certification schemes. We engage directly with the certification bodies to support development of ambitious, attainable and verifiable audit protocols and to promote adoption within the industry. In 2021, we did this through our leadership role in developing and piloting the CERA41 raw material-agnostic standard, our position on the Copper Mark Advisory Board, our contributions in the working group developing an audit protocol for mica mining with the Responsible Mica Initiative.

Beyond our direct engagement with the standards organizations, we contributed to a Drive Sustainability project to develop a framework for comparing standards. The goal of this project was to benchmark the standards that exist for upstream actors and identify areas to push for more alignment across their approaches. The result of this work is the **Drive Sustainability Common Standards Recognition Framework**. In 2022, we will leverage this framework for a more in-depth analysis of responsible mining standards for our priority raw materials.

#### ON-THE-GROUND ASSESSMENTS AND IN-PERSON SUPPLIER ENGAGEMENT PREVENTED BY TRAVEL RESTRICTIONS

On-the-ground assessments and in-person supplier engagement are essential tool of our RMDDMS methodology for cooperation along the supply chain and to verify the supplier conformance to our responsible sourcing expectations. In 2021, due to continuing Covid-19-related global travel restrictions, we were again limited in our ability to have our suppliers undergo on-site audits. Also, we were unable to meet in-person for direct supplier engagement and supplier trainings.

#### HUMAN RIGHTS DUE DILIGENCE LEGISLATION DIFFERENCES ACROSS VARIOUS JURISDICTIONS

We appreciate and welcome the establishment of legislation for human rights supply chain due diligence which aims to provide a level playing field and concrete guidance on how companies can demonstrate better performance. However, there is currently a lack of consistency not only in the regulation of the approach to human rights due diligence, but also in the scope and definition of certain risk areas. This poses a challenge for companies like Volkswagen Group, which must now reconcile how to comply with regulations across multiple jurisdictions that include different guidance. We hope that regulators will make a greater effort to align their approaches and create more uniformity in regulation in the future.

## OUTLOOK 2022

We are highly motivated to improve our actions and risk mitigation measures in 2022, and hence plan to continue our efforts to increase the impact of our RMDDs by focusing the following additional priorities:

### RAW MATERIAL SPECIFIC OUTLOOK IN 2022:

We have provided an in-depth outlook for 2022 for our 16 priority raw materials in the one-pagers in section 4 of this report.

### PUBLICATION OF RAW MATERIAL POLICY:

In our 2020 report, we announced our plans to release an amended version of the Volkswagen Group Policy on Sustainable Raw Materials that aligns with our RMDDMS established in 2020. The policy will be the Group's key externally facing communication on what it seeks to achieve through raw materials human rights supply chain due diligence in the medium- to long-term. In 2021, we decided to postpone publication of the policy in order to ensure it is also aligned with the expectations set out in the German Supply Chain Act. This, therefore, remains a primary goal for Volkswagen Group as we look to publish and distribute the amended policy in 2022.

### SUPPLIER REQUIREMENTS/SPEC SHEETS:

Incorporating contractual requirements for our tier-1 suppliers to adhere to responsible sourcing principles is a key component of OECD Guidance. It is also one of the most effective measures for Volkswagen Group to communicate, enforce and reward supplier conformance with our human rights due diligence performance and disclosure expectations. In 2022, we will expand these contractual obligations for leather and other groups of suppliers of parts containing high-risk raw materials, and will strengthen our disclosure requirements to support enhanced supply chain transparency and traceability.

### MEMBERSHIP IN IRMA:

In 2021, we made the decision to join IRMA as one of our next strategic steps toward responsible material sourcing. In March 2022, we officially became a member of IRMA. We are looking forward to engaging with the initiative and progressively use the certification on our supply chains – with a priority to our battery supply chain. By doing so, we aim to drive change toward more responsible mining practices around the world with positive impact on the environment and people affected by mine sites.

### IMPACT MEASUREMENT OF OUR RMDDMS:

As we aim to provide our customers with vehicles for which we can assure materials have been produced and manufactured with respect to high human rights and environmental standards, we will, in 2022, continue to strengthen our due diligence efforts through gaining transparency and auditing our raw material supply chains. One challenge, however, is the impact measurement of our due diligence measures. Our due diligence action is only one variable linked to tackling human rights infringements and their occurrence, an issue which is complex and the main responsibility for protecting human rights remains with the state.

### INCREASE INTERNAL CAPACITY:

In 2022, we look forward to further increasing and enhancing our capacity for human rights due diligence in our raw material supply chains. For this, we plan to grow our Working Group and to continue conducting regular capacity-building activities and internal trainings.

### STRENGTHEN USE OF ARTIFICIAL INTELLIGENCE (AI) BASED MEDIA SCREENING:

As we are currently utilizing AI to identify sustainability risks in our supply chain, such as environmental pollution, human rights abuses and corruption at an early stage (**Porsche, Audi and Volkswagen use Artificial Intelligence to minimize sustainability risks**), we will initiate a pilot project in 2022 with the objective to cross-reference and verify mapping and audit results of our supply chains.

## ANNEX I: LIST OF ABBREVIATIONS

3TG	Tin, Tantalum, Tungsten and Gold
AI	Artificial Intelligence
ASI	the Aluminium Stewardship Initiative (ASI)
BEV	Battery Electric Vehicle
BGR	Bundesanstalt für Geowissenschaften und Rohstoffe
C4D	Cobalt for Development
CAP	Corrective Action Plan
CASCADE	Committed Actions for Smallholders Capacity Development
CCCMC	China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters
CERA	Certification of Raw Materials
CLI	Child Labor Index
CMRT	Conflict Minerals Reporting Template
COC	Chain of Custody
DRC	the Democratic Republic of Congo
ERMA	European Raw Material Alliance
EV	Electric Vehicle
FAO	the Food and Agriculture Organization of the United Nations
GBA	Global Battery Alliance
GPSNR	Global Platform for Sustainable Natural Rubber
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
ILM	International Leather Maker
IPA	International Platinum Association
IRMA	the Initiative for Responsible Mining Assurance
KPI	Key Performance Indicators
LPPM	London Platinum and Palladium Market
LWG	Leather Working Group
OECD	the Organisation for Economic Co-operation and Development
OHS	Occupational Health and Safety
NAP	National Action Plan
PGM	Platinum Group Metals
PHEV	Plug-in Hybrid Electric Vehicles
REE	Rare Earth Elements
RMDDMS	Raw Materials Due Diligence Management System
RMI	Responsible Minerals Initiative
RSCI	Responsible Supply Chain Initiative
SAEMAPE	Service d'Assistance et d'Encadrement de l'Exploitation Minière Artisanale et à Petite Echelle (DRC government authority in charge of artisanal and small-scale mining)
SoR	Smelter or Refiner
VDA	Verband der Automobilindustrie
WWF	World Wide Fund for Nature

# ANNEX II: LIST OF VOLKSWAGEN GROUP’S RESPONSIBLE SOURCING INDUSTRY GROUP AND INITIATIVE PARTICIPATION

## OUR 2021 MEMBERSHIPS AND ENGAGEMENTS IN INDUSTRY INITIATIVES AND GROUPS

### RAW MATERIAL-AGNOSTIC INDUSTRY GROUPS

Founding member of the **Drive Sustainability Initiative** which is an associate member of the Global Platform for Sustainable Natural Rubber (GPSNR) and ResponsibleSteel

Membership in the **Responsible Minerals Initiative (RMI)**

Participation in the **Swedish Leadership for Sustainable Development**

**Membership in Teknikföretagen** - Association of Swedish Engineering Industries

Participation in the German “**National Action Plan for the Implementation of the UN Guiding Principles on Business and Human Rights**” (NAP), Sector Dialogue Automotive, Working Group 2 “Respecting Human Rights in Natural Resource Value Chains and Supply Networks”

Membership in the **Global Battery Alliance (GBA)**

Membership in the **Responsible Supply Chain Initiative (RSCI)** of the German Association of the Automotive Industry (VDA)

Participation in the **Advisory Board of CERA**

### RAW MATERIAL-SPECIFIC INDUSTRY GROUPS



#### 3TGs

Participation in the RMI’s Gold Working Group



#### Aluminum

Membership in the Aluminium Stewardship Initiative (ASI)



#### Cobalt

Membership in the Global Battery Alliance Cobalt Action Partnership (CAP)

Participation in the RMI’s Cobalt Working Group and ASM Working Group

Membership in the Cobalt for Development Initiative



#### Copper

Participation in the Copper Mark Advisory Group



#### Leather

Engagement with the Leather Working Group (LWG)



#### Mica

Membership on the Board of Directors of the Responsible Mica Initiative

Participation in the RMI’s mica working group



#### PGMs

Engagement with the International Platinum Association (IPA)

Engagement with the London Platinum and Palladium Market (LPPM)



#### Rubber

Participation in the Natural Rubber Roundtable organized by Südwind Institut and GIZ

## ANNEX III: LIST OF 3TG SMELTERS

Metal	Smelter	RMI Smelter Id
Gold	Advanced Chemical Company	CID000015
Gold	Aida Chemical Industries Co., Ltd.	CID000019
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	CID000035
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	CID000041
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	CID000058
Gold	Argor-Heraeus S.A.	CID000077
Gold	Asahi Pretec Corp.	CID000082
Gold	Asaka Riken Co., Ltd.	CID000090
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	CID000103
Gold	Aurubis AG	CID000113
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	CID000128
Gold	Boliden AB	CID000157
Gold	C. Hafner GmbH + Co. KG	CID000176
Gold	Caridad	CID000180
Gold	CCR Refinery - Glencore Canada Corporation	CID000185
Gold	Cendres + Metaux S.A.	CID000189
Gold	Yunnan Copper Industry Co., Ltd.	CID000197
Gold	Chimet S.p.A.	CID000233
Gold	Chugai Mining	CID000264
Gold	Daye Non-Ferrous Metals Mining Ltd.	CID000343
Gold	DSC (Do Sung Corporation)	CID000359
Gold	DODUCO Contacts and Refining GmbH	CID000362
Gold	Dowa	CID000401
Gold	Eco-System Recycling Co., Ltd. East Plant	CID000425
Gold	OJSC Novosibirsk Refinery	CID000493
Gold	Refinery of Seemine Gold Co., Ltd.	CID000522
Gold	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	CID000651
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	CID000671
Gold	LT Metal Ltd.	CID000689
Gold	Heimerle + Meule GmbH	CID000694
Gold	Heraeus Metals Hong Kong Ltd.	CID000707
Gold	Heraeus Precious Metals GmbH & Co. KG	CID000711
Gold	Hunan Chenzhou Mining Co., Ltd.	CID000767
Gold	Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.	CID000773
Gold	HwaSeong CJ CO., LTD.	CID000778
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CID000801
Gold	Ishifuku Metal Industry Co., Ltd.	CID000807
Gold	Istanbul Gold Refinery	CID000814
Gold	Japan Mint	CID000823
Gold	Jiangxi Copper Co., Ltd.	CID000855
Gold	Asahi Refining USA Inc.	CID000920
Gold	Asahi Refining Canada Ltd.	CID000924
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	CID000927

Metal	Smelter	RMI Smelter Id
Gold	JSC Uralelectromed	CID000929
Gold	JX Nippon Mining & Metals Co., Ltd.	CID000937
Gold	Kazakhmys Smelting LLC	CID000956
Gold	Kazzinc	CID000957
Gold	Kennecott Utah Copper LLC	CID000969
Gold	Kojima Chemicals Co., Ltd.	CID000981
Gold	Kyrgyzaltyn JSC	CID001029
Gold	L'azurde Company For Jewelry	CID001032
Gold	Lingbao Gold Co., Ltd.	CID001056
Gold	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	CID001058
Gold	LS-NIKKO Copper Inc.	CID001078
Gold	Luoyang Zijin Yinhuai Gold Refinery Co., Ltd.	CID001093
Gold	Materion	CID001113
Gold	Matsuda Sangyo Co., Ltd.	CID001119
Gold	Metalor Technologies (Suzhou) Ltd.	CID001147
Gold	Metalor Technologies (Hong Kong) Ltd.	CID001149
Gold	Metalor Technologies (Singapore) Pte., Ltd.	CID001152
Gold	Metalor Technologies S.A.	CID001153
Gold	Metalor USA Refining Corporation	CID001157
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	CID001161
Gold	Mitsubishi Materials Corporation	CID001188
Gold	Mitsui Mining and Smelting Co., Ltd.	CID001193
Gold	Moscow Special Alloys Processing Plant	CID001204
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	CID001220
Gold	Navoi Mining and Metallurgical Combinat	CID001236
Gold	Nihon Material Co., Ltd.	CID001259
Gold	Ohura Precious Metal Industry Co., Ltd.	CID001325
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	CID001326
Gold	PAMP S.A.	CID001352
Gold	Penglai Penggang Gold Industry Co., Ltd.	CID001362
Gold	Prioksky Plant of Non-Ferrous Metals	CID001386
Gold	PT Aneka Tambang (Persero) Tbk	CID001397
Gold	PX Precinox S.A.	CID001498
Gold	Rand Refinery (Pty) Ltd.	CID001512
Gold	Royal Canadian Mint	CID001534
Gold	Sabin Metal Corp.	CID001546
Gold	Samduck Precious Metals	CID001555
Gold	Samwon Metals Corp.	CID001562
Gold	SEMPA Joyeria Plateria S.A.	CID001585
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	CID001619
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CID001622
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CID001736
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	CID001756
Gold	Solar Applied Materials Technology Corp.	CID001761
Gold	Sumitomo Metal Mining Co., Ltd.	CID001798
Gold	Smelter Not Listed	CID001810

Metal	Smelter	RMI Smelter Id
Gold	Tanaka Kikinzoku Kogyo K.K.	CID001875
Gold	Great Wall Precious Metals Co., Ltd. of CBPM	CID001909
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	CID001916
Gold	Tokuriki Honten Co., Ltd.	CID001938
Gold	Tongling Nonferrous Metals Group Co., Ltd.	CID001947
Gold	Torecom	CID001955
Gold	Umicore S.A. Business Unit Precious Metals Refining	CID001980
Gold	United Precious Metal Refining, Inc.	CID001993
Gold	Valcambi S.A.	CID002003
Gold	Western Australian Mint (T/a The Perth Mint)	CID002030
Gold	Yamakin Co., Ltd.	CID002100
Gold	Yokohama Metal Co., Ltd.	CID002129
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CID002224
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CID002243
Gold	Morris and Watson	CID002282
Gold	SAFINA A.S.	CID002290
Gold	Guangdong Jinding Gold Limited	CID002312
Gold	Umicore Precious Metals Thailand	CID002314
Gold	Geib Refining Corporation	CID002459
Gold	MMTC-PAMP India Pvt., Ltd.	CID002509
Gold	KGHM Polska Miedz Spolka Akcyjna	CID002511
Gold	Fidelity Printers and Refiners Ltd.	CID002515
Gold	Singway Technology Co., Ltd.	CID002516
Gold	Shandong Humon Smelting Co., Ltd.	CID002525
Gold	Shenzhen Zhonghenglong Real Industry Co., Ltd.	CID002527
Gold	Al Etihad Gold Refinery DMCC	CID002560
Gold	Emirates Gold DMCC	CID002561
Gold	International Precious Metal Refiners	CID002562
Gold	Kaloti Precious Metals	CID002563
Gold	Sudan Gold Refinery	CID002567
Gold	T.C.A S.p.A	CID002580
Gold	REMONDIS PMR B.V.	CID002582
Gold	Fujairah Gold FZC	CID002584
Gold	Industrial Refining Company	CID002587
Gold	Shirpur Gold Refinery Ltd.	CID002588
Gold	Korea Zinc Co., Ltd.	CID002605
Gold	Marsam Metals	CID002606
Gold	TOO Tau-Ken-Altyn	CID002615
Gold	Abington Reldan Metals, LLC	CID002708
Gold	SAAMP	CID002761
Gold	L'Orfebre S.A.	CID002762
Gold	8853 S.p.A.	CID002763
Gold	Italpreziosi	CID002765
Gold	SAXONIA Edelmetalle GmbH	CID002777
Gold	WIELAND Edelmetalle GmbH	CID002778
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	CID002779
Gold	AU Traders and Refiners	CID002850
Gold	GCC Gujrat Gold Centre Pvt. Ltd.	CID002852
Gold	Sai Refinery	CID002853
Gold	Modeltech Sdn Bhd	CID002857

Metal	Smelter	RMI Smelter Id
Gold	Bangalore Refinery	CID002863
Gold	Kyshtym Copper-Electrolytic Plant ZAO	CID002865
Gold	Degussa Sonne / Mond Goldhandel GmbH	CID002867
Gold	Pease & Curren	CID002872
Gold	JALAN & Company	CID002893
Gold	SungEel HiMetal Co., Ltd.	CID002918
Gold	Planta Recuperadora de Metales SpA	CID002919
Gold	Smelter Not Listed	CID002920
Gold	Safimet S.p.A	CID002973
Gold	State Research Institute Center for Physical Sciences and Technology	CID003153
Gold	African Gold Refinery	CID003185
Gold	Gold Coast Refinery	CID003186
Gold	NH Recytech Company	CID003189
Gold	QG Refining, LLC	CID003324
Gold	Dijllah Gold Refinery FZC	CID003348
Gold	CGR Metalloys Pvt Ltd.	CID003382
Gold	Sovereign Metals	CID003383
Gold	C.I Metales Procesados Industriales SAS	CID003421
Gold	Eco-System Recycling Co., Ltd. North Plant	CID003424
Gold	Eco-System Recycling Co., Ltd. West Plant	CID003425
Gold	Augmont Enterprises Private Limited	CID003461
Gold	Kundan Care Products Ltd.	CID003463
Gold	Emerald Jewel Industry India Limited (Unit 1)	CID003487
Gold	Emerald Jewel Industry India Limited (Unit 2)	CID003488
Gold	Emerald Jewel Industry India Limited (Unit 3)	CID003489
Gold	Emerald Jewel Industry India Limited (Unit 4)	CID003490
Gold	K.A. Rasmussen	CID003497
Gold	Alexy Metals	CID003500
Gold	Sancus ZFS (L'Orfebre, SA)	CID003529
Gold	Sellem Industries Ltd.	CID003540
Gold	MD Overseas	CID003548
Gold	Metallix Refining Inc.	CID003557
Gold	Metal Concentrators SA (Pty) Ltd.	CID003575
Gold	WEEEREFINING	CID003615
Gold	Value Trading	CID003617
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CID000211
Tantalum	Exotech Inc.	CID000456
Tantalum	F&X Electro-Materials Ltd.	CID000460
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	CID000616
Tantalum	Jiujiang JinXin Nonferrous Metals Co., Ltd.	CID000914
Tantalum	Jiujiang Tanbre Co., Ltd.	CID000917
Tantalum	LSM Brasil S.A.	CID001076
Tantalum	Metallurgical Products India Pvt., Ltd.	CID001163
Tantalum	Mineracao Taboca S.A.	CID001175
Tantalum	Mitsui Mining and Smelting Co., Ltd.	CID001192
Tantalum	NPM Silmet AS	CID001200
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CID001277
Tantalum	QuantumClean	CID001508
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CID001522
Tantalum	Solikamsk Magnesium Works OAO	CID001769

Metal	Smelter	RMI Smelter Id
Tantalum	Taki Chemical Co., Ltd.	CID001869
Tantalum	Telex Metals	CID001891
Tantalum	Ulba Metallurgical Plant JSC	CID001969
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CID002492
Tantalum	D Block Metals, LLC	CID002504
Tantalum	FIR Metals & Resource Ltd.	CID002505
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CID002506
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CID002508
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CID002512
Tantalum	KEMET Blue Metals	CID002539
Tantalum	H.C. Starck Co., Ltd.	CID002544
Tantalum	H.C. Starck Tantalum and Niobium GmbH	CID002545
Tantalum	H.C. Starck Hermsdorf GmbH	CID002547
Tantalum	H.C. Starck Inc.	CID002548
Tantalum	H.C. Starck Ltd.	CID002549
Tantalum	H.C. Starck Smelting GmbH & Co. KG	CID002550
Tantalum	Global Advanced Metals Boyertown	CID002557
Tantalum	Global Advanced Metals Aizu	CID002558
Tantalum	Resind Industria e Comercio Ltda.	CID002707
Tantalum	Jiangxi Tuohong New Raw Material	CID002842
Tantalum	Yancheng Jinye New Material Technology Co., Ltd.	CID003583
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CID000228
Tin	Alpha	CID000292
Tin	Smelter Not Listed	CID000309
Tin	Dowa	CID000402
Tin	EM Vinto	CID000438
Tin	Estanho de Rondonia S.A.	CID000448
Tin	Fenix Metals	CID000468
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CID000538
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CID000555
Tin	Gejiu Kai Meng Industry and Trade LLC	CID000942
Tin	China Tin Group Co., Ltd.	CID001070
Tin	Malaysia Smelting Corporation (MSC)	CID001105
Tin	Metallic Resources, Inc.	CID001142
Tin	Mineracao Taboca S.A.	CID001173
Tin	Minsur	CID001182
Tin	Mitsubishi Materials Corporation	CID001191
Tin	Jiangxi New Nanshan Technology Ltd.	CID001231
Tin	Novosibirsk Processing Plant Ltd.	CID001305
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	CID001314
Tin	Operaciones Metalurgicas S.A.	CID001337
Tin	PT Artha Cipta Langgeng	CID001399
Tin	Smelter Not Listed	CID001402
Tin	PT Babel Surya Alam Lestari	CID001406
Tin	Smelter Not Listed	CID001421
Tin	Smelter Not Listed	CID001428
Tin	PT Mitra Stania Prima	CID001453
Tin	Smelter Not Listed	CID001457
Tin	PT Prima Timah Utama	CID001458

Metal	Smelter	RMI Smelter Id
Tin	PT Refined Bangka Tin	CID001460
Tin	Smelter Not Listed	CID001463
Tin	PT Stanindo Inti Perkasa	CID001468
Tin	PT Timah Tbk Kundur	CID001477
Tin	PT Timah Tbk Mentok	CID001482
Tin	PT Timah Nusantara	CID001486
Tin	PT Tinindo Inter Nusa	CID001490
Tin	Smelter Not Listed	CID001493
Tin	Rui Da Hung	CID001539
Tin	Soft Metais Ltda.	CID001758
Tin	Thaisarco	CID001898
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CID001908
Tin	VQB Mineral and Trading Group JSC	CID002015
Tin	White Solder Metalurgia e Mineracao Ltda.	CID002036
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CID002158
Tin	Yunnan Tin Company Limited	CID002180
Tin	CV Venus Inti Perkasa	CID002455
Tin	Magnu's Minerais Metais e Ligas Ltda.	CID002468
Tin	Smelter Not Listed	CID002478
Tin	Melt Metais e Ligas S.A.	CID002500
Tin	PT ATD Makmur Mandiri Jaya	CID002503
Tin	O.M. Manufacturing Philippines, Inc.	CID002517
Tin	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	CID002572
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	CID002573
Tin	Tuyen Quang Non-Ferrous Metals Joint Stock Company	CID002574
Tin	Smelter Not Listed	CID002696
Tin	An Vinh Joint Stock Mineral Processing Company	CID002703
Tin	Resind Industria e Comercio Ltda.	CID002706
Tin	Super Ligas	CID002756
Tin	Metallo Belgium N.V.	CID002773
Tin	Metallo Spain S.L.U.	CID002774
Tin	Smelter Not Listed	CID002816
Tin	Thai Nguyen Mining and Metallurgy Co., Ltd.	CID002834
Tin	PT Menara Cipta Mulia	CID002835
Tin	HuiChang Hill Tin Industry Co., Ltd.	CID002844
Tin	Modeltech Sdn Bhd	CID002858
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CID003116
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CID003190
Tin	PT Bangka Serumpun	CID003205
Tin	Pongpipat Company Limited	CID003208
Tin	Tin Technology & Refining	CID003325
Tin	Dongguan CiEXPO Environmental Engineering Co., Ltd.	CID003356
Tin	Ma'anshan Weitai Tin Co., Ltd.	CID003379
Tin	Smelter Not Listed	CID003380
Tin	PT Rajawali Rimba Perkasa	CID003381
Tin	Luna Smelter, Ltd.	CID003387
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CID003397
Tin	Precious Minerals and Smelting Limited	CID003409

Metal	Smelter	RMI Smelter Id
Tin	Gejiu City Fuxiang Industry and Trade Co., Ltd.	CID003410
Tin	PT Mitra Sukses Globalindo	CID003449
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	CID003486
Tin	CRM Synergies	CID003524
Tin	Fabrica Auricchio Industria e Comercio Ltda.	CID003582
Tungsten	A.L.M.T. Corp.	CID000004
Tungsten	Kennametal Huntsville	CID000105
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CID000218
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CID000258
Tungsten	CNMC (Guangxi) PGMA Co., Ltd.	CID000281
Tungsten	Global Tungsten & Powders Corp.	CID000568
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CID000766
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	CID000769
Tungsten	Japan New Metals Co., Ltd.	CID000825
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CID000875
Tungsten	Kennametal Fallon	CID000966
Tungsten	Wolfram Bergbau und Hutten AG	CID002044
Tungsten	Xiamen Tungsten Co., Ltd.	CID002082
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	CID002313
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CID002315
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CID002316
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CID002317
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CID002318
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CID002319
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CID002320
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CID002321
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CID002494
Tungsten	Asia Tungsten Products Vietnam Ltd.	CID002502
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CID002513
Tungsten	H.C. Starck Tungsten GmbH	CID002541
Tungsten	H.C. Starck Smelting GmbH & Co. KG	CID002542
Tungsten	Masan Tungsten Chemical LLC (MTC)	CID002543
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CID002551
Tungsten	Niagara Refining LLC	CID002589
Tungsten	China Molybdenum Co., Ltd.	CID002641
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CID002645
Tungsten	Hydrometallurg, JSC	CID002649
Tungsten	Unecha Refractory metals plant	CID002724
Tungsten	Philippine Chuangxin Industrial Co., Inc.	CID002827
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CID002830
Tungsten	ACL Metais Eireli	CID002833
Tungsten	Moliren Ltd.	CID002845
Tungsten	KGETS Co., Ltd.	CID003388
Tungsten	Fujian Ganmin RareMetal Co., Ltd.	CID003401
Tungsten	Lianyou Metals Co., Ltd.	CID003407
Tungsten	JSC "Kirovgrad Hard Alloys Plant"	CID003408
Tungsten	NPP Tyazhmetprom LLC	CID003416
Tungsten	GEM Co., Ltd.	CID003417

Metal	Smelter	RMI Smelter Id
Tungsten	Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.	CID003427
Tungsten	Cronimet Brasil Ltda	CID003468
Tungsten	Artek LLC	CID003553
Tungsten	Fujian Xinlu Tungsten	CID003609
Tungsten	OOO "Technolom" 2	CID003612
Tungsten	OOO "Technolom" 1	CID003614

## ANNEX IV: LIST OF 3TG COUNTRIES OF ORIGIN

Afghanistan  
Åland Islands  
Albania  
American Samoa  
Andorra  
Angola  
Argentina  
Armenia  
Australia  
Austria  
Belarus  
Belgium  
Bermuda  
Bolivia  
Brazil  
Bulgaria  
Burundi  
Cambodia  
Canada  
Central African Republic  
Chile  
China  
Colombia  
Congo  
Democratic Republic of Congo  
Djibouti  
Dominica  
Dominican Republic  
Ecuador  
Egypt  
Eritrea  
Estonia  
Ethiopia  
Finland  
France  
Germany  
Ghana  
Guinea  
Guyana  
Hong Kong  
Hungary  
India  
Indonesia  
Ireland  
Israel  
Italy  
Japan  
Kazakhstan  
Kenya  
Korea  
Kyrgyzstan

Liberia  
Lithuania  
Luxembourg  
Madagascar  
Malaysia  
Mali  
Mauritania  
Mexico  
Mongolia  
Morocco  
Mozambique  
Myanmar  
Namibia  
Netherlands  
New Zealand  
Niger  
Nigeria  
Panama  
Papua New Guinea  
Peru  
Philippines  
Poland  
Portugal  
Russian Federation  
Rwanda  
Saudi Arabia  
Sierra Leone  
Singapore  
Slovakia  
Slovenia  
South Africa  
South Sudan  
Spain  
Sudan  
Suriname  
Sweden  
Switzerland  
Taiwan  
Tajikistan  
Tanzania  
Thailand  
Turkey  
Uganda  
United Arab Emirates  
United Kingdom  
United States  
Uzbekistan  
Viet Nam  
Zambia  
Zimbabwe

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