Responsible Raw Materials Report

2025

VOLKSWAGEN GROUP

Contents

Disclaimer

This report is prepared by the Volkswagen Group companies and the respective brands (“legal entities”) of the Working Group for the Responsible Raw Materials Due Diligence Management System (RMDDMS). These legal entities are Volkswagen AG, AUDI AG, Dr. Ing. h.c. F. Porsche AG, MAN Truck & Bus SE and Scania CV AB.

Within this Management System we have assigned the 18 priority raw materials to the aforementioned legal entities. Through this systematic approach, the Volkswagen Group companies are able to cover a broad range of raw materials and coordinate actions across the Volkswagen Group companies accordingly.

Although this report has been prepared in collaboration with and by the aforementioned legal entities, each single legal entity is only responsible for the content and described activities of the raw material for which it is in the lead (please see overview of the 18 priority raw materials → on page 17 of this report).

01

Foreword

Dear Readers,

The global mobility landscape continues to evolve at high speed. As the Volkswagen Group, our aspiration remains unchanged: we do not simply want to follow this transformation, we aim to actively shape it as The Global Automotive Tech Driver.

Rather than focusing solely on long-term objectives, our Group Strategy "Mobility for Generations" provides the framework to guide our transformation while enabling us to adapt swiftly where needed. At its heart lies our commitment to responsible supply chain practices, from clear contractual expectations for business partners to systematic due diligence for critical raw materials, integrating sustainability considerations across relevant sourcing stages.

Through our Raw Materials Due Diligence Management System and our global Sustainability Procurement network, we again carried out a comprehensive assessment of 18 prioritized raw materials in 2025. Our efforts focused on identifying and mitigating human rights and environmental risks, supported by OECD aligned methodologies, structured risk assessments, stakeholder dialogues and grievance insights. We intensified our collaboration with suppliers and upstream partners, including deeper engagement on regulatory expectations and sustainability requirements as well as strengthened involvement in relevant international initiatives and industry platforms. These collaborative formats enhance transparency, audit practices, and implementation of preventive and corrective measures across our supply chains.

Concrete developments on the ground included expanded audit programs for battery materials and mica; refined specification sheets for aluminum, leather and natural rubber; and strengthened risk monitoring and mitigating processes in complex global value chains. These examples reflect our conviction that resilient and sustainable supply chains are the result of long term cooperation and shared responsibility.

Now in its sixth edition, this report details the progress we achieved in 2025 and highlights how we refined our processes across brands and regions. We recognize the challenges of operating within global, complex and fragmented supply chains and aim to continue strengthening our approaches by addressing emerging risks where appropriate and working with our partners to support resilient and responsible supply networks.

Looking ahead to 2026 and beyond, we will continue preparing for evolving sustainability expectations, strengthening our risk management frameworks and scaling common standards and tools across the Group. Learning, adapting and improving remain central to this journey.

We hope you find this report informative and invite you to share your feedback with us at sustainability@vwgroupsupply.com. Further information on environmental, social and governance (ESG) topics is available on the Group's corporate website and in the 2025 Annual Report.

Karsten Schnake
Member of the Extended Executive Committee responsible for Group Procurement
Member of the Board of Management of the Volkswagen Brand responsible for procurement

02

General Disclosures

Responsible Supply Chain (ReSC) System

As one of the world's largest automotive manufacturers, the Volkswagen Group manages global supply chains that encompasses more than 63,000 supplier locations in 93 countries, representing a vast and highly complex network of relationships and logistics. To illustrate this scale: if we were to invite one representative from each tier-1 supplier to a supplier conference, we would need to rent our home football stadium, the Volkswagen Arena in Wolfsburg, more than twice. Including suppliers from all subsequent tiers would likely fill every stadium in Germany's top three football leagues combined.

We acknowledge our significant impact on people and the planet along with our responsibility to lead in upholding human rights and environmental stewardship. Sustainability is an important element of our procurement strategy, and we are committed to responsible and transparent business conduct.

Our policy on sustainable materials is based on global normative guidelines, including in particular

— the UN Universal Declaration of Human Rights
— the Core Labour Standards of the International Labour Organization (ILO)
— the UN Guiding Principles on Business and Human Rights
— the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
— the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
— the principles of the UN Global Compact.

The Volkswagen Group continuously monitors and adapts its risk management approach in procurement to meet the requirements of new laws and prepare for upcoming regulations at both the national and international level, such as the → **EU Battery Regulation (EUBR)** and the → **EU Deforestation Regulation (EUDR)**. The effective date of due diligence requirements under the EUBR has been postponed to August 2027, but all key requirements have already been integrated into our processes. Preparations for EUDR compliance have also been commenced, with a focus on traceability and risk mitigation for agricultural raw materials such as natural rubber and leather.

We identify, assess and address the risks in our supply chains through our Responsible Supply Chain system and have prioritized 18 high-risk raw materials for more in-depth risk management through our Raw Materials Due Diligence Management System (RMDDMS).

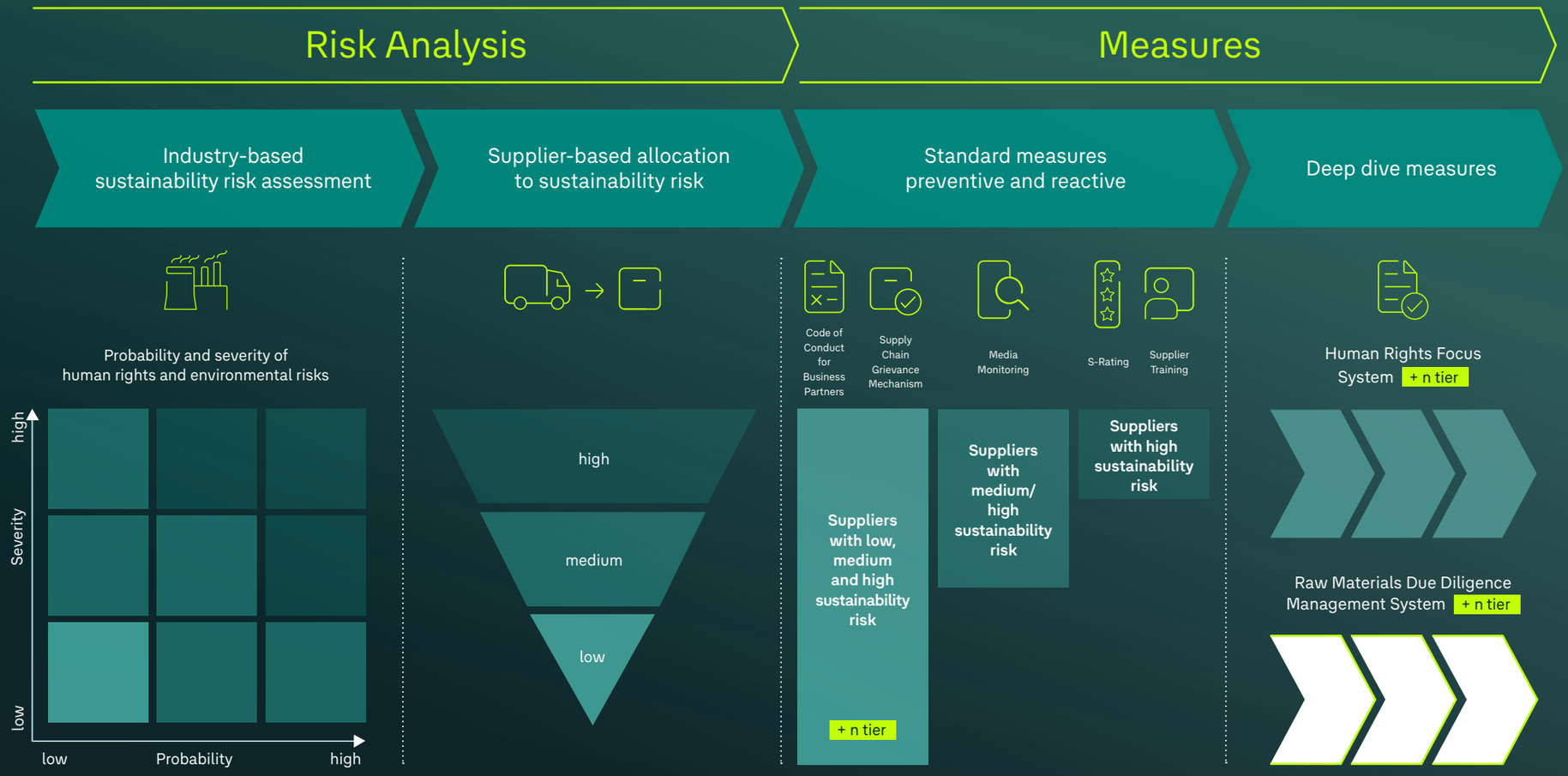
For the battery raw materials (lithium, nickel, cobalt and natural graphite), mica and leather specific due diligence processes have been established, such as mandatory specification sheets and audit requirements. Through PowerCo, the Volkswagen Group has started to vertically integrate battery cell development and production within the Group. In 2025, the Volkswagen Group's battery manufacturer PowerCo started the sourcing of lithium, nickel and cobalt products for the cathode active material value chain. For more information see the section on → **Battery Materials** in this report.

The Volkswagen Group's overarching approach to sustainability management in our supply chains is the Responsible Supply Chain (ReSC) system. This system includes regular risk analyses and proactive and reactive standard measures for our suppliers, such as the Code of Conduct for Business Partners, the supply chain grievance mechanism, media monitoring, the Sustainability Rating (S-Rating), and training for suppliers and employees. The implementation of the ReSC system is anchored in binding internal policies and procedural instructions. Its further development and oversight are coordinated by Group Procurement Sustainability together with Compliance, Legal and the worldwide Sustainability Procurement Network to ensure consistent application across all Group-controlled companies.

While the ReSC is an important approach to preventing and minimizing human rights, social and environmental risks in the Volkswagen Group's supply chains, we recognize that many of the most severe human rights and environmental risks occur further upstream in the supply chain, particularly in the raw materials sector, where additional measures are necessary to mitigate risks. To address these risks, the RMDDMS is embedded in the ReSC system as one of the in-depth measures that extend to the more remote tiers of the raw material supply chain.

The various procedures and measures of the Responsible Supply Chain system are detailed in our **2025 Annual Report (pages 372–379)**. Meanwhile, this Responsible Raw Materials Report 2025 highlights the progress achieved in the reporting year, the RMDDMS and our 18 priority raw materials.

Responsible Supply Chain (ReSC) System



Raw Materials Due Diligence Management System (RMDDMS)

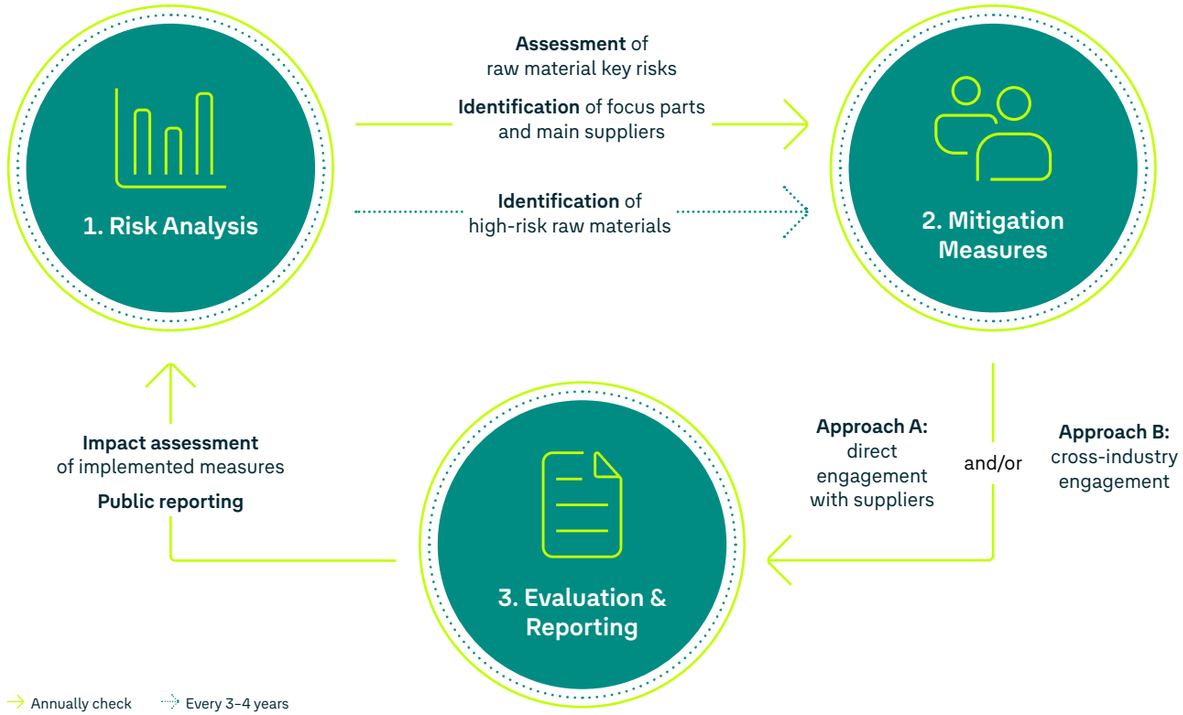
The Volkswagen Group's supply chains are extremely complex, globally distributed and subject to constant change. A single product's supply chain can span more than eight tiers, with one vehicle component involving several hundred suppliers and sub-suppliers. We therefore apply a risk-based approach, prioritizing key focus areas in our due diligence efforts.

Within the Raw Material Due Diligence Management System (RMDDMS), our activities target direct suppliers as well as upstream n-tier supply chains for the 18 raw materials identified as high-risk priority raw materials. The management system outlines the steps we take to identify, assess, prevent and mitigate actual and potential adverse effects in the supply chain. It also aims to ensure that our sourcing activities do not contribute to conflict, such as by indirectly supporting non-state armed groups in the extraction, transport, trade, handling or export of raw materials.

The RMDDMS strives to align with key international standards, including the **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Minerals Guidance)**, the OECD–FAO (Food and Agriculture Organization) Guidance for Responsible Agricultural Supply Chains, and the OECD Due Diligence Guidance for Responsible Business Conduct. Building on the OECD Minerals Guidance's five-step framework, it forms the foundation for compliance with due diligence requirements such as those under the EUBR and the German Supply Chain Due Diligence Act (LkSG).

We conduct a regular risk-based due diligence cycle, anchored in identified priority high-risk raw materials and their main applications. Annual raw-material-specific risk analyses for each of these priority materials inform tailored risk management measures (including analysis as well as preventive and reactive measures). The measures address either general or supplier-specific risks in a particular raw material supply chain. Progress of these mitigation measures is monitored, evaluated and reported.

Raw material due diligence cycle



As the basis for our management approach, we have set out our goals and commitments with regard to our raw material supply chains in the **Volkswagen Group's Responsible Raw Materials Policy**, which was updated in 2024 to cover new legislation such as the EUBR.

RMDDMS Governance

The processes and responsibilities of the RMDDMS are outlined in internal Volkswagen Group guidelines and handbooks, which are regularly updated, including in 2025.

In line with the OECD Minerals Guidance, the RMDDMS is overseen by a senior-level steering committee comprising senior procurement sustainability managers from all relevant Volkswagen Group brands and regions, including the head of global supplier risk and sustainability management of Volkswagen Group Procurement. The steering committee meets quarterly to approve and monitor RMDDMS activities and measures.

The Sustainable Supply Chain team, a working group of sustainability managers from Volkswagen Group brands' procurement departments, coordinates the due diligence activities. Each of the 18 identified priority materials is assigned to a "raw material lead", one brand representative, to ensure deep expertise and continuous engagement with relevant suppliers and stakeholders. This raw material lead coordinates and implements RMDDMS activities for one raw material across the Volkswagen Group. During the reporting period, the working group convened biweekly online and twice in person.

Driven by increasing regulatory expectations, we continued to strengthen our internal reporting and documentation over the reporting period. Our internal sustainability database captures sustainability information on the 18 priority materials and their supply chains, including risk analyses, sustainability ratings, grievance cases, mitigation measures and more. The data is cross-checked against global media reports and sanction lists to identify areas for action, with results reported to the steering committee on a regular and ad hoc basis.

Core measures of the ReSC system and RMDDMS

Despite significant variations in the challenges and approaches to solutions across high-risk raw materials, several tools have proven particularly effective within the RMDDMS framework. These are outlined below.

Sustainability Requirements for Suppliers

As a general and mandatory component of Volkswagen Group's contracts with direct suppliers, we use a Code of Conduct for Business Partners (CoC BP), which sets out our expectations towards business partners with regard to sustainability. The requirements cover key human rights, environmental, social and compliance standards; transparent and fair business relations; and due diligence for supply chains of minerals from conflict-affected regions. They are based on international standards as well as objectives, rules and policies of the Volkswagen Group. Our tier-1 suppliers are also requested to meet their due diligence obligations along their supply chains. The Code of Conduct for Business Partners (CoC BP) is a mandatory component of all contracts.

Since 2019, the Volkswagen Group has applied the Sustainability Rating (S-Rating) as a mandatory due-diligence instrument for suppliers identified as having an elevated sustainability risk. The S-Rating evaluates compliance with the Group's sustainability requirements and supports continuous supplier improvement. It is based on a Self-Assessment Questionnaire (SAQ) and, where necessary, on-site audits. For procurement activities involving critical raw materials, the Volkswagen Group applies additional, material-specific due diligence requirements to ensure responsible sourcing.

The S-Rating process was updated in 2025 to ensure that the additional sustainability requirements for critical raw materials such as battery raw materials, mica or leather are met by our suppliers. A positive S-Rating is a mandatory prerequisite for high-risk suppliers to enter into a business relationship with any Volkswagen Group brand. More information can be found at www.vwgroupsupply.com.

For selected high-risk raw materials, we use contractually binding **sustainability specification sheets** as a key component of our raw material due diligence. These specification sheets define the required sustainability standards and set out our raw-material-specific expectations for our suppliers in terms of human rights and the environment. They may include requirements for supply chain transparency as well as the implementation of industry sustainability standards (such as the → Initiative for Responsible Mining Assurance, IRMA, standard) at important pinch points in the supply chain. In 2025, updated specification sheets were introduced for certain raw materials, including mica and leather, to address social and environmental risks such as child labor and deforestation. Specifications for battery materials were reviewed and updated to ensure alignment with the EUBR. The specification sheet for aluminum was revised to incorporate decarbonization measures and alignment with ASI certification standards.

Direct business partners who supply focus products containing any of the raw materials in scope are requested to comply with the specification sheets for all new contracts. We also expect our direct suppliers to pass on these requirements, in addition to the Code of Conduct for Business Partners, to their respective suppliers and up the supply chain.

To date, we have developed specification sheets for the following priority raw materials:

- **battery raw materials** (lithium, cobalt, nickel and natural graphite; rolled out across the Volkswagen Group in 2020, updated in 2025)
- **aluminum** (rolled out across the Volkswagen Group in 2023, updated in 2025)
- **mica** (rolled out across the Volkswagen Group in 2023, updated in 2025)
- **leather** (rolled out across the Volkswagen Group in 2023, updated in 2025).

Audits

Audits are one of the key tools used to assess risks in our upstream supply chains and to define mitigation measures. They are utilized alongside other tools used for our raw material due diligence and help promote transparency, compliance, and a culture of continuous improvement and dialogue throughout the supply chain.

To address the complexity and diversity of raw material supply chains, the Volkswagen Group applies a tiered assessment system with different audit formats to systematically evaluate the sustainability performance of our suppliers.

Supplier audits on behalf of the Volkswagen Group are used at regular intervals or on a case-by-case basis to verify that our suppliers comply with our requirements. These audits are carried out by qualified auditors which may include internal teams or external service providers mandated by the Volkswagen Group. On-site audits can identify gaps in supplier performance as well as risks at indirect suppliers' sites that need to be mitigated through the direct supplier. In case of observed non-conformities, gaps or risk exposures, a corrective action plan (CAP) is prepared. Follow-up audits can be conducted to verify the effectiveness of the measures implemented.

Initially, the focus of the Volkswagen Group's battery audit program was on cobalt, due to the severity of the human rights risk associated with this mineral. From there, it was expanded to other raw materials used in batteries, and we worked our way up the supply chain, moving from our battery suppliers to precursors, refiners, processing plants and mines. In 2025, the audit program was further expanded to include lithium, nickel and natural graphite, with enhanced compliance checks for the EUBR and stricter traceability requirements.

External audit and certification programs form another part of our strategy. Several global initiatives offer voluntary audit-based certification for suppliers according to a standard set of requirements, including IRMA, the Aluminium Stewardship Initiative (ASI) and the Leather Working Group (LWG). The Volkswagen Group also uses **databases** with audits conducted by global initiatives, and we encourage mine operators to certify mines through international standards such as IRMA. In 2025, the Volkswagen Group strengthened its collaboration with these initiatives to ensure compliance with updated sustainability standards.

In addition to on-site audits, the Volkswagen Group has further expanded its engagement with mine-level and mid-stream suppliers through **Supplier Engagement Programs**. In collaboration with external partners, these programs aim to encourage continuous improvement of sustainability practices in raw material supply chains and bridge the gap where third-party certifications are not (yet) achievable. Through intensive dialogue and on-site visits by the external providers (experts for topics such as biodiversity, occupational health and safety), we aim to increase transparency and mutual understanding, further promoting good practices and improvement opportunities across the lower tiers of the supply chains.

Through a combination of these approaches, the Volkswagen Group can more effectively monitor its supply chains to ensure that they meet rigorous environmental and human rights standards. A new audit overview table for 2025 includes expanded coverage for battery raw materials, aluminum, mica, leather and 3TG, reflecting updated compliance and certification requirements. This table provides an overview of how we use audits across various raw materials in our supply chains.

Audits

	Tin | Tantalum | Tungsten | Gold	Battery Raw Materials (midstream)	Battery Raw Materials (upstream), Platinum Group Metals (PGM)	Leather	Aluminum	Mica
Audit standard	Responsible Minerals Assurance Process (RMAP) developed by the Responsible Minerals Initiative (RMI)	RMAP+ und ESG Facility Standard developed by the Responsible Minerals Initiative (RMI) with strong support from the Volkswagen Group	Initiative for Responsible Mining Assurance (IRMA) Standard for Responsible Mining	Standard developed by the Leather Working Group (LWG)	ASI Performance and ASI Chain of Custody (CoC) standards developed by the Aluminium Stewardship Initiative (ASI)	Global Workplace Standard for Mica Processors
Scope of risks assessed in the audit	Annex II risks as defined by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas	Annex II risks (see column to the left), as well as additional risks from the due diligence requirements of the EUBR	Environmental impact, social impact, health and safety, business integrity	Business and operations management, environmental and social impact, occupational health and safety, compliance	ASI Performance Standard: 62 environmental, social and governance principles such as business integrity and trans-parency, water and biodiversity, and human and labor rights ASI CoC Standard: requirements for a CoC material, including supply chain due diligence and material accounting	Environmental management system, occupational health and safety, fair labor practices
Tier(s) that have been audited	Smelters and refiners	From battery cell suppliers to smelters and refiners	Mine sites	Tanneries	All stages of the aluminum supply chain	Mica processors

Supplier Dialogues

We view collaboration as key to implementing due diligence along the supply chain. We can only effectively assess and manage human rights and environmental risks in our supply chains if we work together with our key suppliers and share a common understanding. To this end, the Volkswagen Group engages directly and on an ongoing basis with key suppliers of focus parts containing one or more of the 18 prioritized raw materials. We also offer them a wide range of support, including training and initiatives to participate in.

During the reporting period, we deepened this dialogue with key suppliers and sub-suppliers, e.g., through joint workshops on EUBR compliance, EUDR traceability requirements for agricultural raw materials and implementation of raw-material-specific specification sheets. With some of our suppliers, meetings take place on a monthly or biweekly basis to discuss the requirements of evolving regulations, due diligence measures and efforts, and emerging risks. Where possible, we prioritize in-person interactions, for example by hosting suppliers at our sites or visiting the facilities of major battery suppliers in China and Korea, as we did in 2025.

Collaboration with External Partners and International Initiatives

The Volkswagen Group also aims to address human rights risks in the upstream supply chain beyond its contractual relationships. To this end, we engage with various stakeholders as an exercise to increase our leverage while at the same time benefiting from the exchange of knowledge. We also take part in conferences and workshops and meet with NGOs, associations, local partners and media representatives. We see value in engaging with NGOs and community representatives at both the national and international level.

In addition, the Volkswagen Group and its brands are active members of a number of global initiatives, both cross-industry and raw-material-specific. Together with our partners, we aim to share knowledge, develop standardized risk assessment tools, and introduce standards for responsible raw material supply chains in terms of human rights and the environment. We believe that these activities help us make progress toward transparent and sustainable supply chains and promote more responsible business practices around the world.

For a description of selected initiatives of which the Volkswagen Group is a member, see the section on → Commitment to Initiatives.

Sustainability Training and Workshops

Another key instrument in our approach is the systematic training of both our suppliers and our own employees. Sustainability forms an integral part of the skill profile for all Procurement staff. Sustainability training—offered through web-based, online or face-to-face formats—covers topics such as corporate responsibility; legal frameworks; and requirements, processes, and management systems. A dedicated component focuses specifically on sustainability in raw materials.

To support the continuous development of our suppliers, sustainability managers within Volkswagen Group Procurement also offer sustainability training courses and workshops for suppliers at selected locations and online. In 2025, these training sessions were expanded to include modules on the EUBR, the EUDR and other raw-material-specific requirements. Furthermore, an e-learning module on sustainability is available to current suppliers in eight languages. We also offer voluntary human rights training for suppliers.

Supply Chain Grievance Mechanism

The supply chain grievance mechanism is an important component of responsible supply chain management. It serves to investigate breaches or suspected violations of the Code of Conduct for Business Partners by our direct or indirect suppliers. The mechanism is accessible via the hotline and channels of the Volkswagen Group's whistleblower system and is open to all potentially affected stakeholders, whether employees of suppliers or representatives of local communities or civil society organizations. Reports can be submitted confidentially and anonymously. Through the grievance mechanism, we review and address concerns related to potential human rights and environmental impacts within our supply chain and implement appropriate measures, e.g., audits. In cases of serious violations, suppliers may be blocked from receiving new contracts. Detailed information and KPIs for 2025 can be found in **the Volkswagen Group's ESG Factbook (Supply Chain tab)**. In 2025, the grievance mechanism was enhanced with automated case tracking and integration into our sustainability database, enabling faster escalation and linkage to CAPs. Additional reporting channels were introduced for suppliers in high-risk raw material categories (e.g., cobalt, mica, leather) to further improve accessibility and transparency.

Who can report[1]	How can reports be made[1]	What is the outcome
All suppliers' staff members	**In person** Via the Compliance contact person **Ombudspersons (external lawyers)** www.ombudsmen-of-volkswagen.com	Breaches identified and categorized by their severity
Civil society organizations	**Email** io@volkswagen.de **Online Reporting Channel** www.goto.speakup.report/en-GB/volkswagen/home	→ Serious breaches
Representatives of communities in the immediate vicinity of our production locations	**Mail** Central Investigation Office, Mail Box 1717, 38436 Wolfsburg/Germany **24/7 hotline** +800 1818 952 (have the corresponding organizational code **122203** ready)	Respective suppliers might be temporarily blocked from being awarded new contracts Can lead to termination of supplier relationship with the Volkswagen Group

1 Excerpt from available options

Human Rights and Environmental Risks in Scope

We review our RMDDMS risk categories regularly to incorporate emerging regulatory requirements such as the EU Battery Regulation and industry best practices. After an update at the beginning of 2024, minor adjustments were made during the reporting period, as shown in the graphic below. In line with the European Sustainability Reporting Standards (ESRS), these risks in scope are organized into seven sub-categories: Environmental risks are grouped into the sub-clusters pollution, waste, water and biodiversity. Social risks are covered by the sub-clusters human rights and working conditions. The impact of supply chain activities on local communities is included in the sub-cluster communities' rights.

Environment

Pollution

- Hazardous substances, especially production and use of pollutants and hazardous chemicals
- Air pollution
- Noise and vibrations

Water

- Water pollution, including seabed and marine environment, water consumption, impacting the amount of water (flood or drought) and access to water and sanitation

Waste

- Handling, storage and disposal of waste and residues

Biodiversity

- Soil pollution, soil erosion, land use and land degradation
- Loss of biodiversity, including damage to natural habitats, wildlife, plants and ecosystems/ ecosystem services

Human Rights

Human rights

- Child labor
- Torture
- Forced labor and compulsory labor, including slavery and serfdom
- Direct or indirect support of non-state armed groups and/or public or private security forces
- Any form of discrimination

Working conditions

- Health and safety at work
- Trade union freedoms and freedom of association
- Payment of appropriate and fair wages/salaries
- Plant safety

Community Life

Communities' rights

- Forced evictions and/or expropriations of land, forests, bodies of water
- Protection of the rights of indigenous and local people
- Causing harmful soil change, water and air pollution, noise emissions, excessive water consumption, which affect natural resources and health

The risk categories are listed in abbreviated form in Section 04 of this report for every raw material.

Priority Raw Materials

For the 2025 reporting period, consistent with the prior year, our RMDDMS covered 18 priority raw materials in total. Using an OECD-aligned risk-based methodology, we selected these materials based on the severity of potential human rights and environmental risks. Our assessments draw from sources like Maplecroft's global risk data, raw-material-specific analyses and other reports that outline sustainability risks in supply chains. Additionally, we reviewed grievance mechanism cases and collected relevant data through outreach to stakeholders such as NGOs and tier-n suppliers. We also factored in our leverage within supply chains, sometimes prioritizing materials with lower risk severity but greater potential for impact through our influence.

Battery Raw Materials

Lithium	Cobalt	Nickel	Natural Graphite
VOLKSWAGEN GROUP	VOLKSWAGEN GROUP	VOLKSWAGEN GROUP	VOLKSWAGEN GROUP

Biogenic Raw Materials

Cotton	Leather	Natural Rubber
VOLKSWAGEN GROUP		VOLKSWAGEN GROUP MAN

Other Metals and Minerals

Aluminum	Copper	Magnesium	Mica

PGM[1]	REE[2]	Steel	3TG[3]
SCANIA	VOLKSWAGEN GROUP	VOLKSWAGEN GROUP	VOLKSWAGEN GROUP

1 PGM — Platinum Group Metals
2 REE — Rare Earth Elements
3 3TG — Tin, Tantalum, Tungsten and Gold

>20

Raw material experts across our group

Raw Material Lead Brands in RMDDMS are
Volkswagen | Audi | Porsche | MAN | Scania

Limitations

2025 marked the sixth year since the introduction of the RMDDMS across the Volkswagen Group as our risk-based approach to managing the risks of our products' supply chains. We continuously make improvements for each of the individual raw materials and take steps to further strengthen and enhance the management system. While we are pleased with the progress achieved, certain limitations and challenges persist.

Navigating regulatory uncertainty

In recent years, the European Union has introduced legislation on sustainable supply chains aimed at advancing environmental preservation, social responsibility and good governance. This includes the → **EU Battery Regulation (EUBR)** and the → **EU Deforestation Regulation (EUDR)**, both of which are key pieces of legislation with the potential to accelerate due diligence efforts in our high-risk raw material supply chains, namely cobalt, lithium, nickel, natural graphite and natural rubber.

These new legal frameworks have introduced more stringent documentation and reporting obligations. In response, we have enhanced the RMDDMS by enhancing our compliance checks and linking grievance cases more systematically to corrective action plans (CAPs), particularly for materials such as cobalt. However, the implementation of these new requirements poses considerable challenges, as it calls for extensive documentation and detailed supply chain mapping back to the mine or farm of origin. Moreover, ongoing regulatory ambiguities, short-term application delays and delayed guidance have added complexity to planning and execution within an ambitious timeline. For further information on the automotive industry's position regarding the EUDR, please refer to the position paper published by the **German Association of the Automotive Industry (VDA)**.

Lack of a level international playing field

While due diligence expectations have increased at the EU and European national levels, legal requirements for businesses in many other regions are not evolving at the same pace. This places an increased burden on European companies and in some cases may even put EU buyers at a competitive disadvantage, as non-EU suppliers perceive the increased due diligence and documentation procedures as onerous. This is particularly concerning in cases where EU companies are highly dependent on a limited number of suppliers or supply regions or in scarce raw material markets.

Challenges of multi-tiered global supply chains

Fragmented and complex supply chains continue to challenge the flow of sustainability and compliance information, as well as risk assessment and mitigation activities. In the reporting year, we continued our efforts to improve transparency within our supply chains and collaborate with our suppliers and sub-suppliers. Identifying and addressing risks from upstream actors in distant tiers is particularly difficult where the Volkswagen Group lacks direct contractual relationships. For example, we found that some suppliers were reluctant to disclose their sub-suppliers' identities due to perceived antitrust and competition concerns.

Limits of corporate influence and the role of governments

Certain challenges in responsible supply chain management lie beyond our control. According to the UN Guiding Principles on Business and Human Rights, governments are obliged to protect human rights, while businesses must respect them. Governments play a crucial role in creating an enabling environment for responsible business conduct through measures such as promoting good governance (e.g., fighting bribery and corruption), establishing and enforcing relevant legal frameworks, and ensuring that state security forces do not infringe on human rights. However, we are aware of the complex challenges governments face in trying to ensure and protect human rights and the environment.

A pertinent example is the protection of human rights in regions with artisanal and small-scale mining (ASM), which affects the downstream sector. While ASM is associated with poor health and safety standards and child labor and may operate outside the formal economy with little or no regulation, it is an important source of income for a large number of people in the countries concerned. Addressing poor labor and environmental practices in global supply chains without undermining livelihoods for vulnerable populations requires a careful balance.

Given these limitations and the vast scope of our raw material supply chains, substantial work remains ahead. Still, we observe growing acceptance of due diligence concepts in raw material sourcing, with more supply chain actors addressing human rights and environmental risks. We remain dedicated to collaborating with direct suppliers and the broader industry to drive further progress.

03

Commitment to Initiatives

Collaboration with other industry stakeholders and participation in initiatives form a cornerstone of our raw material due diligence strategy. Through these engagements, the Volkswagen Group joins forces to address human rights and environmental risks along the supply chains.

Standards and audits have become increasingly important in identifying and mitigating risks. Multiple initiatives have established robust due diligence standards tailored to specific raw materials and fields of activity and are working to encourage and assist downstream actors in implementing these standards.

The Volkswagen Group takes an active role in various initiatives dedicated to advancing supply chain sustainability. These include both cross-industry initiatives addressing multiple raw materials and specialized initiatives focusing on particular materials. Our engagement aims to enable efficiencies in multi-tier supply chains through aligned tools, e.g. for collecting sustainability data. In 2025, alongside several raw-material-specific initiatives, we continued our active participation and leadership in key activities under the overarching programs listed below.

For more details on our participation in raw-material-specific initiatives, please see the respective raw material snapshots in → Section 04 of this report. A full list of our membership and participation in industry groups and initiatives can be found in → Annex II at the end of this report.

Initiative for Responsible Mining Assurance (IRMA)

The Volkswagen Group is a committed member of the Initiative for Responsible Mining Assurance (IRMA) and also plays an active role in the IRMA Buyers Group and the Mining Engagement Team.

IRMA is a multi-stakeholder alliance that advocates for more socially and environmentally responsible mining through independent assessment of mine sites against a comprehensive standard covering human rights, community rights, corruption prevention, health and safety, and environmental protection.

The Volkswagen Group has committed to progressively applying the IRMA Standard for Responsible Mining in its battery supply chains, ensuring that in high-risk regions battery raw materials are sourced only from mines audited according to the IRMA Standard. IRMA is our preferred mining assurance standard due to its strong focus on social consultation and its recognition of the concept of free, prior and informed consent (FPIC) for affected communities. During the reporting year, we actively engaged in the public consultation process for the IRMA Standard V2.0 to ensure it reflects the latest regulatory changes such as the EU Battery Regulation (EUBR) as well as the Volkswagen Group's specific sustainability requirements. We contributed insights to this process from the perspective of an automotive manufacturer in the downstream value chain.

Scaling IRMA across the mining industry and raw material supply chains is critical to enabling the Volkswagen Group and other downstream brands to meet responsible sourcing objectives. The number of mines interested in and committed to IRMA is increasing, but coverage is not yet universal, so we remain committed to joint efforts to increase leverage and uptake of the standards.

In 2025, IRMA engagement covered around 40 countries, with five new sites and five companies joined in the reporting year. We welcome the first audit in DR Congo as a milestone. For cobalt (18%), lithium (44%), and PGM (36%), IRMA-certified materials represent a significan proportion of global supply. The IRMA Buyers Group grew by nine to 30 downstream companies. This development underlines the progress that collective industry action through IRMA can achieve beyond any single company's contribution.

In 2025, members of the Volkswagen Group's Sustainable Supply Chain team participated in the IRMA National Level Forum, focused on Indonesia and the growing nickel industry. The event helped to define focus areas and priorities such as industry and civil society engagement and improved communication with local stakeholders.

During the reporting year, IRMA and the RMI signed a memorandum of understanding to enhance alignment and better support shared members. As a member of both initiatives, the Volkswagen Group strongly welcomes this collaboration to create synergies and streamline approaches and work packages.

Responsible Minerals Initiative (RMI)

The Responsible Minerals Initiative (RMI), an initiative of the Responsible Business Alliance (RBA), is a multi-industry initiative contributing to the development and uptake of a range of tools and resources focused on mineral supply chain due diligence. The tools include independent third-party assessments, mineral reporting templates and guidance documents on responsible sourcing of all minerals/metals.

Through the RMI, the Volkswagen Group collaborates with partners across industries and supply chains to foster dialogue; harmonize due diligence tools; and drive collective, standardized solutions. During the reporting year, the Volkswagen Group participated in several of the RMI's material-specific working groups (gold, nickel and cobalt/copper), which encourage supplier assessment against standards and leverage collective influence to drive responsible business practices upstream. In 2024 and 2025, we were also a key driver behind the revision, development and pilot phase of the RMI's updated RMAP+/SCDDP (Responsible Minerals Assurance Process/Supply Chain Due Diligence Plus) and ESG Facility Standard. The new standard suite expands the due diligence toolkit for responsible sourcing, processing and manufacturing of raw materials to meet new and emerging regulatory requirements (e.g., the due diligence requirements of the EUBR) and to encourage continuous improvement of supplier practices across a comprehensive set of indicators.

Beyond active engagement of Volkswagen Group representatives in RMI's work, the Group also provides financial support to the RMAP Assessment Fund. This fund covers the costs of RMAP assessments amd re-assessments for for financially constrained actors, enabling shared burden across the supply chain.

DRIVE Sustainability

The Volkswagen Group is a founding member of DRIVE Sustainability, an industry-led partnership of 16 leading automotive companies under the umbrella of CSR Europe. Drive Sustainability is dedicated to transforming the automotive value chain toward circularity and sustainability.

Within the Raw Materials Working Group, we contributed to the update of relevant raw material profiles in the platform Raw Material Outlook, a key initiative that analyzes 20 critical raw material value chains by mapping value chains and identifying key sustainability risks.

Another tool used by Drive Sustainability members is the Sustainability Assessment Questionnaire (SAQ). This common questionnaire for evaluating sustainability aspects of suppliers is also used by the Volkswagen Group as a basis for the Sustainability Rating assessment (S-Rating; see → page 11).

During the reporting year, the Volkswagen Group was a key driver in the development of a specific battery supplement to the SAQ (BSAQ), which explicitly covers the risk categories listed in the due diligence requirements of the EUBR and can be applied to all levels of the battery supply chain from tier 1 to tier n. Its standardized approach significantly reduces the effort required of sub-suppliers, as it needs to be completed only once and can be easily shared across multiple customers. The BSAQ is currently being rolled out industry-wide. The Volkswagen Group encourages all suppliers in the battery value chain—both direct and indirect—to demonstrate their sustainability performance through the BSAQ and specific requests in high-risk cases.

Highlights 2025

Nickel

The Volkswagen Group is working with automotive partners and the German Agency for International Cooperation (GIZ) to launch the on-the-ground 'Nickel Impact Programme Indonesia' (NIPI).

→ See also Raw Material Snapshot on nickel, page 37

Lithium

We also successfully concluded the Responsible Lithium Partnership in the Salar de Atacama salt flat in Chile, which now continues as an independent foundation.

→ See also Raw Material Snapshot on lithium, page 30

Cobalt

The Volkswagen Group has successfully completed a five-year engagement in Cobalt for Development (C4D), delivering tangible outcomes such as vocational training and agricultural livelihood programs in the Democratic Republic of the Congo (DRC), along with a joint Lessons Learned Paper.

→ See also Raw Material Snapshot on cobalt, page 34

Mica

The Volkswagen Group, through Porsche's leadership, supports projects in Madagascar that aim to mitigate child labor and improve working conditions in mica mining and processing while also supporting the Responsible Mica Initiative's community programs in mica-dependent villages in Jharkhand and Bihar, India, over several years.

→ See also Raw Material Snapshot on mica, page 52

Global Platform for Sustainable Natural Rubber (GPSNR)

For the first time, a representative of the Volkswagen Group attended the annual GPSNR meeting in Singapore, contributing our industry perspective of an automotive OEM.

→ See also Raw Material Snapshot on natural rubber, page 71

Standards & tools

As active members of **IRMA** and the **RMI**, we engaged in revising and updating the harmonized standards of **IRMA Standard V2.0** and the **RMI's RMAP+/SCDDP and ESG Facility** standards to align with regulatory requirements such as the EUBR. During the reporting year, IRMA and the RMI signed a memorandum of understanding to enhance alignment and better support shared members.

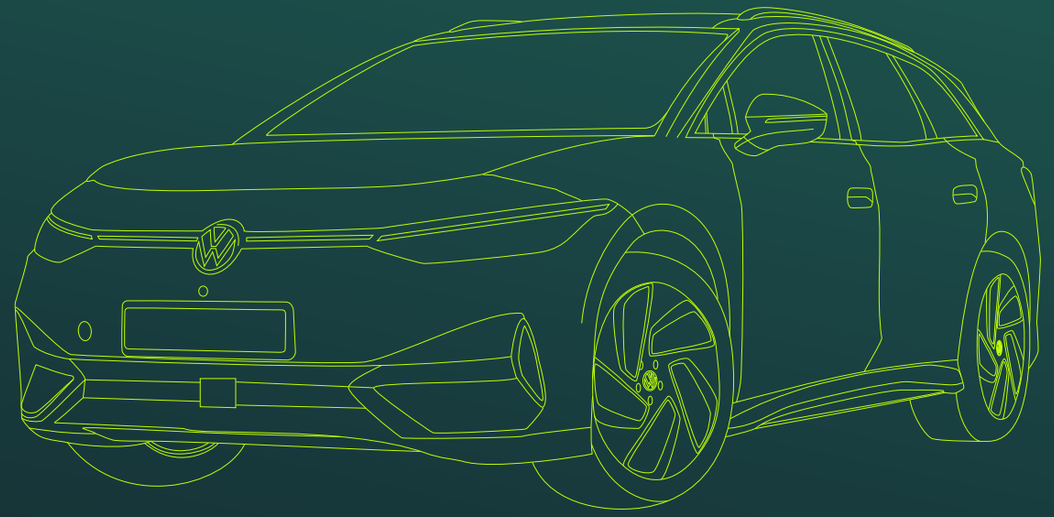
Within Drive Sustainability's battery working group, we helped develop the **Battery Sustainability Assessment Questionnaire (BSAQ)** as a supplement to SAQ 5.0, providing a standardized tool that significantly reduces sub-suppliers' effort and is now being rolled out across the industry.

04

Raw Materials

Battery Raw Materials

Lithium, nickel, cobalt and graphite are the key raw materials for lithium-ion batteries commonly used in electric vehicles.



Battery Raw Materials

- Lithium — Page 29
- Cobalt — Page 32
- Nickel — Page 35
- Natural Graphite — Page 38

Biogenic Raw Materials

- Cotton — Page 65
- Leather — Page 68
- Natural Rubber — Page 71

Other Metals and Minerals

- Aluminium — Page 42
- Copper — Page 45
- Magnesium — Page 47
- Mica — Page 49
- PGM — Page 53
- REE — Page 56
- Steel — Page 59
- 3TG — Page 61

The Volkswagen Group is committed to becoming a global leader in sustainable mobility, defined by a shift towards sustainable and electrified transportation solutions. Central to this effort is the accelerated adoption of electric vehicles to significantly reduce carbon emissions across the entire vehicle lifecycle. In line with this ambition, the Volkswagen Group seeks to ensure responsible and sustainable business practices across its supply chain, with a particular focus on the critical raw materials used in lithium-ion battery cells: lithium, nickel, cobalt and natural graphite.

To effectively address sustainability risks, we have established a comprehensive, integrated due diligence approach for these battery raw materials, guided by our overarching RMDDMS (see → page 9 of this report). This framework proactively addresses potential social and environmental risks, including human rights concerns, and ensures compliance with key regulatory requirements such as the German Supply Chain Due Diligence Act (LkSG) and the EU Battery Regulation (EUBR).

Battery Raw Materials in our Supply Chain

Due to their strategic importance for the energy transition and high supply risk, lithium, nickel, cobalt and natural graphite are classified by the EU as critical raw materials. At the Volkswagen Group, these four raw materials are among the 18 priority raw materials defined in our RMDDMS. Their significance is further emphasized in Annex X of the EUBR, which mandates due diligence measures for batteries containing these four raw materials.

In the reporting year, the Volkswagen Group mainly procured battery cells from suppliers several tiers away from the raw material origins. In 2025, the Volkswagen Group's battery manufacturer PowerCo started the sourcing of lithium, nickel and cobalt products for the cathode active material value chain.

For all battery raw materials, the Volkswagen Group manages sustainability topics through dedicated contacts for key battery suppliers. The Sustainable Supply Chain Team works closely together to prepare and coordinate due diligence processes for these raw materials in line with the EUBR.

Battery Specification Sheet

To ensure sustainable sourcing, we work closely with our key battery suppliers using a mandatory EV battery raw material specification sheet as a central due diligence tool. It requests suppliers to provide supply chain maps with verifiable information and to ensure supply chain transparency and comprehensive social and environmental risk analysis. They must also, upon request, complete the **Battery Sustainability Assessment Questionnaire (BSAQ)** developed by Drive Sustainability (see below) and/or provide third-party audit results, including corrective action plans. Suppliers must follow internationally recognized responsible sourcing practices, such as the OECD Due Diligence Guidance, and cascade these commitments to their sub-suppliers.

In 2025, the Battery Specification Sheet was reviewed and updated to align with the due diligence requirements of the EUBR. Additionally, it was made a mandatory component of the Volkswagen Group's supplier Sustainability Rating (S-Rating; see → page 11) and the procurement contracts respectively. This integration of requirements into the contracts advances EUBR readiness and clarifies expectations for suppliers.

Stakeholder Engagement

- Active involvement in initiatives to develop and leverage joint standards and tools
- Robust engagement and close dialogue with eight focus suppliers for batteries
- Intensified dialogues with upstream supply chain actors, e.g. nickel, lithium and cobalt processors
- Dialogue with potential notified bodies to ensure proactive compliance with regulations
- Engagement with experts and authorities on current developments and technologies
- Continuous dialogue with NGOs

Risk Assessment

EV batteries face significant challenges in raw material supply, as critical materials like lithium, nickel, cobalt and natural graphite are in high global demand but also associated with social and environmental concerns. The battery supply chain spans multiple stages, from metal extraction and refining to processing for cathode and anode production, battery cell manufacture and assembly, and recycling (end of life). Certain mining operations, particularly artisanal and small-scale mining (ASM), have been linked to human rights abuses, including child and forced labor, with poor safety conditions and severe environmental impacts such as water pollution and deforestation. Refining and processing remain highly concentrated in China, a key factor influencing supply chain dynamics. Further details on sources and risk profiles for each material are shown in the raw material dashboards on the following pages.

Our RMDDMS integrates risk scoping and assessment through three key phases aligned with EUBR principles: supply chain mapping and identification of relevant actors; ESG risk assessment and prioritization; and risk mitigation, monitoring and impact measurement.

In 2025, we further intensified **supply chain mapping** activities to match our desktop analysis with detailed data gathered by our business partners on supplier tiers and geographic locations. We also increased our capacity to enable more detailed and thorough reviews. Internal verification processes were strengthened to improve data accuracy and completeness, while monitoring tools and media screening continued to track supply chain issues in real time.

After mapping, risks are assessed and prioritized across social, environmental and governance dimensions. Our comprehensive n-tier supplier database consolidates risk analyses, insights obtained from Self Assessment Questionnaires (SAQs), grievance cases and results of on-site visits to support ongoing monitoring and the implementation of corrective measures. Based on these insights, selected n-tier suppliers undergo in-depth risk assessment.

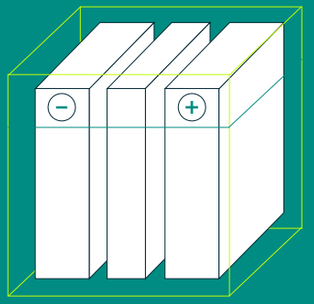
During the reporting year, the Volkswagen Group actively worked with other members of Drive Sustainability to develop a specific → battery supplement to the SAQ (BSAQ), which explicitly covers the risk categories listed in Annex X of the EUBR. The BSAQ is currently being rolled out industry-wide and can be applied to all levels of the battery supply chain. The BSAQ is designed as a **first-step screening** tool to identify potential ESG risks in the supply chain and establish the foundation for subsequent due diligence activities.

Preparing for the EU Battery Regulation (EUBR)

The EU Regulation concerning batteries and waste batteries (EU Battery Regulation) was adopted in 2023 and progressively replaced the Batteries Directive 2006/66/EC, with full implementation of the due diligence requirements from August 18, 2027. The primary objective of the due diligence requirements of the EUBR is to strengthen environmental sustainability and extend the lifespan of batteries and electronic devices used by consumers. The EUBR introduces comprehensive battery due diligence obligations for all economic operators that place batteries or battery-equipped products on the EU market. Annex X of the EUBR outlines an extensive list of raw materials and risk categories for battery due diligence, offering a far more detailed framework than existing legislation.

To prepare for the new regulation, the Volkswagen Group has thoroughly reviewed the RMDDMS to ensure integration of battery due diligence and adapted internal processes and tools to comply with the EUBR. However, sustainability has been an ongoing priority in our battery supply chains, with many of our existing responsible sourcing practices and internal processes already largely in line with the EUBR due diligence requirements.

In the reporting year, we finalized our processes to implement the requirements. Collaboration with cross-industry initiatives such as the RMI and Drive Sustainability focused on developing tools and harmonizing standards to facilitate compliance with the EUBR. In 2026, we will concentrate on scaling up and rolling out the tool and updated processes into contracts and agreements with suppliers.



Risk Mitigation

Despite these efforts, upstream battery raw material supply chains remain complex and fragmented, showing social and environmental risks amid frequent shifts in sub-suppliers driven by market dynamics, geopolitical tensions or technological innovations. Transparency and data availability continue to pose significant challenges, often compounded by changing supplier relationships.

Common **standards** therefore serve as an important tool to increase transparency and support due diligence activities. The Volkswagen Group is a member of the Initiative for Responsible Mining Assurance (IRMA) and has selected it as the preferred mining assurance standard due to its multi-stakeholder approach and recognition of free, prior and informed consent (FPIC). In addition, the Volkswagen Group engages in other key industry initiatives such as the Responsible Minerals Initiative (RMI) and Drive Sustainability, as we believe these initiatives help to drive harmonized approaches to risk mitigation and increase leverage through collective action.

In 2025, we actively participated in working groups on battery raw materials and the adaptation of existing standards to the EUBR requirements. During the consultation phase for IRMA Standard v2.0, the Volkswagen Group contributed insights from the perspective of an automotive manufacturer in the downstream value chain. The updated version is expected to be finalized and approved in 2026.

We were also involved in the revisions of the RMI's RMAP+ and ESG Facility Standard in 2024 and 2025 to ensure alignment with EUBR requirements, and we supported a pilot of the new standard at selected sites. The Volkswagen Group now applies the new RMAP+/SCDDP and the ESG Facility standards for all battery raw materials.

While progress has been made in standard adoption and independent verification, particularly for cobalt, some supply chain actors still lack familiarity with these processes. To bridge these gaps, the Volkswagen Group has launched Supplier Engagement Programs for both the mining and the mid-stream level, supported by external providers. The programs aim to assess and engage tiers in the upstream levels of the supply chain and encourage continuous improvement in their sustainability practices. Following an on-site assessment by experts, the suggested improvement actions can help the suppliers to proceed on a clear path towards third-party certification (for more information see → page 12).

During 2025, the Volkswagen Group conducted more than ten **audits and on-site assessments** of n-tier suppliers, covering cathode and anode manufacturers, refineries, and mine sites. These included both third-party certifications and on-site visits of external partners as part of our → Supplier Engagement Programs. These programs are being intensified with plans to increase the number of assessments in the near future.

The Volkswagen Group's Sustainable Supply Chain team closely collaborated with major battery suppliers and conducted on-site visits in Korea and China, where team members led workshops to discuss risk assessments and the requirements of the EUBR with regard to supply chains. These visits greatly improved cooperation, built trust and established a foundation for greater access to supply chain data. Topics included harmonizing sustainability requirements and discussing risk exposure in existing supply chains.

In the reporting year, our Sustainable Supply Chain team also participated in several **training sessions and workshops** by global initiatives on battery raw material supply chains, covering topics such as compliance requirements for the EUBR and supplier relations. For additional mitigation measures such as training sessions or on-the-ground projects, please see the sections on the individual raw materials.

Battery Recycling

To reduce our consumption of resources, the Volkswagen Group is working on a recycling concept for batteries, operating a pilot facility for recycling high-voltage vehicle batteries at the site in Salzgitter (Germany). In addition, we are exploring strategic partnerships in the battery value chain to comprehensively close the loop for high-voltage batteries. More information is available in the 2025 Annual Report (pages 319–320).

PowerCo

The Volkswagen Group is one of the few automotive manufacturers globally that pursues end-to-end control of EV battery technology. Established in 2022, PowerCo vertically integrates battery cell development and production within the Volkswagen Group, from the procurement of raw materials to recycling. The first cell factory in Salzgitter began operations in late 2025; the cell factories in Valencia (Spain) and St. Thomas (Canada) will follow within the next years. All sites are designed to operate using electricity from renewable sources. More information is available in the 2025 Annual Report (page 265).

Through PowerCo, the Volkswagen Group aims to contribute to building a resilient, competitive and sustainable battery industry with strong roots in Europe and North America. Volkswagen Group and PowerCo have introduced the Unified Cell, which enables flexible use of a wide variety of cell chemistries and is intended to be used in up to 80% of the Group's all-electric models in the future. Material use within production is optimized by recycling production surpluses such as scrap and end-of-line materials close to the manufacturing process. In addition, the Volkswagen Group and PowerCo are also focusing on systematic end-of-life recycling and the use of recycled materials.

PowerCo secures the raw material supply through three mechanisms: long-term supply contracts, strategic investments with partners in its own mining operations and direct procurement from commodity markets.

Since its start, PowerCo has established IONWAY BV as a joint venture with the Belgian material technology group Umicore to produce cathodes and has also initiated activities to secure raw material supplies. During the reporting period, PowerCo worked closely with suppliers to prepare for the start of production while rigorously monitoring compliance with sustainability targets outlined in the purchasing agreements. In instances where raw materials originate from high-risk countries, PowerCo successfully encouraged suppliers to commence sustainability assessments (e.g. IRMA), underscoring the Volkswagen Group's commitment to responsible sourcing.

The Sustainable Supply Chain team of the Volkswagen Group supports PowerCo in assessing the social and environmental risks associated with potential direct suppliers of battery raw materials and in defining appropriate risk mitigation measures as part of long-term supplier engagement.

During the reporting period, desktop due diligence ESG pre-checks with a focus on mine sites were implemented as a standard part of initial supplier engagement for all battery raw materials. For high-risk contexts, comprehensive on-site due diligence was conducted during contract negotiations, facilitated by consultation by industry experts. These assessments address extensive human rights and environmental criteria in accordance with applicable legislation and international due diligence standards.

In 2025, significant progress was made in negotiations with interested parties, including the signing of memoranda of understanding. The joint efforts aim to continue expanding and strengthening PowerCo's global supplier network, underscoring the Volkswagen Group's commitment to responsible sourcing and supplier collaboration.

Outlook 2026

We plan to

— scale up and roll out new tools and standards to integrate the requirements of the EUBR

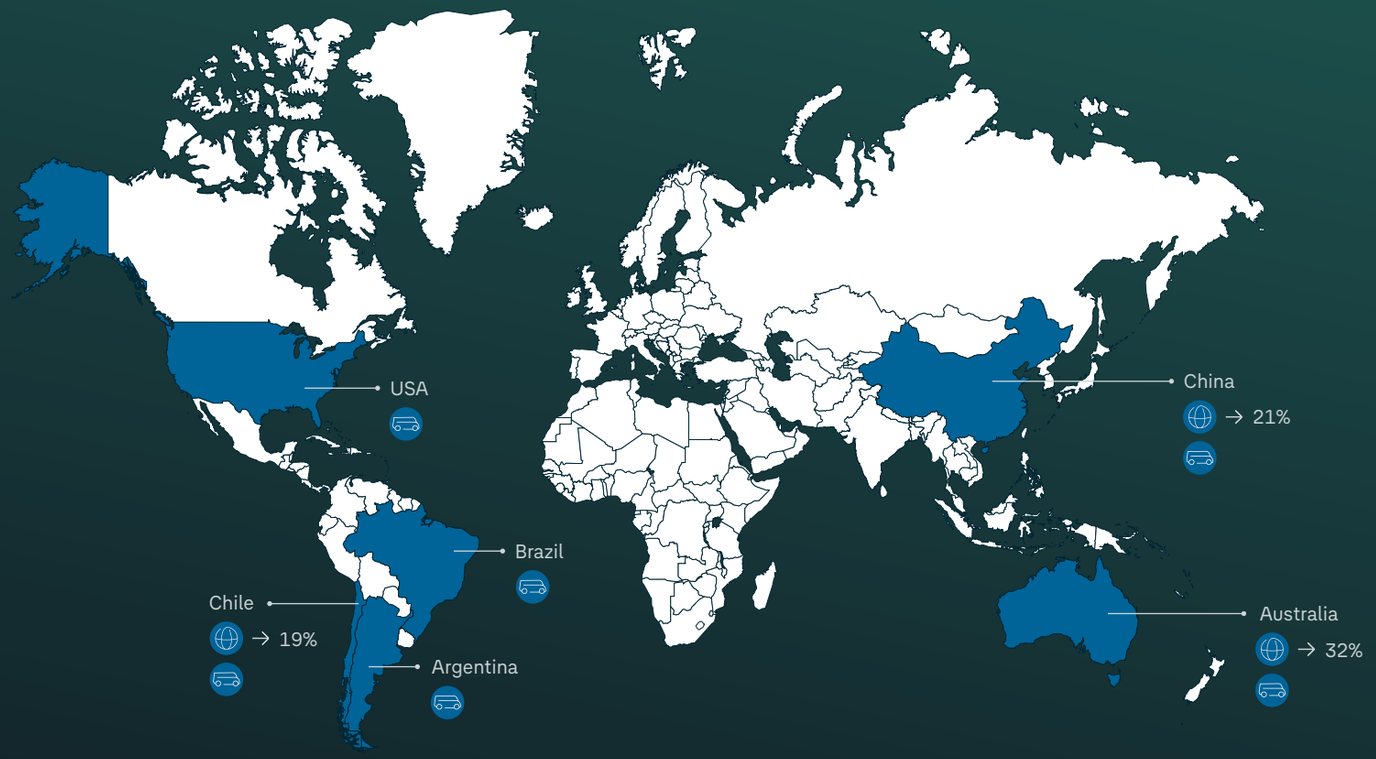
— continue our robust engagement and close dialogue with our direct battery suppliers and sub-suppliers

— focus on third-party audits and our Supplier Engagement Programs to ensure appropriate risk management activities

Lithium

Lithium supply chains rely on water-intensive brine extraction and hard-rock mining in fragile ecosystems, where intensive resource use, weak oversight and complex processing steps create systemic conditions that enable significant environmental and community-level risks.

Countries of origin



Mining countries Volkswagen Group Top 3 mining countries (global)

Source: USGS, 2025 estimates.

Key material-specific risks

Environment

— Water pollution and consumption

Human Rights

— Forced or compulsory labor

Community Life

— Protection of the rights of indigenous and local people
— Forced evictions or expropriations
— Causing harmful environmental change

Lithium is a soft and light, silvery-white alkali metal found in mineral and brine deposits. The metal is best known for its high energy storage density and its use in rechargeable batteries. Further industrial applications are metallurgy, glass and ceramics, lubricants, and drugs.

Lithium in our Supply Chain

Lithium hydroxide and lithium carbonate are the most significant lithium products. This is also true for the Volkswagen Group, as they are essential raw materials for battery cathodes and electrolytes. With the expansion of electromobility, demand for lithium is projected to further increase in the coming years.

In the reporting year, the Volkswagen Group mainly procured battery cells from suppliers several tiers away from the raw material origins. In 2025, the Volkswagen Group's battery manufacturer PowerCo started the sourcing of lithium, nickel and cobalt products for the cathode active material value chain (see → page 28).

Risk Assessment

To effectively understand and manage the systemic ESG risks tied to lithium, the Volkswagen Group works closely with cross-industry initiatives and other external stakeholders. We also monitor media reports and scientific publications related to the lithium industry. Additionally, we collect supply chain data through our battery suppliers and review the data, integrating the insights into our risk assessment process to identify key material-specific risks.

FOCUS PARTS

— EV batteries

HIGHLIGHT

Responsible Lithium Partnership successfully concluded

The Salar de Atacama salt flat in Chile is one of the major lithium producing regions of the world. The ecosystem in the region is fragile, and mining risks could affect ecosystems and local livelihoods, intensifying conflicts over the scarce water resources. Therefore in 2021, the Responsible Lithium Partnership project was launched to reduce the risks posed by lithium extraction. The Volkswagen Group was one of the founding members and worked alongside other global industry partners, coordinating closely with the German Agency for International Cooperation (GIZ), to promote the responsible use of resources in lithium production in the region.

A unique roundtable format, the **Mesa Multiactor**, was created, bringing together representatives from local tourism and agriculture associations, lithium-mining companies, indigenous communities, and local authorities to reach collaborative agreements on priority issues related to the sustainability of the region.

In the reporting year, the Volkswagen Group and its partners successfully concluded the Responsible Lithium Partnership, turning the roundtable into a permanent model of collaboration in the Salar de Atacama basin. Since February 2025, the roundtable has continued its work as an independent foundation with a continued focus on water management, serving as a vehicle to secure independent funding in the future. It will continue to serve as a safe and uniquely inclusive space for dialogue, in addition to implementing concrete improvement projects and amplifying local voices on issues of territorial governance, water management and lithium extraction.

Between 2021 and 2025, the stakeholders agreed on a joint action plan containing 30 measures, among them a cadastre to regulate the rights of water holders in the Salar, methods of recycling gray water, geological and hydrological mapping, public awareness campaigns on water scarcity, and improved provision of drinking water to local communities.

At a closing event in Berlin in February, the roundtable presented the lessons learned to representatives from financing companies, local civil society, the mining industry, public sector stakeholders and diplomatic officials, delivering valuable insights into corporate due diligence and the future of responsible resource management.

Australia, Chile, Brazil, China, Argentina and the US are among the main mining and extraction countries of lithium for the Volkswagen Group, while we have also seen a significant increase in lithium production in China, Mali and Zimbabwe. The systemic and salient risks linked to lithium production are primarily water-related and include various adverse environmental impacts on soil and biodiversity. Environmental risks are particularly high for water stress areas such as Chile. Additional risks are related to operations affecting indigenous peoples' and community rights. In the reporting year, the Volkswagen Group's Sustainability Supply Chain team continued to monitor developments and projects related to direct lithium extraction (DLE). DLE encompasses various technologies designed to selectively extract lithium ions directly from lithium-rich solutions, reducing brine consumption but increasing energy and freshwater consumption, depending on the specific technology applied. To date, the available data on the environmental impacts of DLE is limited to a few pilot projects, and the associated ESG risks have yet to be fully assessed.

Risk Mitigation

The Volkswagen Group adopts a multi-faceted approach to mitigating risks in its lithium supply chains. Our approach is centered on close collaboration with our key battery suppliers to ensure engagement at deeper levels of the supply chain. We have established sustainability requirements for all suppliers and closely coordinate these requirements across the Volkswagen Group for all battery raw materials. In addition, we actively engage with cross-industry initiatives and NGOs. For more information see → page 19.

We participate in multi-stakeholder initiatives and believe that collaborative approaches can help to achieve positive impacts in mining-affected regions by working locally with affected stakeholders and indigenous communities.

During the reporting period, we continued to promote harmonized standards and increase the volume of Initiative for Responsible Mining Assurance (IRMA)-certified material through our involvement with the IRMA. We also maintained an active collaboration with the Responsible Minerals Initiative (RMI), although the Working Group on Lithium was temporarily paused. Plans are underway to reactivate this group in 2026, with the Volkswagen Group committed to active participation. Throughout the reporting year, we also engaged with the International Lithium Association (iLiA) on industry trends and recent ESG-related developments in Zimbabwe and maintained a dialogue with the International Council of Swedish Industry (NIR) on initiatives advancing a more responsible and sustainable lithium supply chain in South America. Our broader stakeholder engagement also involved discussions with NGOs, academic institutions and government bodies on specific topics.

Stakeholder Engagement

- At least monthly meetings with battery suppliers, both virtual and in-person
- Dialogue on ESG topics with relevant companies in the n-tier lithium supply chain
- Direct conversations with Latin American stakeholders, NGOs and companies during the closing event of the Mesa Multiactor project
- Ongoing dialogue with NGOs and academic institutions
- RMI Working Group on Lithium to be revived in 2026

Outlook 2026

We plan to

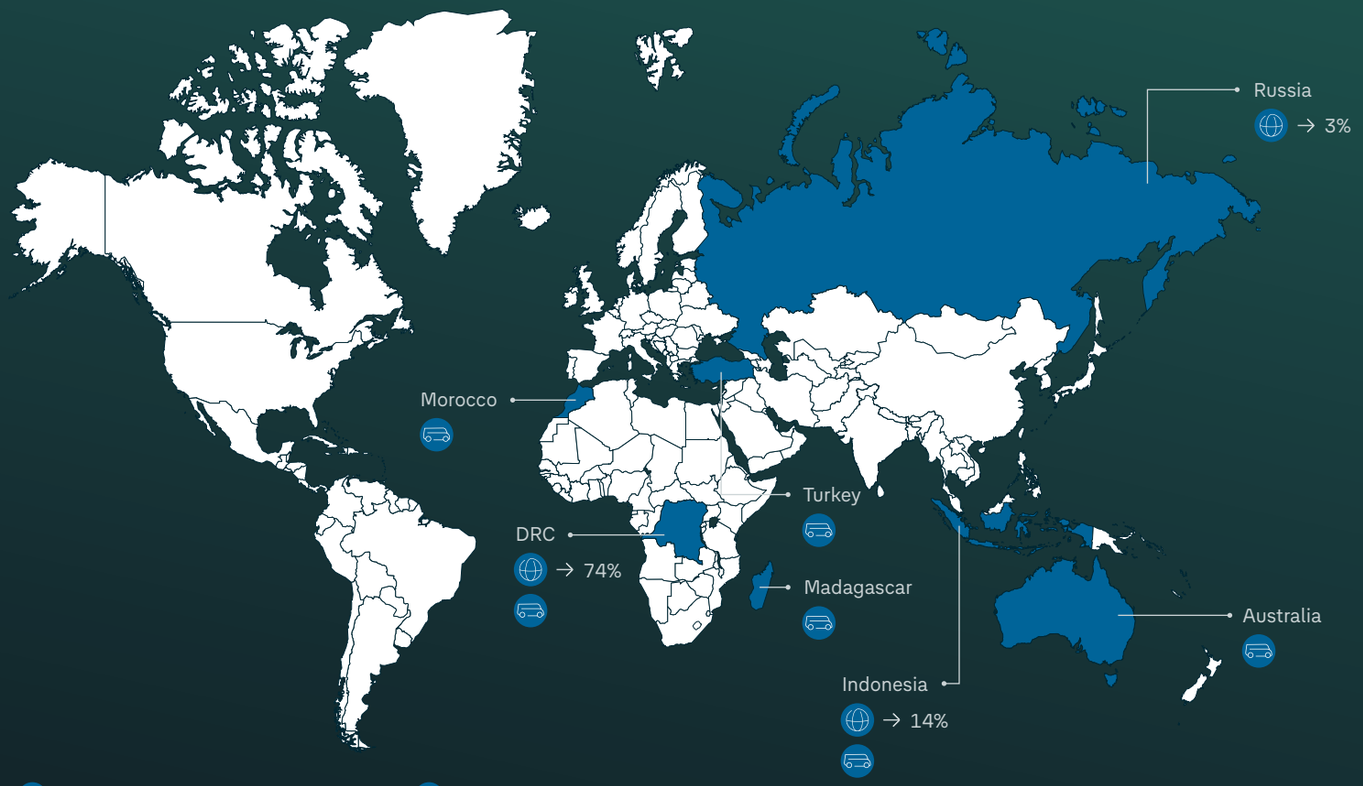
- continue to engage with local stakeholders, particularly in locations we have not focused on in the past
- intensify dialogue with external stakeholders on environmental and social risks related to new extraction technologies such as DLE
- further roll out tools and standards to integrate the requirements of the EU Battery Regulation (EUBR)

For more information on the EU Battery Regulation see → page 26 of this report.

Cobalt

Cobalt supply chains are characterized by deep upstream complexity, including intensive mining, hazardous processing steps and widespread informality. Weak oversight, livelihood dependence on mining and limited traceability create systemic conditions for severe social and environmental risks.

Countries of origin



Mining countries Volkswagen Group Top 3 mining countries (global)

Source: USGS, 2025 estimates.

Key material-specific risks

Environment

- Hazardous substances
- Water pollution including marine environment
- Handling and disposal of waste
- Soil pollution and land degradation
- Loss of biodiversity

Human Rights

- Child labor
- Forced or compulsory labor
- Any form of discrimination
- Support of armed groups and public or private security forces
- Health and safety
- Trade union freedoms
- Payment of appropriate wages

Community Life

- Forced evictions or expropriations
- Protection of the rights of local people
- Causing harmful environmental change

Cobalt is a hard, lustrous, silvery metal found in rocks only in a chemically combined form. The vast majority of cobalt is extracted as a by-product of existing nickel and copper mining. Cobalt is primarily used in lithium-ion batteries and in the manufacture of high-strength magnetic alloys.

Cobalt in our Supply Chain

Cobalt hydroxide, cobalt sulphate and cobalt metal are the main inputs for EV battery cell production. Cobalt is critical to battery performance, enhancing vehicle range and safety by providing essential thermal stability in cathode materials.

In the reporting year, the Volkswagen Group mainly procured battery cells from suppliers several tiers away from the raw material origins. In 2025, the Volkswagen Group's battery manufacturer PowerCo started the sourcing of lithium, nickel and cobalt products for the cathode active material value chain (see → page 28).

FOCUS PARTS

— EV batteries

Risk Assessment

The main countries of origin for cobalt in the Volkswagen Group's supply chains are the DR Congo (DRC), Turkey, Indonesia and Australia. The most significant risks linked to cobalt sourcing are human rights abuses and adverse environmental impacts, largely due to the concentration of cobalt mining in the southern DRC. Here, artisanal and small-scale mining (ASM) predominates and is characterized by low wages, poor working conditions and inadequate safety measures. Weak law enforcement exacerbates environmental damage, which affects neighboring communities. Additionally, supply chain traceability remains limited and challenging due to the numerous actors involved.

Risk Mitigation

The Volkswagen Group adopts a multi-faceted approach to mitigating risks in its cobalt supply chains. The approach is centered on close collaboration with our key battery suppliers to ensure engagement at deeper levels of the supply chain. We have established sustainability requirements for all suppliers and closely coordinate these requirements across the Volkswagen Group for all battery raw materials. For more information see → page 27.

The Volkswagen Group strictly excludes artisanal mining operations from its cobalt sourcing. In line with the OECD Minerals Guidance, we do not categorically prohibit sourcing from conflict-affected and high-risk areas (CAHRAs) but prioritize promoting responsible sources within these regions. We actively monitor evidence to identify suppliers in areas that are prone to human rights abuses.

Stakeholder Engagement

- Regular meetings with battery suppliers
- Participation in RMI Working Group on Cobalt
- Ongoing exchange with NGOs, media and other stakeholders regarding affected local communities

Outlook 2026

We plan to

- work to further increase transparency along the cobalt supply chain
- continue to promote the IRMA standard for responsible cobalt mining
- increase participation in the RMI Working Group on Cobalt for outreach activities
- further roll out tools and standards to integrate the requirements of the EUBR

For more information on the EU Battery Regulation see → page 26 of this report.

HIGHLIGHT

Cobalt for Development (C4D)

Since 2020, the Volkswagen Group has participated in the cross-industry Cobalt for Development (C4D) initiative implemented by the German Agency for International Cooperation (GIZ), collaborating with partners from industry and civil society to enhance conditions in the ASM sector for cobalt in the Democratic Republic of the Congo. With a market-based approach, C4D aims to enable responsible and profitable ASM operations, thereby improving traceability; countering informal trade; and mitigating risks such as child labor, unsafe working conditions and income insecurity.

Within five years, C4D achieved tangible results, including the development of training modules, the strengthening of local cooperatives, advocacy for legal frameworks and the facilitation of multi-stakeholder dialogue, establishing an operational model for ASM sites. Community impacts included improved living conditions for approximately 3,000 people through education (e.g., a new school for 600 children), vocational training, agricultural programs and business development, with insights captured in a Lessons Learned Paper offering recommendations for responsible sourcing. At the same time, it became clear that structural change in the ASM sector depends primarily on political frameworks and state governance. Despite intensive efforts and visible progress, the impact of private sector initiatives remains tied to state action.

Against this backdrop, following thorough evaluation, the Volkswagen Group has decided to withdraw from C4D. We recognize the need to focus resources where they can have the most certain impact on responsible raw material supply chains. We appreciate the progress achieved through C4D and the trusting collaboration with partners on the ground, and we remain committed to ASM transformation in the DRC via ongoing support where needed, particularly for market connectivity.

Tailings management is a key risk at cobalt mining sites and must be properly addressed to comply with international best practices. The cobalt supply chain presents additional challenges compared to lithium, as cobalt is often mined as a by-product of large-scale copper (mainly in the DR Congo) or nickel mines (e.g., Indonesia).

We continuously seek contractual commitments from supply chain partners to international standards like IRMA and the RMI. We also actively engage to further develop global standardization processes (such as the RMI and the Cobalt Institute).

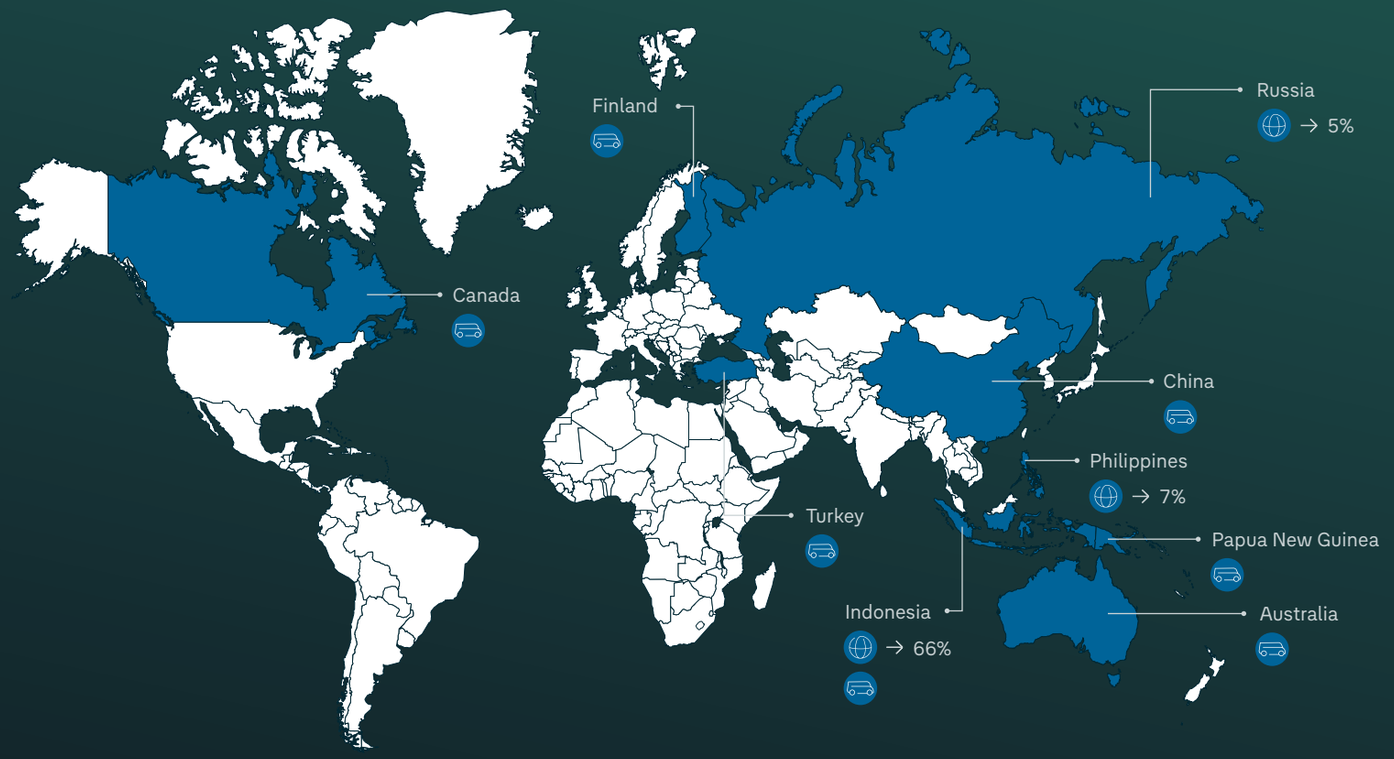
During the reporting year, the Volkswagen Group resumed participation in the RMI Working Groups on cobalt and copper to address human rights risks and environmental challenges and to share best practices. We also delivered an online presentation at a multi-stakeholder cobalt workshop in the DRC to communicate our due diligence expectations to supply chain partners ahead of the EUBR and continued to engage in discussions with NGOs, media and other stakeholders to better understand local communities and emerging risks.

While one major copper–cobalt mining company is already undergoing an IRMA assessment, other operators still prefer alternative certification schemes. To address these gaps, the Volkswagen Group will continue its targeted outreach with the aim of increasing participation in IRMA assessments. In addition, the Volkswagen Group has launched Supplier Engagement Programs for both mining and mid-stream levels, supported by external providers (for more information see → page 12).

Nickel

Nickel supply chains are shaped by large-scale laterite mining and energy-intensive High-Pressure Acid Leaching (HPAL) processing in regions such as Indonesia and the Pacific, where weak oversight, high resource use and complex industrial clusters create systemic environmental and social risks.

Countries of origin



Mining countries Volkswagen Group Top 3 mining countries (global)

Source: USGS, 2025 estimates.

Key material-specific risks

Environment

- Hazardous substances
- Air pollution
- Water including marine environment
- Handling and disposal of waste
- Soil pollution and land degradation
- Loss of biodiversity

Human Rights

- Child labor
- Forced or compulsory labor
- Health and safety
- Trade union freedoms
- Plant safety

Community Life

- Forced evictions or expropriations
- Protection of the rights of indigenous and local people

Nickel is a silvery metallic element which occurs naturally in soil and water. Its most important applications are lithium-ion batteries and stainless steel, as well as other alloys and plating.

Nickel in our Supply Chain

Nickel is a strategically important raw material in the electrification of vehicles, in addition to its other uses in stainless steel, alloys and plating. Nickel sulfate provides a source of nickel ions for the cathode material of high-voltage lithium-ion batteries, such as nickel–manganese–cobalt (NMC) batteries, contributing to the overall performance, energy density and stability of the batteries.

The nickel value chain for EV batteries primarily processes laterite ore through mining, followed by ore preparation via crushing and grinding. This leads to high-pressure acid leaching (HPAL) for extraction, production of intermediates like mixed hydroxide precipitate (MHP) or mixed sulfate precipitate (MSP), refining to class 1 battery-grade nickel, and conversion to nickel sulfate. The chain concludes with cathode precursor manufacturing (incorporating nickel sulfate into NMC/nickel–cobalt–aluminum precursors) and final integration into battery cell manufacturing.

FOCUS PARTS

— EV batteries
— Exhaust systems

For the Volkswagen Group, EV batteries are prioritized as focus parts in nickel supply chains. In the reporting year, the Volkswagen Group mainly procured battery cells from suppliers several tiers away from the raw material origins. In 2025, the Volkswagen Group's battery manufacturer PowerCo started the sourcing of lithium, nickel and cobalt products for the cathode active material value chain (see → page 28).

Risk Assessment

The main countries of origin for nickel for the Volkswagen Group are Australia, Canada, China, the Democratic Republic of the Congo, Finland, Indonesia, Madagascar, New Caledonia, Papua New Guinea, Russia, South Africa and Turkey. The extraction and production of nickel present systemic and salient risks, notably environmental impacts stemming from open-pit mining such as forest and soil degradation, water pollution, and the management of toxic tailings from processing facilities. Nickel production is also characterized by significant greenhouse gas emissions and high energy consumption. Adverse environmental effects also have a direct impact on local communities. Human rights issues, including working conditions and occupational health and safety, constitute another salient risk area.

To assess the systemic and salient risks associated with nickel, the Volkswagen Group continuously collects supply chain data through our battery suppliers and collaborates with cross-industry initiatives and non-governmental organizations. Sourcing nickel from Indonesia poses particular challenges due to the presence of large-scale mines alongside smelting and refining operations within industrial complexes. The cumulative impacts and interconnected activities in these areas complicate the task of assigning responsibility for worker protection and environmental management.

Stakeholder Engagement

— Founding member of Nickel Impact Programme Indonesia (NIPI)
— Engagement in industry initiatives and working groups
— Ongoing dialogue with industry peers and direct and indirect suppliers
— Continous collaboration with NGOs and stakeholders, e.g. in Indonesia

Risk Mitigation

The Volkswagen Group adopts a multi-faceted approach to mitigating risks in its nickel supply chains. Our approach is centered on close collaboration with our key battery suppliers to ensure engagement at deeper levels of the supply chain. We have established sustainability requirements for all suppliers and closely coordinate these requirements across the Volkswagen Group for all battery raw materials. In addition, we actively engage with cross-industry initiatives and NGOs. For more information see → page 27.

As with other metals, we seek to contractually commit our nickel suppliers to international standards such as the Initiative for Responsible Mining Assurance (IRMA) standard. However, the nickel supply chain presents additional challenges compared to lithium, as many nickel mining companies are relatively new to the IRMA standard and sometimes prefer alternative standards. The Volkswagen Group actively participates in the Responsible Minerals Initiative (RMI) Working Group on Nickel, which convened during the reporting period to address human rights risks and environmental challenges and to share best practices for engagement. We also continued to engage in discussions with our key suppliers, NGOs, media and other stakeholders to target key issues such as biodiversity degradation and human rights risks.

During the reporting year, the Volkswagen Group worked as a founding member to start the **"Nickel Impact Programme Indonesia"** (NIPI) together with industry partners and the German Agency for International Cooperation (GIZ). The initiative focuses on addressing and reducing risks of nickel production in Weda Bay on the island of Halmahera in eastern Indonesia.

The project works with local residents, civil society and the operators of the industrial park to identify and address social and environmental impacts such as health issues in local communities, air and water pollution, and loss of aquatic biodiversity in the surrounding environment. Under the NIPI, the GIZ is set to organize a community forum with participation from community representatives, national and regional authorities, and civil society organizations. The forum will jointly identify pressing issues in the affected communities and prepare proposals and action plans to address the negative consequences of nickel mining and processing. The aim is to strengthen community health services and improve access to safe drinking water through capacity building and equipment support. After scoping and preparation activities to select and set up the projects, the implementation started in September 2025.

Outlook 2026

We plan to

— engage in the NIPI program, including a field trip to Indonesia

— continue promoting the IRMA within the nickel supply chain

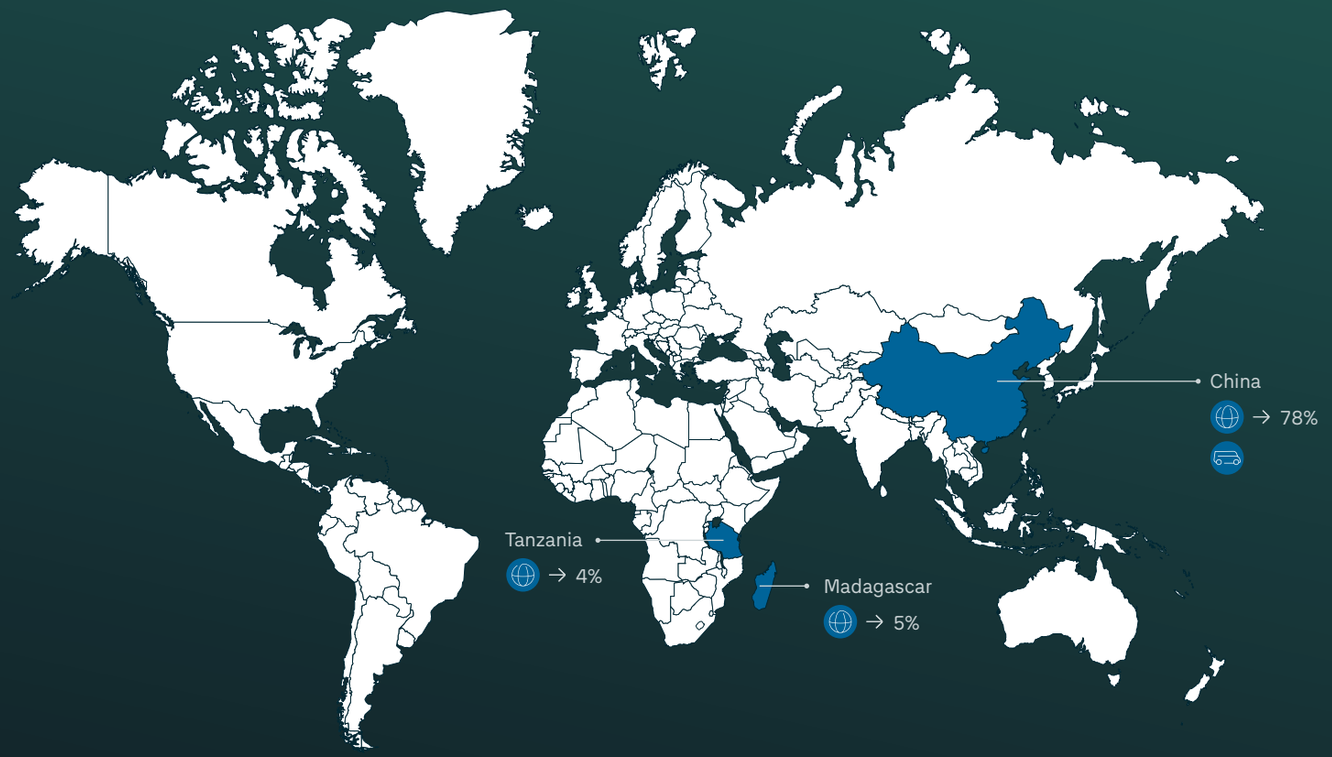
— further roll out tools and standards to integrate the requirements of the EU Battery Regulation (EUBR)

For more information on the EU Battery Regulation see → page 26 of this report.

→ Natural Graphite

Natural graphite supply chains are shaped by fragmented mining and energy-intensive processing using hazardous chemicals. Weak enforcement, low transparency and compley mid-stream operations create systemic conditions for human rights and environmental risks.

Countries of origin



Mining country Volkswagen Group Top 3 mining countries (global)

Source: USGS, 2025 estimates.

Key material-specific risks

Environment

— Production and use of pollutants
— Air pollution

— Water pollution and consumption

Human Rights

— Health and safety
— Plant safety

Community Life

— Causing harmful environmental change

Graphite is a soft, crystalline form of carbon with a metallic luster and a dark gray color. With its thermal and electrical conductivity, it is suitable for diverse industrial applications. Graphite has two forms: natural graphite (mined), and synthetic graphite (produced from petroleum coke or coal tar), both widely used in pencils, lubricants and electrodes.

Natural Graphite in our Supply Chain

Graphite, in both natural and synthetic forms, is used in numerous vehicle components, most importantly in EV battery anodes, but also in brake discs and precision parts as well as in graphite powders. For the Volkswagen Group, EV batteries represent the primary application for both natural and synthetic graphite.

FOCUS PARTS

— EV batteries

Risk Assessment

The production of synthetic graphite requires an energy-intensive industrial process with a larger carbon footprint, while the mining and processing of natural graphite pose social and environmental risks in the extraction regions. The Volkswagen Group has identified natural graphite as one of its priority materials, so our risk assessment is primarily focused on further analyzing the natural graphite supply chain.

The most systemic and salient risks identified include human rights issues and adverse environmental impacts, notably occupational health and safety, plant safety, air and water pollution, and the management of pollutants and hazardous chemicals. China is by far the world's leading supplier of natural graphite, followed by Madagascar and Mozambique. Achieving transparency remains a challenge, given the fragmented nature of the mining sector and heavy dependence on China. Additionally, weak law enforcement in mining regions amplifies human rights and environmental risks.

In 2025, the Volkswagen Group concluded a project with external experts on the Chinese natural graphite sector to complement our existing insights in terms of actual salient risks in natural graphite in China that we need to address. The results of the project validated our risk analysis; however, supply chain transparency and direct contact with n-tier suppliers in China remain challenging.

Stakeholder Engagement

- China stakeholder interviews to understand complex natural graphite supply chains
- Regular meetings with battery suppliers
- Mid-stream Supplier Engagement Programs
- Close collaboration with initiatives, RMI Working Group on Graphite to be revived in 2026

Risk Mitigation

The Volkswagen Group adopts a multi-faceted approach to mitigating the risks associated with the complex natural graphite supply chain. This approach is centered on close collaboration with our key battery suppliers to ensure engagement at deeper levels of the supply chain. We have established sustainability requirements for all suppliers and closely coordinate these requirements across the Volkswagen Group for all battery raw materials. For more information see → page 27.

As with other metals, we seek to contractually commit our graphite suppliers to the Initiative for Responsible Mining Assurance (IRMA) standard. To date, at both the mining and refining level, there is a lack of sustainability standards for graphite. To bridge these gaps, the Volkswagen Group has launched Supplier Engagement Programs for both the mining and the mid-stream levels, supported by external providers (for more information see → page 12). During the reporting year, a second-party visit and audit was conducted at a Chinese graphite mine, and direct communication with the Volkswagen Group was initiated.

During the reporting period, we also maintained active collaboration with the Responsible Minerals Initiative (RMI), although the Working Group on Graphite was temporarily paused in the second half of 2025. Plans are underway to reactivate this group in 2026, with the Volkswagen Group committed to active participation. Our broader stakeholder engagement also involved discussions with NGOs, media and other stakeholders to improve our understanding of affected local communities and emerging risks.

Outlook 2026

We plan to

— intensify our graphite supply chain mapping and audit program with our battery suppliers

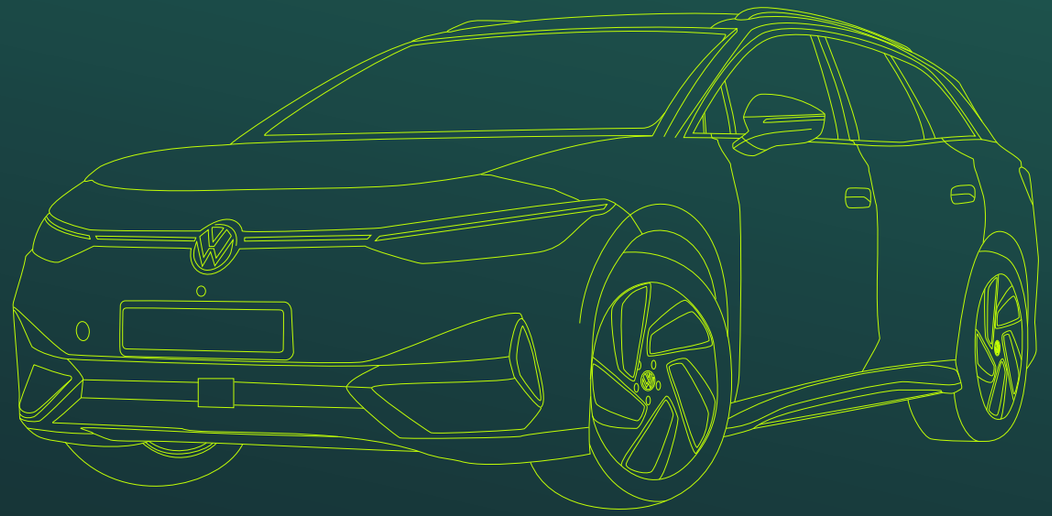
— continue Supplier Engagement Programs to raise awareness among sub-suppliers and promote joint standards

— further roll out tools and standards to integrate the requirements of the EU Battery Regulation (EUBR)

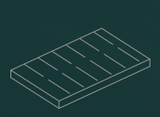
For more information on the EU Battery Regulation → see page 26 of this report.

Other Metals and Minerals

Minerals and metals include several key materials used in vehicles—from automotive structures, electronics, catalysts, to other components.

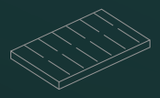


Battery Raw Materials



Lithium
Page 29

Cobalt
Page 32



Nickel
Page 35

Natural Graphite
Page 38

Other Metals and Minerals

Aluminium
Page 42

Copper
Page 45

Magnesium
Page 47

Mica
Page 49

PGM
Page 53

REE
Page 56

Steel
Page 59

3TG
Page 61

Biogenic Raw Materials

Cotton
Page 65

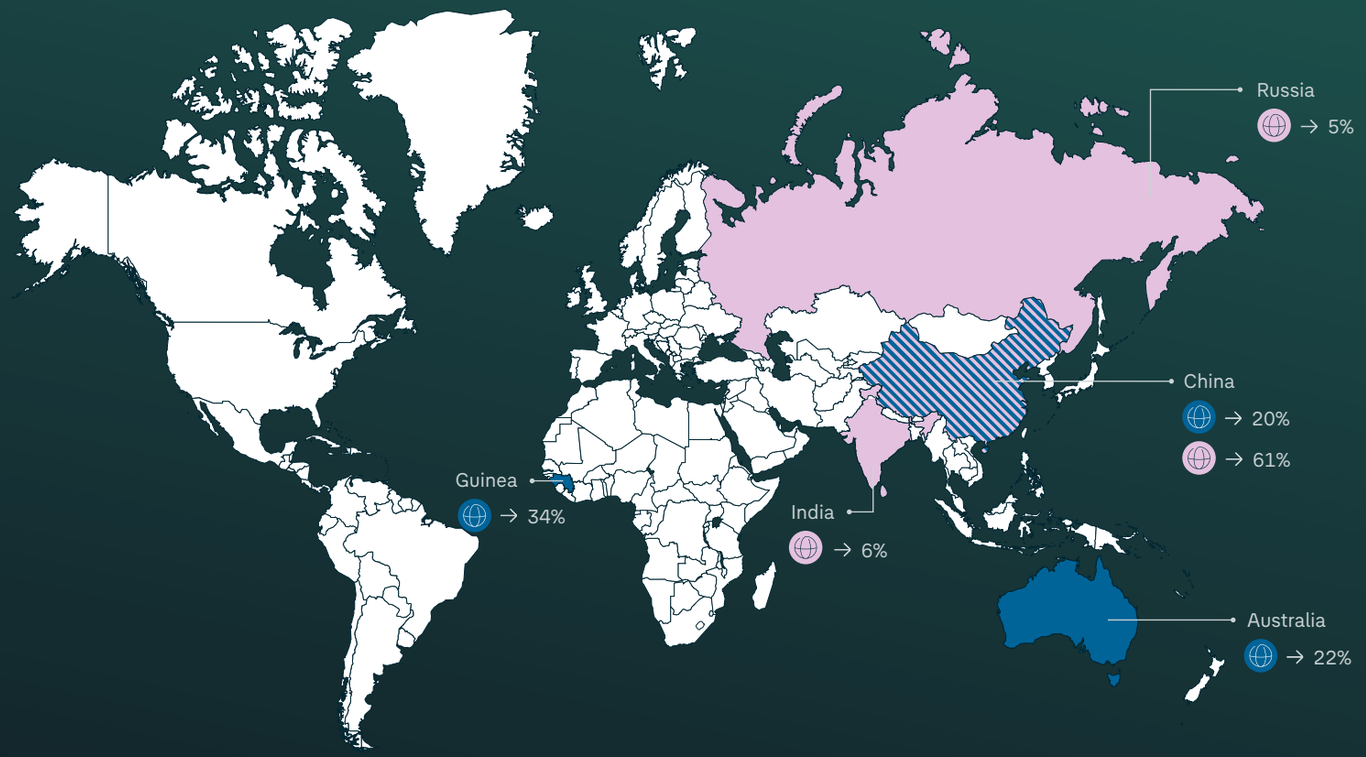
Leather
Page 68

Natural Rubber
Page 71

Aluminum

Aluminum extraction and refining rely on open-pit bauxite mining and highly energy-intensive processing near mining regions. These conditions, combined with weak oversight in some countrie, drive systemic environmental impacts and community-level risks in producing areas.

Countries of origin



Top 3 bauxite mining countries (global)
Top 3 smelting and refining/processing countries (global)

Source: USGS, 2025 estimates.

Key material-specific risks

Environment

- Air pollution
- Water pollution and consumption
- Handling and disposal of waste
- Soil pollution and land degradation
- Loss of biodiversity

Human Rights

- Forced or compulsory labor

Community Life

- Forced evictions or expropriations
- Protection of the rights of indigenous people
- Causing harmful environmental change

Aluminum is extremely versatile and is therefore used in a variety of applications, often replacing steel due to its light weight. It is strong and nonmagnetic and conducts heat and electricity. Aluminum is an abundant element in the earth's crust but does not occur in its pure form. It has to be extracted from bauxite in a resource-intensive process.

Aluminum in our Supply Chain

Aluminum ranks as the second-most common material in vehicles after steel, comprising 5% to 25% of a vehicle's body weight, depending on the type and model. Applications include engine blocks, chassis, frames, body sheets and wheels, and electric vehicle (EV) components such as battery housings. Aluminum is a preferred material because of its superior strength-to-weight ratio and strong crash resistance. Replacing steel with aluminum reduces the overall vehicle weight, thereby enhancing fuel performance or battery range, respectively. Ongoing lightweighting and vehicle electrification efforts will increase aluminum demand.

Bauxite, the key ore, comes primarily from Guinea, Australia, China and Brazil. The Volkswagen Group sources aluminum mostly indirectly. Early supply chain stages are often handled by vertically integrated, global companies. Some components then undergo several additional processing steps before arriving at our direct suppliers.

FOCUS PARTS

— Wheel rims
— Body sheets
— Battery cases
— Die casting and extrusion parts

Diverse intermediate tiers and aluminum's varied vehicle applications create major hurdles for transparency and risk mitigation at lower levels of the supply chain.

Risk Assessment

Our annual risk assessment has identified three systemic and salient risk areas at deeper supply chain levels: adverse environmental impacts, adverse impacts on local and indigenous communities, and the risk of forced or compulsory labor in smelting in specific regions.

Bauxite mining causes significant soil and water degradation from open-pit mining and sediment flows. Bauxite refining generates a large amount of residue known as red mud and dust, a highly caustic material that can pose environmental risks such as air and water pollution. Refining and smelting are also highly energy-intensive and generate significant greenhouse gas emissions. Additionally, in regions where governments do not effectively regulate technical standards or require environmental impact assessments, mining companies may fail to adequately monitor, mitigate or address operational risks.

The environmental impacts correlate with risks to indigenous communities and other affected communities such as forced evictions, reduced water availability and poorly managed resettlements without adequate relocation compensation. These factors can result in serious long-term impacts on the affected communities, including the loss of livelihoods and reduced quality of life.

In 2025, we continued our dialogue with external stakeholders, including several NGOs, to better understand the spatial dimension and impacts of the risks that arise. On behalf of the Volkswagen Group, Audi participated in a roundtable focusing on metallic raw materials as part of the National Action Plan (NAP) for Business and Human Rights. The event brought together companies and actors from civil society to share best practices and identify possible actions for a path to fair and sustainable procurement.

Stakeholder Engagement

— Continued exchange with NGOs on human rights and environmental risks, particularly in high-risk regions and mining countries
— Ongoing dialogue with tier 1 and tier 2 suppliers to deepen understanding of technical and sustainability requirements and to discuss environmental targets
— ASI membership and active involvement to develop and drive harmonized standards in the aluminum supply chain
— Engagement with mining industry actors

Risk Mitigation

To mitigate environmental, community and human rights risks within a complex supply chain, we aim to increase the use of aluminum certified to **recognized standards** such as those established by the **Aluminium Stewardship Initiative (ASI)**. The ASI Performance and Chain of Custody standards set requirements for the responsible production, sourcing and stewardship across the entire aluminum value chain. On the heels of the ASI's 10-year anniversary in 2025, we have seen growing participation amongst companies as well as a steady increase in the volume of certified material. However, adoption remains slow, with many of our suppliers still uncertified.

Audi leads the Volkswagen Group's engagement with the ASI, and Porsche joined during the reporting year. The Audi team actively participated in the ASI's Standards Committee and a Chain of Custody revision working group, providing the downstream perspective of an automotive OEM.

In 2025, Audi obtained recertification to the ASI Performance Standard, while Porsche completed its first certification in November. The Volkswagen Group is continuing to encourage more brands to become ASI-certified and to increase market demand for ASI-certified material. The Volkswagen Group is also a member of the Initiative for Responsible Mining Assurance (IRMA), providing independent mine assessments according to comprehensive standards.

We employ a standardized **aluminum specification sheet** requiring the supply of ASI Chain of Custody-certified material from our body sheet part suppliers. Audi is currently assessing the expansion to additional material groups, such as alloy wheels and battery housings.

In the reporting year, Audi conducted several environmental training sessions for procurement staff and representatives of tier 1 suppliers, with around 600 participants. Together with Volkswagen, additional in-depth workshops were held with selected suppliers to discuss our decarbonization and circular economy requirements and the availability of recycled material for selected material groups, including aluminum.

Audi is currently evaluating a collaborative on-the-ground project in Guinea with other automotive OEMs to mitigate environmental impacts and human rights challenges of bauxite mining.

Decarbonization & Recycled Material

As one of the materials with the greatest immediate impact on decarbonization of the supply chain, aluminum is one of the Volkswagen Group's focus materials. The goal is to increase the share of recycled materials as well as the share of low-carbon aluminum in our supply chain. The Aluminum Closed Loop project was started at Audi in 2017 and was subsequently rolled out across other press shops of the Volkswagen Group. To date, a total of more than 1 million metric tons of CO_2 has been saved. Porsche has partnered with the Norwegian aluminum supplier Hydro for the use of low-carbon primary aluminum as well as secondary aluminum with a high proportion of recycled material in its vehicles.

Although both projects extend beyond the scope of the RMDDMS, the initiatives have a positive impact on the aluminum supply chain as the use of recycled aluminum can assist in decreasing the environmental and social pressures of primary aluminum production. More information is available in our 2025 Annual Report (page 320).

Outlook 2026

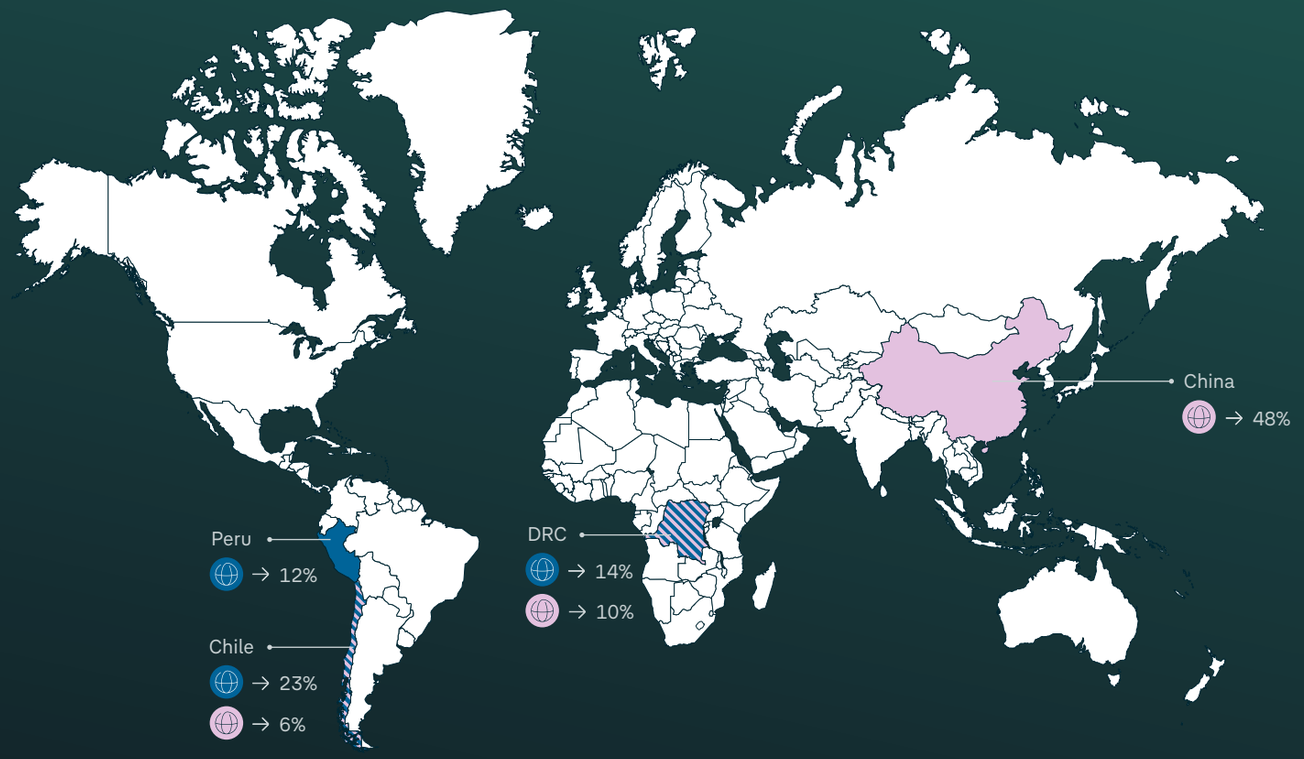
We plan to

— further promote the ASI approach within the Volkswagen Group
— actively engage in ASI working groups to revise standards
— evaluate options to expand sustainability requirements to additional material groups
— continue evaluation of collaborative on-the-ground measures in Guinea

Copper

Copper is predominantly extracted through large open-pit operations in biodiverse regions, where intensive land use, water-heavy leaching processes and hazardous chemicals, combined with local dependency on mining, create systemic environmental, social and community-level risks.

Countries of origin



Top 3 mining countries (global) Top 3 refining countries (global)

Source: USGS, 2025 estimates.

Key material-specific risks

Environment

- Air pollution
- Hazardous substances
- Water pollution and consumption
- Handling and disposal of waste
- Soil pollution and land degradation
- Loss of biodiversity

Human Rights

- Child labor
- Forced or compulsory labor
- Health and safety

Community Life

- Forced evictions or expropriations
- Protection of rights of indigenous and local people

Given its high thermal and electrical conductivity, copper is an indispensable mineral that plays a critical role in the electrical grid as well as in electricity generation and consumption. Copper is highly abundant but only found under certain geological conditions in sulfide and oxide ores. Global demand for copper is rising due to digitalization and the transition to renewable energy.

Copper in our Supply Chain

Copper's high thermal and electrical conductivity makes it an indispensable metal for the automotive industry, where it is used in a wide variety of parts and components. Copper production is more geographically diversified than many other critical metals, with Latin America and China accounting for a large share of the global supply. The Volkswagen Group did not directly source any copper in 2025. Supply chain research indicates that most of the copper contained in our wiring harnesses originates from Latin America and Indonesia. Looking ahead, we anticipate further increases in automotive demand for copper due to vehicle electrification and digitalization.

Risk Assessment

Copper extraction and processing pose several environmental risks to local ecosystems and communities. Open-pit mining requires extensive land use, causing deforestation, loss of wildlife habitat and biodiversity, and adverse impacts on neighboring and indigenous communities. Copper extraction is typically water-intensive and involves leaching with sulfuric acid, which can generate acid drainage, particularly affecting communities in areas of high water stress. Copper processing is also energy- and chemical-intensive.

Copper mining has sparked conflicts in areas of high water stress, with past protests by local communities leading to unrest, production halts, and the involvement of public and private security forces. Consequently, several risk categories identified as relevant for copper were rated high-risk. As copper demand continues to increase, new supply chain risks are emerging, for example tensions between formal mining (mostly large-scale) and informal, artisanal and small-scale mining (ASM) in Peru.

FOCUS PARTS

— Wiring harnesses
— EV engines
— Starters, generators

Risk Mitigation

Despite limitations on full transparency as a result of the inherent complexity of copper supply chains and the wide use of copper by a range of actors, the Volkswagen Group is committed to socially and environmentally responsible copper mining and processing. We actively participate in cross-industry initiatives and collaborate closely with top suppliers of our focus parts.

We consider stringent standards to be a key instrument for establishing sustainable processes across copper value chains. Accordingly, we engage with The Copper Mark, an assurance framework aiming to bring responsibly sourced copper to the market. At the end of 2025, certified sites accounted for around 40% of global copper mine output. On behalf of the Volkswagen Group, Audi and MAN are partners of The Copper Mark, with Audi represented on the advisory council. We regularly participate in meetings and provide a downstream perspective on the assurance process and the chain-of-custody standard.

Audi is also continuing to work on creating a specification sheet with sustainability requirements for copper in focus parts such as wiring harnesses. At the same time, a chain-of-custody pilot project is being prepared together with The Copper Mark.

Stakeholder Engagement

— Continued active involvement with The Copper Mark
— Targeted engagement with direct suppliers of wiring harnesses

Outlook 2026

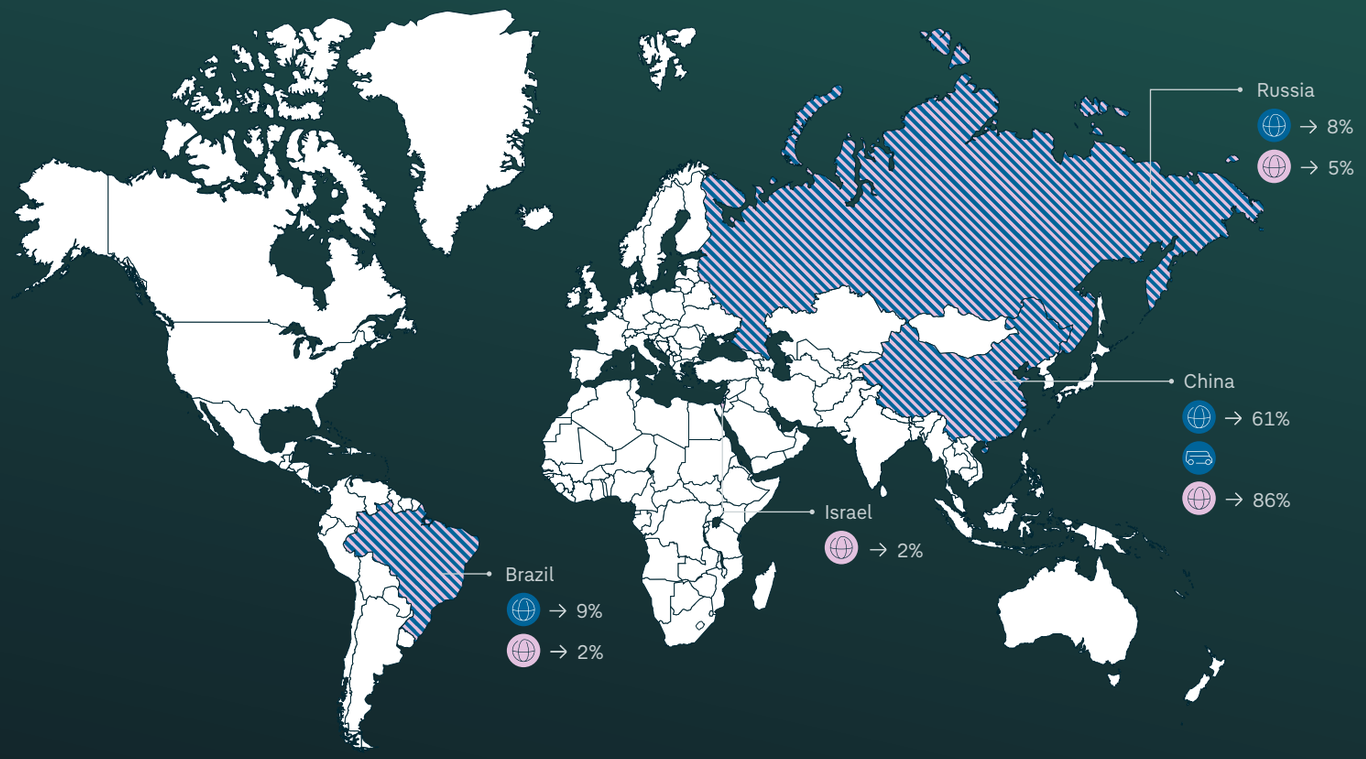
We plan to

— advance supplier dialogues to enhance upstream copper supply chain transparency
— sustain engagement with cross-industry initiatives for responsible sourcing
— develop a sustainability specification sheet for copper
— launch a chain-of-custody pilot project with The Copper Mark

Magnesium

Magnesium supply chains are highly fragmented and dominated by energy-intensive production in regions with weak regulatory enforcement. These conditions, combined with severe air, water and soil impacts, create systemic environmental and social risks in upstream magnesium sourcing.

Countries of origin



Mining country Volkswagen Group · Top 3 mining countries (global) · Top 3 smelting countries (global)

Source: USGS, 2025 estimates.

Key material-specific risks

Environment

- Air pollution
- Water pollution and consumption
- Soil pollution and land degradation

Human Rights

- Forced or compulsory labor
- Any form of discrimination
- Health and safety
- Trade union freedoms
- Payment of appropriate wages

Community Life

- Protection of the rights of indigenous people

Magnesium is an alkaline earth metal with high chemical reactivity, a low melting point and low density. The shiny gray metal is used in many applications where reduced weight is important. It is used primarily as a component in strong and lightweight alloys that contain aluminum and is highly abundant within the earth's crust. However, it must be processed to be available in its pure form. This is done through various highly energy-intensive methods, including electrolysis and thermal reduction.

Magnesium in our Supply Chain

Magnesium is the third-most commonly used structural metal after steel and aluminum. In vehicles, it is typically employed in alloyed form, mostly as magnesium die-cast alloys and aluminum alloys. The material is primarily used in lightweight structural and interior components. Although magnesium is geologically abundant and global reserves are effectively inexhaustible, primary production is heavily concentrated in Yulin, China. The Volkswagen Group sources magnesium indirectly through aluminum alloys and various vehicle components.

Risk Assessment

With the ongoing trend toward lightweighting, magnesium has become a critical raw material for the Volkswagen Group, necessitating systematic assessment and risk management in the upstream supply chain. Since adding magnesium to our list of priority raw materials in 2023, efforts have focused on deepening our understanding of the highly fragmented supply chains and conducting an initial in-depth analysis to identify the most systemic and salient risk areas.

This work combined comprehensive research with targeted dialogues involving key suppliers of magnesium and aluminum components as well as engagement with Drive Sustainability. At the same time, a research project was carried out in cooperation with external experts, covering magnesium, graphite and rare earth elements (REEs). The aim was to gain detailed market intelligence on sector dynamics and to better understand risk exposure, particularly in the Chinese context. Concluded in 2025, the project reaffirmed the findings from our own risk assessment. During the reporting year, we also conducted several workshops and engaged with stakeholder groups to improve understanding of regional material flows and associated risk profiles.

The Volkswagen Group has identified adverse environmental impacts, including air pollution and severe water and soil pollution, as key areas of high concern. With magnesium production largely concentrated in China, labor-related risks add to the situation, with potential human and labor rights violations where enforcement remains weak. Achieving transparency and mitigating risks at deeper levels of the supply chain remain significant challenges.

FOCUS PARTS

— Gearbox housing
— Steering wheels
— Display frames

Risk Mitigation

For complex supply chains, the Volkswagen Group underpins risk mitigation by applying common sustainability standards through cross-industry initiatives where available. As a member of the International Magnesium Association (IMA), we leverage industry collaboration. However, current common standards for magnesium revolve around performance criteria and quality management; a comprehensive sustainability standard for this material does not yet exist.

Based on our risk insights and the selected focus parts, we engage in dialogue with key suppliers, and we will intensify our efforts in order to outline and implement targeted risk mitigation measures.

Stakeholder Engagement

— Continuing dialogue with tier 1 and tier 2 suppliers of magnesium and aluminum
— Engagement and exchange with industry initiatives
— Dialogue with magnesium producers to better understand the n-tier perspective on sustainability

Outlook 2026

We plan to

— jointly work together with our suppliers to address sustainability risks within the supply chain
— start outlining a risk mitigation strategy for magnesium

→ Mica

Mica is often extracted through labor-intesive artisanal and small-scale mining in regions with weak regulation, informal work structures and widespread poverty, creating systemic conditions that enable severe social and environmental risks.

Due to the complex data situation for mica, we decided not to list mica mining and processing countries.

Key material-specific risks

Environment

- Soil pollution and land degradation
- Loss of biodiversity

Human Rights

- Child labor
- Forced or compulsory labor
- Support of armed groups
- Any form of discrimination

- Health and safety
- Freedom of association
- Payment of appropriate wages

Mica is a group of 37 silicate minerals with a layered or platelike texture. Mica minerals occur as flake and scrap mica as well as sheet mica. Mica is used in a variety of consumer goods, from paints and cosmetics for its shimmering effect to electronic devices for its heat resistance and low thermal and electrical conductivity.

Mica in our Supply Chain

The Volkswagen Group uses mica in various parts of its vehicles for both its shimmering effect and its heat resistance and low conductivity. Key areas of application include vehicle paints and thermal insulation for battery raw materials. Muscovite and phlogopite are the most commercially relevant types of mica and are each used in the automotive industry. The Volkswagen Group currently does not source mica directly.

Risk Assessment

Mica supply chains involve significant social and environmental risks, including human rights violations, child labor, and health and safety risks. These risks are particularly reported for the mica mining regions of Madagascar and India (particularly the states of Jharkhand and Bihar, known as the "mica belt"). In these areas, mica is predominantly mined via labor-intensive artisanal and small-scale mining (ASM). The root causes of poor working conditions and child labor are closely linked to very low living standards in these regions, exacerbated by weak law enforcement that enables illegal and unregulated mining activities. Given the limited opportunities for alternative sources of income, mica mining is frequently the only viable livelihood for many local communities.

In 2025, one of our focus areas was China, where mica is predominantly processed. Together with the **Responsible Mica Initiative** we extended our dialogue with Chinese mid-tier actors to increase transparency and raise awareness for sustainability risks associated with the upstream mica supply chains.

FOCUS PARTS

— Thermal insulation material for batteries
— Paint

Risk Mitigation

A key tool to support sustainability in the supply chain is our **mica specification sheet**, which is used across all brands of the Volkswagen Group and contains binding sustainable sourcing requirements for suppliers of parts and materials containing mica. The requirements include full transparency down to the mine site and compliance with the Responsible Mica Initiative's "Global Workplace ESG & Due Diligence Standard for Mica Processors". If mica is sourced from high-risk regions such as India, Madagascar, China or Brazil, additional due diligence measures such as mapping and third-party audits are required for mica processors and mines. If needed, corrective action plans are agreed upon and closely monitored by the Volkswagen Group. We are currently updating the mica specification sheet for new sourcing activities from 2026, introducing even more stringent requirements such as mandatory audits at the mining level for all focus parts containing mica.

Stakeholder Engagement

— Ongoing dialogue with tier 1 and sub-tier suppliers to strengthen due diligence practices and transparency
— Continued work with NGOs with a focus on Madagascar and India
— Field mission to Madagascar to engage with local processors, communities and other stakeholders, enhancing our understanding of mica-related challenges
— Sustained involvement in international initiatives and mica-related sessions during the annual OECD Forum

The lack of transparency in mica supply chains is a known challenge, and **direct stakeholder engagement** with our suppliers, international initiatives and NGOs is key to mitigating upstream risks. On behalf of the Volkswagen Group, Porsche is a member of the **Responsible Mica Initiative**, a growing multi-stakeholder coalition that aims to establish fair, responsible and sustainable mica supply chains. In the reporting year, we participated in several working groups and continued to support the implementation of the initiative's supply chain mapping and traceability system. Together with the **Alliance for Responsible Mining (ARM)**, we also published the "Mica CRAFT Code", a dedicated standard for ASMs in Madagascar. The project was supervised by an external steering committee, to which Porsche provided counsel.

Through the Responsible Mica Initiative, we support projects that increase transparency and minimize risks in mica mining. In 2026, Porsche plans to be one of the piloting companies in a project with the French Geological Survey (Bureau de Recherches Géologiques et Minières, BRGM) on the geological traceability of mica. For several years, Porsche has also backed the Responsible Mica Initiative's community empowerment programs for mica-dependent villages in Jharkhand and Bihar, India, with the goal of eradicating child labor and improving working conditions for mica miners. To date, nearly 230 villages have benefited from the project, which was extended into a second phase lasting through 2027.

In addition to India, the Responsible Mica Initiative has expanded its focus to the mining regions of southern Madagascar, which face similar underlying challenges. The initiative trains processing facilities on the Global Workplace Standard and supports artisanal miners in adopting the Mica CRAFT code. Porsche also supported the Responsible Mica Initiative's community empowerment program in Madagascar, now active in five southern mica mining communities.

During a **field trip** to Madagascar, organized in part by the Responsible Mica Initiative, a representative of Porsche visited mica-dependent communities and processors and met government agencies, gaining first-hand insights into progress on standard implementation and the social challenges that local mining communities face. At the same time, the Volkswagen Group's chief human rights officer visited Madagascar with UNICEF to meet civil society organizations and discuss options to protect children from violence and exploitation in artisanal and small-scale mica mining, including child labor. This visit was followed by a due diligence deep-dive meeting between the Volkswagen Group and a number of relevant NGOs and initiatives active in the mica sector in Madagascar.

Besides the Responsible Mica Initiative, the Volkswagen Group also actively engages in mica-related activities of the **Responsible Minerals Initiative (RMI)** and the **German sector dialogue** on the implementation of the National Action Plan for Business and Human Rights (NAP). Mica was one of the focus materials of the sector dialogue in 2024, and a group of automotive OEMs, including Porsche, agreed to continue joint work in 2025, aligning on the next steps and concrete actions.

Following exploratory field visits, a feasibility study and initial scoping in 2023 and 2024, Porsche partnered with other automotive companies to launch on-the-ground activities in Madagascar, aimed at eliminating child labor and improving the working conditions in mica mines and processing units. In the reporting year, the partners developed a comprehensive concept for long-term measures, selected mine and sorting sites, conducted a baseline assessment, and designated NGOs to carry out the activities. Implementation of these measures is scheduled to start in 2026.

Outlook 2026

We plan to

— deepen stakeholder engagement in Madagascar through on-the-ground activities
— advance supplier collaboration to improve transparency and promote the adoption of standards
— tighten requirements of the mica specification sheet
— continue to raise awareness of and actively participate in the Responsible Mica Initiative
— strengthen engagement with Chinese intermediaries to raise awareness for upstream sustainability challenges and foster collaboration

HIGHLIGHT

How Porsche and the Responsible Mica Initiative are working to make mica more sustainable

FANNY FRÉMONT
Executive director of the Responsible Mica Initiative

External viewpoint

I am the executive director of the Responsible Mica Initiative, a French not-for-profit association uniting companies, NGOs and stakeholders to transform mica supply chains from the mine to the final product. I lead our small team based in Paris in implementing member strategies, managing operations and driving real impact in mica mining communities in India and Madagascar.

Through our organization, we aim to tackle child labor, poor working conditions and poverty at the root of these problems. My personal motivation comes from field visits to remote mining villages in India and Madagascar and the desire for international trade that benefits everyone fairly. Families there often have no access to education, health centers or other public services, with mica as their sole source of income. Parents bring young children to the mines due to a lack of childcare; by the age of four or five, those kids pick mica flakes themselves—that's how child labor starts. Workers use basic tools without protection, facing cave-ins, injuries and lung diseases from dust.

The Responsible Mica Initiative focuses on India and Madagascar as the top countries for mica supply. Child labor persists as a cultural norm in both countries, which complicates our efforts. In Madagascar, services are scarcer and people often feel powerless, accepting aid but rarely pushing for more. In India, communities are more assertive, demanding rights from authorities, which energizes our programs. But families everywhere crave better lives for their children and prefer education over labor, once poverty eases.

On the ground, you can actually see the change created through the Responsible Mica Initiative's projects. For example, in Madagascar we opened a school planned for 50 children, and more than 200 children from surrounding villages wanted to attend. That shows how strong the demand for education is. Beyond building schools, we aim to boost family income through alternative livelihoods and help free up funds for education. In India, the results speak for themselves: children attend school by day, parents diversify their earnings, and kids emerge as community leaders driving change.

Porsche and the Volkswagen Group are vital partners of the Responsible Mica Initiative, and in turn our project is very relevant to achieving sustainable supply chains. Mica is ubiquitous in vehicles—paints, coatings, batteries, sensors, motors, plastics—with no viable replacement or recycling option. Supply chains are long and opaque, ending at remote mines where child labor persists due to poverty.

Individual companies alone would lack reach; together, companies from different industries along with civil society organizations and NGOs joining forces under the Responsible Mica Initiative can multiply impact. For example, the Volkswagen Group can amplify our voice with governments, pushing enforcement of child protection laws and mica formalization. The Volkswagen Group's supply chain leverage—relaying Responsible Mica Initiative standards to suppliers—drives compliance; what remains the individual responsibility of members.

Challenges like lack of transparency in decision-making, weak governance and poor wages persist in the countries, demanding stakeholder alignment to drive formalization and enforcement. Together, we co-create shared tools for traceability and training, pooling expertise across industries.

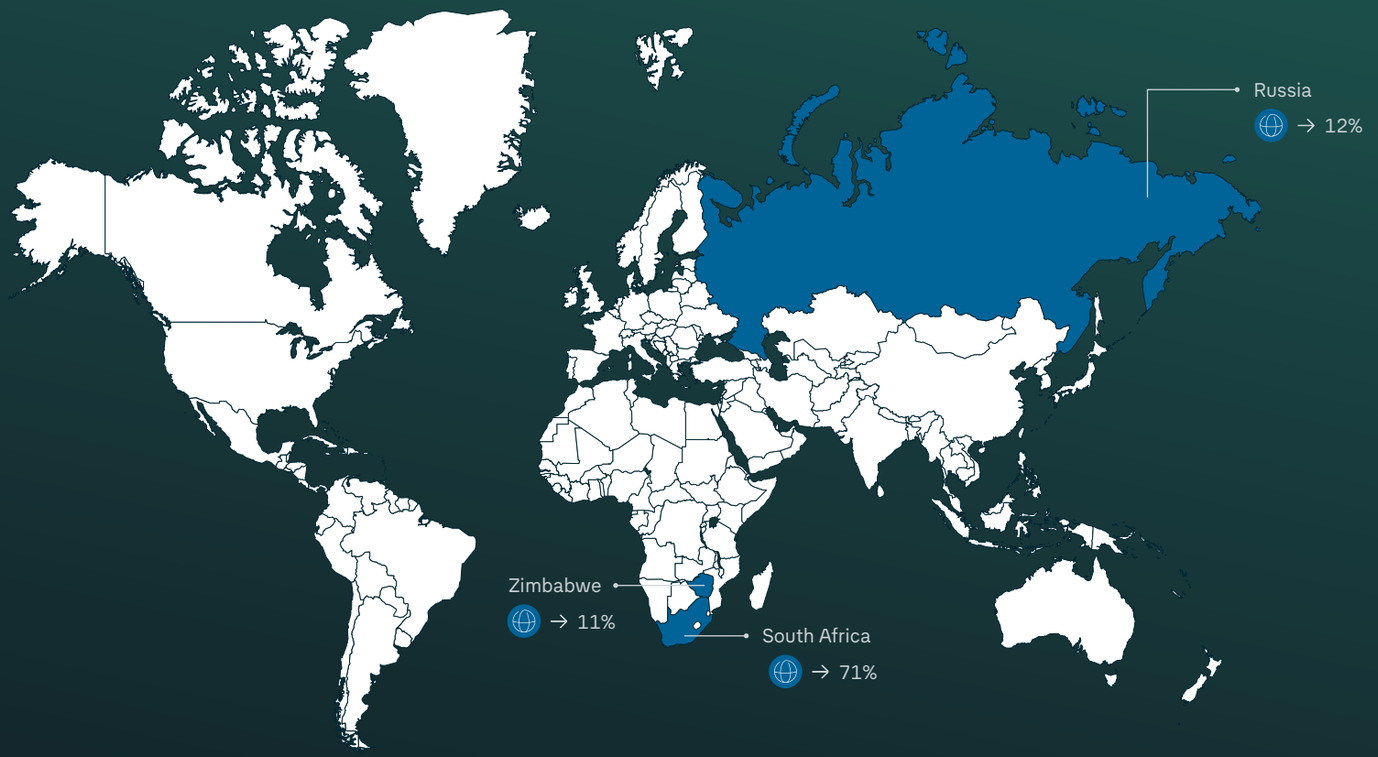
What motivates me to continue is what I see in the field: when I meet a child who tells me they now attend school and their sister has avoided early marriage, I know we are on the right path. I travel to India and Madagascar yearly, witnessing programs expand in these critical regions. Representing the Volkswagen Group, Porsche's commitment since 2020 has been instrumental in fueling our scale-up and delivering measurable progress, alongside all our other members.

→ PGM

PLATINUM GROUP METALS

PGM supply chains are shaped by labor- and capital-intensive mining with complex social dynamics, weak community conditions and hazardous processing steps, creating systemic conditions that enable severe human rights and environmental risks across extraction and refining.

Countries of origin



Top 3 platinum mining countries (global)

Source: USGS, 2025 estimates.

Key material-specific risks

Environment

- Air pollution
- Water pollution and consumption
- Soil pollution and land degradation

Human Rights

- Support of public or private security forces
- Any form of discrimination
- Health and safety

Community Life

- Protection of the rights of local people

Platinum group metals (PGM)—comprising platinum, palladium, rhodium, ruthenium, iridium and osmium—are precious metals that naturally occur together and are produced from the same ore. PGMs are the densest known metal elements and are characterized by exceptional corrosion resistance and durability. Owing to their high economic value and diverse industrial applications, they are often recycled.

PGM in our Supply Chain

The automotive industry is the primary consumer of platinum group metals (PGM), predominantly utilizing them as catalysts in catalytic converters of ICE vehicles to reduce exhaust emissions. The supply chain for PGM is complex, particularly at the refining and processing level. During the reporting year, the Volkswagen Group sourced PGM both directly and indirectly. For indirectly sourced PGM, the Volkswagen Group has not yet achieved full traceability back to the mine.

Risk Assessment

The Volkswagen Group systematically analyzes the risks associated with the extraction and processing of platinum group metals. We have identified and prioritized impacts on human rights, local communities and the environment as the most salient risk areas.

PGMs are often mined together with copper and nickel in both open-pit and underground mining operations. Their extraction is labor- and capital-intensive. Although PGM mining takes place in several countries, most production is concentrated in South Africa. There, the sector has historically been associated with low wages, occupational health and safety concerns, labor rights violations, and recurring cycles of violence at mine sites and in the surrounding communities.

These human rights risks are rooted in a multifaceted and complex context shaped by historical conflict lines ranging from apartheid to informal settlements of migrant workers, as well as structural challenges such as lack of education, high unemployment and poverty. As mines near the end of their lifecycle and mining activity is expected to decline over the coming years, people in mining-dependent communities face an increasingly uncertain future. While PGM mining is not the root cause of these problems, we will need to mitigate the risk of PGM mining as a contributor to these negative social and human rights impacts in order to achieve a sustainable supply chain.

Risk Mitigation

The Volkswagen Group employs a multi-pronged approach to mitigate the risks within its complex PGM supply chains. A key tool to increase transparency and fulfil due diligence obligations is the adoption of common **standards**. The Volkswagen Group is a member of the Initiative for Responsible Mining Assurance (IRMA) and has selected it as the preferred mining assurance standard. We actively encourage PGM mining companies in our supply chain to undergo, or prepare to undergo, an IRMA audit. For directly procured PGMs, an IRMA audit is a contractual requirement for the mine sites. PGM mining companies are increasingly receptive to audits, with most committing to the IRMA framework. To date, in South Africa, one mining company has completed IRMA audits on four mine sites with achievement levels above 50, while another company has completed audits for two mine sites. Two additional mining companies plan to complete the audit process between 2026 and 2027. The status of IRMA certification and self-assessment of primary producers is available on the website of the International Platinum Group Metals Association (IPA) and IRMA.

FOCUS PARTS

— Catalytic converters

Stakeholder Engagement

— Ongoing dialogue with PGM suppliers, down to the mine site level
— Continuing engagement with key members of the Marikana Coalition, including quarterly meetings with the Marikana Coalition Steering Committee

Outlook 2026

We plan to

— maintain stakeholder engagement to ensure their perspectives are incorporated into our due diligence efforts
— continue engagement and support for the Marikana Coalition
— promote IRMA standards by encouraging mining companies to progress toward full IRMA certification

As a pilot for the Volkswagen Group, Scania has introduced sustainability requirements for suppliers through a **PGM specification sheet**, which is used for the procurement of focus parts containing PGMs. The sustainability requirements include transparency, certification and audit requirements in line with industry good practices (such as IRMA standards). The Volkswagen Group sources exclusively from suppliers that conform to the London Platinum and Palladium Market (LPPM) Responsible Sourcing Guidance, which requires tier-2 suppliers to source exclusively from refiners that have undergone a due diligence audit and have therefore provided proof of adequate human rights due diligence management systems.

To manage the risks in our supply chain, we also consistently look beyond our tier-1 suppliers to identify areas with the greatest adverse impact and prioritize mitigation efforts. In 2025, the Volkswagen Group continued engaging with various supply chain actors and global initiatives, with a particular focus on the PGM mining sector in South Africa.

On behalf of the Volkswagen Group, Scania participates as a partner and co-founder of the Marikana Coalition project (see → highlight box), working to provide a future beyond mining for children in the platinum mining town of Marikana. During the reporting period, Scania also continued its involvement with other global and local **initiatives**, including the NIR (International Council of Swedish Industry), a member-based organization that promotes sustainable business in complex markets, and Business Sweden's Global Sustainable Mining Program.

HIGHLIGHT

Marikana, South Africa: a future beyond mining

In 2025, Scania continued to support the Marikana Coalition, established in 2023 to foster sustainable social development in South Africa's mining and mining-affected communities. Scania works with Sibanye-Stillwater, the NGO Afrika Tikkun, the Mineworkers Development Agency (MDA) and other industry partners to give children education for a future beyond mining in a region with high rates of unemployment, a chronic lack of schools and many other social problems.

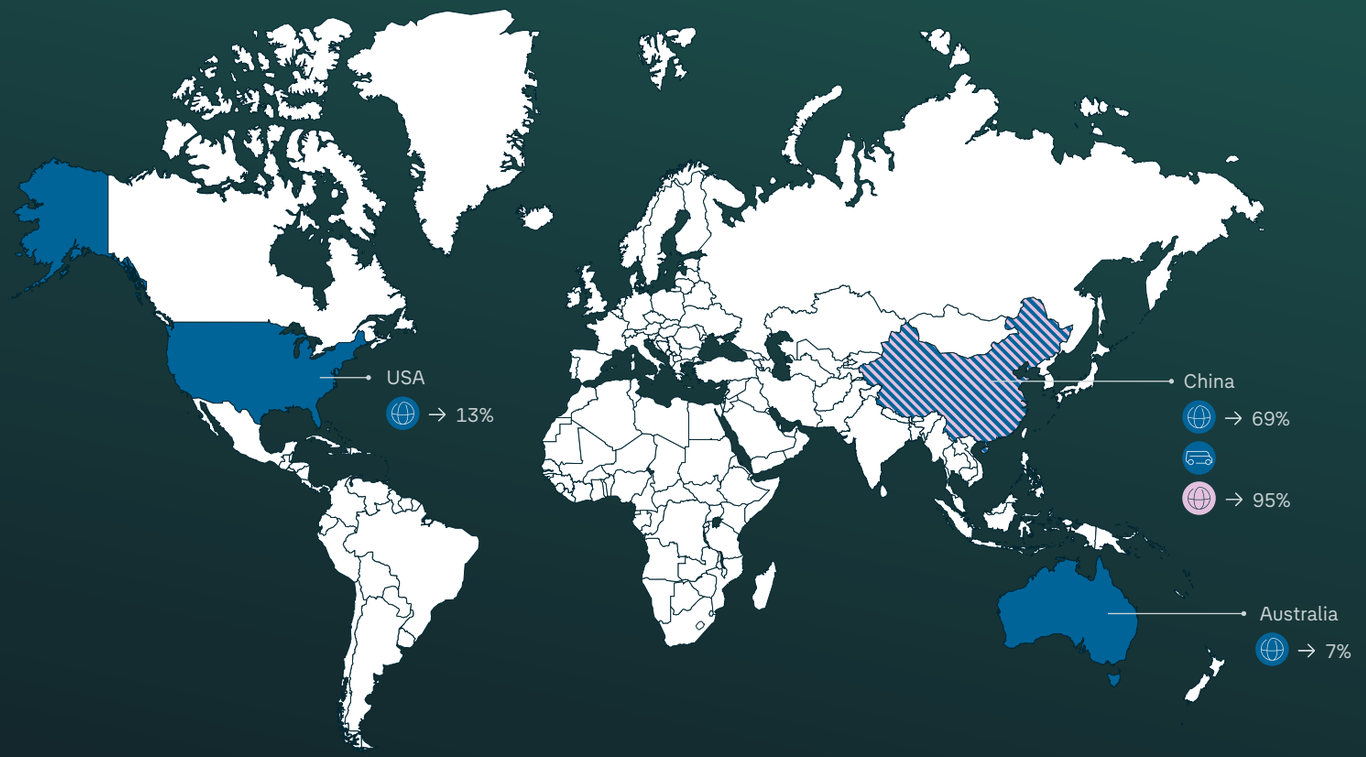
The initiative repurposed a disused mine structure into an educational facility for children in the platinum mining town of Marikana, equipping students with skills and career pathways beyond mining. The Marikana Centre delivers after-school support and occupational training as well as a safe social hub for young people in the community. In 2025, over 1,400 individuals were enrolled at the youth center and 376 children and youth benefited from academic support or worker readiness training. Staffed by participants from a local unemployment program, the center's team completed intensive two-week training in leadership and management skills. During 2025, the facility's expansion was finalized, expanding capacity to serve more children and youth in Marikana. In addition, a qualified social worker joined the Marikana Centre to provide psychosocial support to children and youth, targeting common local issues such as trauma, family stress and violence exposure.

→ REE

RARE EARTH ELEMENTS

Rare earth production is geographically concentrated and involves chemically intensive processes. Managing the associated risks requires not only regulatory frameworks, but also adequate infrastructure, transparent monitoring systems, and the consistent enforcement of environmental and social standards.

Countries of origin



Mining country Volkswagen Group · Top 3 mining countries (global) · Top smelting and refining/processing country (global)

Source: USGS, 2025 estimates; GCMRI, 2025 estimates.

Key material-specific risks

Environment

- Hazardous substances
- Air pollution
- Water pollution and consumption
- Handling and disposal of waste
- Soil pollution and land degradation
- Loss of biodiversity

Human Rights

- Child labor
- Forced or compulsory labor
- Support of armed groups
- Health and safety

Rare earth elements refer to a group of 17 chemical elements: the 15 lanthanides plus scandium and yttrium. REE are not as rare as the name may imply, but minable concentrations are low and the process of separating them from other elements is technically challenging and complex. REE are valued for their conductive and magnetic properties. They are used in many electronic devices, from smartphones to electric engines and LCD screens.

REE in our Supply Chain

Within the Volkswagen Group, rare earth elements (REE) are mainly used in permanent magnets for electric vehicles. In addition, rare earth oxides, metals and alloys are also used in exhaust systems, catalytic converters and loudspeakers. The majority of our REE volumes consist of four light rare earth elements (LREE): neodymium, cerium, praseodymium and lanthanum. Heavy rare earth elements (HREE)—mainly dysprosium (Dy) and terbium (Tb)—are used in smaller quantities mainly to enhance thermal stability in EV traction motor magnets.

FOCUS PARTS

— Permanent magnets in EVs
— Front and converter exhaust systems
— Catalytic converter coating

The Volkswagen Group sources REEs indirectly through parts manufacturers. China continues to dominate the global rare earth supply chain across multiple critical stages of production, from raw material extraction and processing to permanent magnet production. With the shift to vehicle electrification and clean energy, we expect the demand for REE to keep rising. While new sourcing locations have emerged globally over the past years, China's dominance and recent trade tensions have become critical global concerns.

Risk Assessment

Rare earth production involves significant environmental and social risks. All extraction and processing methods rely on hazardous and partially radioactive chemicals that can severely pollute water, air and soil, impacting local communities and requiring robust measures to protect worker health and safety. Additional supply chain risks include conflict financing and other serious human rights risks. Notably, HREE from unregulated mines in conflict-affected Myanmar have seen a sharp uptake over the past few years, amplifying these concerns. Evidence suggests that non-state militias control and profit from these operations.

Regarding the strong dominance of China, there are only few publicly available sources that provide factual and recent information on sustainability in the Chinese REE sector overall. The Volkswagen Group therefore commissioned a third-party ESG risk assessment in 2024, including stakeholder mapping and interviews with Chinese civil society, industry and academic representatives, to complement our own desk-based assessment. The study focused on magnesium, graphite and REE with the aim of gaining more insight into sector dynamics and better understanding risk exposure, particularly in the Chinese context. Completed in 2025, the project validated our internal findings, pinpointing the highest ESG risks at mine sites as well as separation and metallization facilities in China and Myanmar. It highlighted persistent data limitations, particularly on social risks, due to political sensitivities.

While environmental regulation in China shows signs of improvement, enforcement gaps remain. Myanmar operations pose elevated risks from ongoing conflict, weak governance and human rights concerns. These insights have sharpened our risk prioritization, including targeted supplier engagement and the evaluation of potential audit activities.

Due to REE supply chain opacity and indirect sourcing, confirming—or excluding—precise origins of procured components remains challenging, and definitive conclusions on affected areas or communities are limited.

Stakeholder Engagement

— Dialogue with our direct suppliers of magnets and parts
— Exchange with NGOs and CSOs on REE mining in Myanmar
— Participation in multi-stakeholder initiatives such as the RMI

Risk Mitigation

Against this backdrop, the Volkswagen Group is pursuing a multifaceted risk mitigation strategy. Direct access to mine sites in key regions is restricted by national laws, export controls and geopolitical sensitivities, which significantly constrain on-the-ground verification. Our approach thus focuses on working with credible local stakeholders, civil society organizations, international initiatives and experts to gain deeper insight into social and environmental impacts on affected communities. These collaborations help us identify responsible sourcing pathways that prioritize human rights, environmental protection and community well-being.

In the reporting year, we expanded engagement with direct magnet suppliers in China, sharing risk assessments to foster transparency and joint problem-solving, while mine site visits were inhibited due to alleged legal restrictions preventing foreign companies from accessing mining areas. New export restrictions, framed as matters of national interest, severely constrained data sharing at the processing stage, further obscuring upstream visibility.

Multi-stakeholder collaboration is central amid these barriers to direct engagement with mine sites and processing facilities. In 2025, we continued our involvement with initiatives such as the Responsible Minerals Initiative (RMI) and Drive Sustainability, which provide frameworks for assessing ESG risks and promoting responsible practices in raw material supply chains. We further engaged with civil society organizations and the OECD on human rights due diligence, responsible mineral sourcing and the implementation of the EU Critical Raw Minerals Act (CRMA), including participation in an REE-focused event on regional circularity, innovation and supply chain resilience.

Regarding HREE potentially linked to supply chains involving civil-war-torn Myanmar and neighboring regions, the Volkswagen Group continued to actively assess options to engage with credible local partners in the reporting year. This included exploring avenues for collaboration that align with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Through these efforts, we aim to strengthen our understanding of the situation on the ground and to identify responsible sourcing pathways that prioritize human rights, environmental protection and community well-being.

Alternatives to primary REE

The Volkswagen Group is evaluating alternatives to primary REE sourcing and continues to engage with REE recycling facilities to better understand the potential of diversifying supply chains. At the same time, our R&D teams are assessing new technical concepts to reduce the HREE content in EV permanent magnets.

The CRMA sets an ambitious goal of covering 15% of annual strategic raw material consumption (including REE) from recycling by 2030. This ambition faces hurdles, as current REE recycling rates remain negligible and technically challenging. Industry advances focus on reusing scrap and "swarf" (waste from cutting permanent magnets), preparing for end-of-life EVs and wind turbines.

In the reporting year, the Volkswagen Group continued to participate in pilot projects with research institutes, magnet manufacturers and recycling facilities to assess the dismantling and recycling of permanent magnets from rotors, enabling reuse and reducing primary material reliance. A cross-departmental project also aims to recover REE-containing production waste from European sites for closed-loop reintegration, bolstering supply chain resilience in line with the CRMA.

Outlook 2026

We plan to

— continue to push for sustainability requirements and audits for tier 2 and tier 3 suppliers

— pursue a resilient REE supply chain strategy, including recycling, substitution and alternative origins

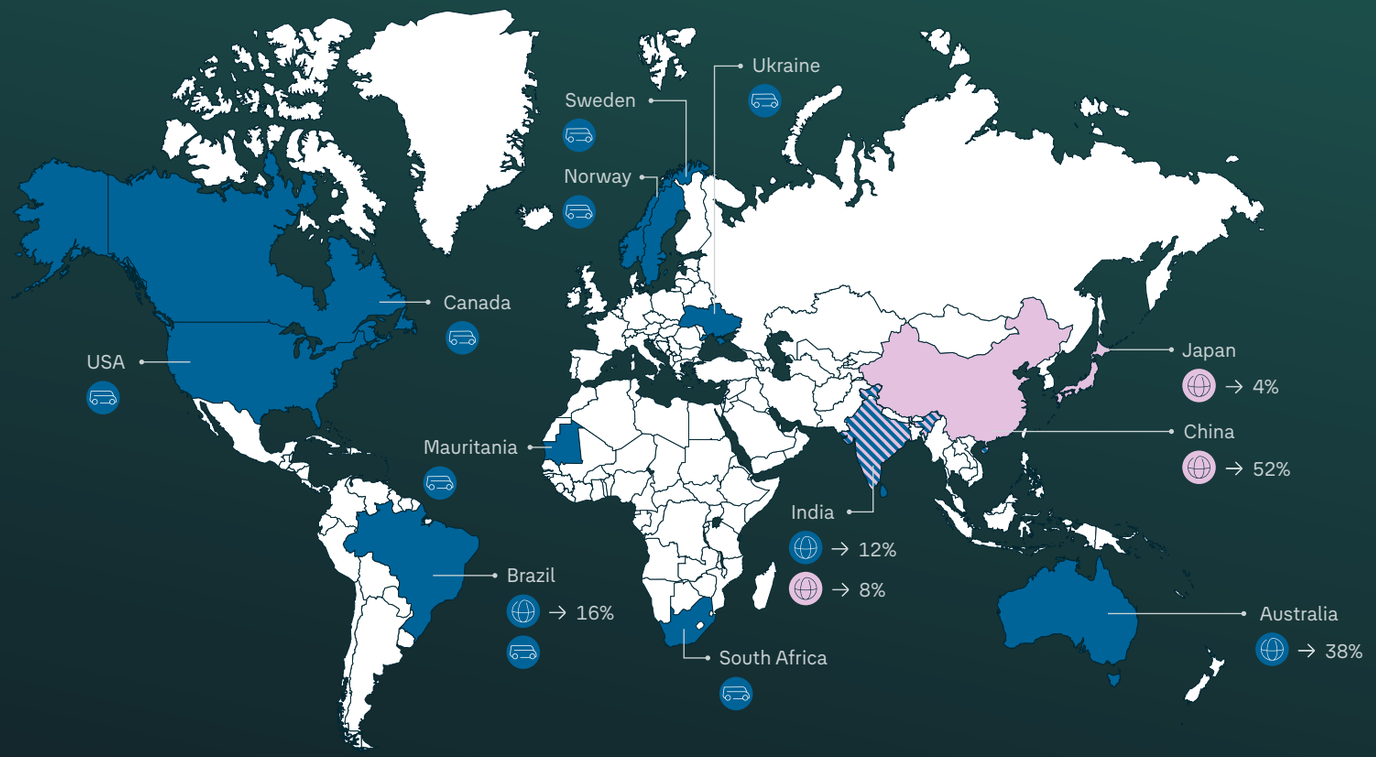
— evaluate the potential for supplier capacity building with the Chinese REE sector to support ESG compliance

— assess options for meaningful engagement in Myanmar

Steel

Steel production depends on iron ore mining in large open-pit operations, often located in forested regions and involving intensive resource use. These conditions, combined with energy-intensive processing, create systemic environmental and social risks across the upstream supply chain.

Countries of origin



Iron ore mining countries Volkswagen Group | Top 3 iron ore mining countries (global) | Top 3 smelting and refining/processing countries (global)

Source: USGS, 2025 estimates.

Key material-specific risks

Environment

- Air pollution
- Water pollution and consumption
- Handling and disposal of waste
- Soil pollution and land degradation
- Loss of biodiversity

Human Rights

- Forced or compulsory labor
- Health and safety

Community Life

- Forced evictions or expropriations
- Protection of the rights of indigenous peoples
- Causing harmful environmental change

Steel is made from the combination of iron and carbon in the classic blast furnace method and is one of the world's most utilized materials. It is used in buildings, infrastructure, transportation vehicles, tools, machines and much more. Many other elements may be added for different grades of steel.

Steel in our Supply Chain

Although steel has been partially replaced by aluminum for lightweighting, it remains essential in vehicle construction due to its excellent mechanical properties. It is used in body structures, panels, doors, powertrains, suspension, steering and braking systems and is also the material of choice for generators, electric engines and EV structural components. Advanced High Strength Steels (AHSS) enable lighter vehicles.

To support local sourcing near production sites, the majority of our steel comes from European suppliers.

Risk Assessment

Iron ore mining and steel production are large-scale, mechanized operations. Iron ore is typically extracted via open-pit surface mining, though large underground mines also exist. With around 50% of deposits located in forested areas, biodiversity and environmental risks are systemic. Production is often integrated at steel mills combining blast furnaces, steelmaking, rolling and galvanizing. Blast furnace steelmaking is highly energy-intensive, generating significant CO_2 emissions, air pollution, and substantial water use for cooling and processing.

FOCUS PARTS

— Center pillar
— Body sheets

Most steel risks stem from upstream supply chains, particularly for the primary materials coking coal and iron ore. Key salient risks we identified include natural resource use and associated environmental impacts, as well as occupational health and safety, particularly in mining operations. Iron ore mining also poses risks to local communities. In addition to soil pollution and land degradation in the affected areas, mining operations can also lead to involuntary relocation, which disrupts livelihoods and is often inadequately compensated.

The Volkswagen Group is working to improve supply chain transparency and better understand specific exposures. In the reporting year, we continued and expanded our dialogue with key steel suppliers, presenting our risk analysis and learning about sustainability efforts in their upstream supply chains.

Risk Mitigation

We also maintained dialogue with our steel suppliers to leverage their influence for supply chain risk mitigation. Volkswagen has piloted a supply chain questionnaire and aims to develop sustainability specification parameters, with a focus on creating transparency around coal and iron ore origins. This will support the definition of further risk mitigation measures.

However, while ESG industry standards covering a range of ESG issues are evolving, there is not yet enough certified material on the market to make this a prerequisite for sourcing.

The Volkswagen Group is continuing to review steel-specific industry initiatives and certification pathways.

Decarbonization

Steel is one of the Volkswagen Group's most important production materials and is a key focus for supply chain decarbonization. The Group aims to increase the share of low-carbon green steel used in its vehicles, expanding partnerships with steel suppliers using hydrogen and renewable energy.

Although the projects are not covered by the RMDDMS, these initiatives positively impact the steel supply chain, as renewable-energy-based production reduces adverse environmental and social impacts in mining and processing regions.

Stakeholder Engagement

— Dialogue with key direct suppliers on upstream transparency and risks related to coal and iron ore
— Reviewing options to join steel-specific industry initiatives

Outlook 2026

We plan to

— broaden application of the supply chain questionnaire to additional steel sourcing activities
— advance the development of sustainability specification parameters
— intensify engagement with our steel suppliers and relevant industry initiatives

3TG

TIN, TANTALUM, TUNGSTEN AND GOLD

3TG supply chains often originate in artisanal mining regions such as the DRC and its neighboring CAHRAs, where weak governance, illegal taxation and livelihood dependence on mining create systemic conditions that enable severe human rights abuses and environmental harm.

Because 3TG metals comprise four different raw materials with a large total number of countries of origin, we decided against visualizing them on a world map. Instead, the 3TG smelters and the countries and territories of origin we identified are listed in Annexes III and IV of this report.

Key material-specific risks

Environment

- Hazardous substances
- Air pollution
- Water pollution and consumption
- Handling and disposal of waste
- Soil pollution and land degradation
- Loss of biodiversity

Human Rights

- Child labor
- Forced or compulsory labor
- Support of armed groups
- Any form of discrimination
- Health and safety
- Payment of appropriate wages
- Plant safety

Community Life

- Forced evictions or expropriations
- Protection of the rights of local people
- Causing harmful environmental change

3TG metals—also called "conflict minerals"—include the metals tantalum, tin, tungsten and gold, which are extracts of the minerals cassiterite, columbite-tantalite and wolframite, respectively. 3TG metals are used in small quantities in a wide range of electronic products and are considered critical for the electronics industry and other industries.

3TG metals in our Supply Chain

The Volkswagen Group does not source 3TG metals directly but rather indirectly procures them through their presence in a wide variety of parts and components. This ubiquitous yet diffuse usage creates key challenges in 3TG due diligence: it complicates risk assessment and prioritization within the supply chain and makes it difficult to identify focal parts for targeted due diligence efforts. Tracing the upstream supply chains becomes even more challenging considering that the metals typically enter our complex supply chains several levels upstream, where we do not have direct contractual relationships, which is also true for our key tier 1 suppliers. As a result, transparency remains a challenge, and we report refiners and smelters from deep in our n-tier supply chains as potential suppliers without being able to actually trace the material batches for certain products.

FOCUS PARTS

— Electric motor
— Various automotive parts
— Electronics

According to prerequisites in our contractually binding Code of Conduct for Business Partners (see below), we expect our suppliers and sub-suppliers to avoid all minerals from conflict-affected smelters and refiners. Nevertheless, in line with OECD guidance, the aim is not to ban the procurement of conflict minerals that originate in conflict-affected and high-risk areas, but to promote sourcing from responsible sources within those regions.

Risk Assessment

As part of the annual general risk assessment, the Volkswagen Group conducts desktop research on the salient and systemic risks associated with 3TG metals. Nearly all risk categories defined in the Volkswagen Group's RMDDMS apply to the group of 3TG conflict minerals. We identified human rights risks, including child labor and support for non-state armed groups and/or public or private security forces, as the main systemic social risks. The salient environmental risks are pollutants and hazardous chemicals in mining discharge.

The four 3TG metals originate from diverse geological areas. As with most other minerals, the highest risks for 3TG occur at the mining level. 3TG minerals are mined in both large-scale mining (LSM) and artisanal and small-scale mining (ASM), with ASM most prevalent and often involving manual methods, limited mechanization, and inadequate health and safety measures. Given the lack of alternative livelihoods, many local communities depend on income from mining, and this makes workers vulnerable to precarious conditions and labor rights violations. Moreover, poor management of hazardous chemicals and waste leads to adverse environmental impacts in mining regions. Significant risks also persist from armed group interference, illegal taxation and smuggling.

Stakeholder Engagement

— Member of the RMI's Gold Working Group
— Dialogue with our key suppliers and with selected suppliers listing high-risk smelters in their supply chains
— Promotion of the RMAP for smelters and refiners

Outlook 2026

We plan to

— enhance CMRT response rates from suppliers to further improve transparency
— increase the share of RMAP-conformant 3TG smelters in our supply chain
— continue engaging key tier 1 suppliers, underscoring the importance of sustainable 3TG supply chains
— conduct a study on effective 3TG risk mitigation measures and reassess our approach.

Our 3TG due diligence follows the OECD Minerals Guidance's "choke point approach", focusing on smelters and refiners as critical points in the complex 3TG processing chain. We first identify these facilities using supplier data; then we aim to ensure that they source responsibly. In line with the OECD Guidance, our approach follows all five steps of the due diligence framework—establishing strong company management systems, identifying and assessing risks in the supply chain, implementing time-bound risk mitigation measures, supporting independent third-party audits of smelters and refiners, and publicly reporting on due diligence efforts.

During the reporting year, we continued to work towards transparency along our 3TG supply chain. To collect supplier data, we use Assent's supply chain management solution and third-party database, and we ask our suppliers to complete the **Conflict Minerals Reporting Template (CMRT)**. The CMRT is a standardized tool for supply chain due diligence for 3TG minerals developed by the Responsible Minerals Initiative (RMI) and applied globally. In addition to identifying smelters and refiners, the CMRT also requires the countries of origin of the mined material to be listed. This approach enables efficient data collection from our extensive supplier base.

In 2025, we focused on analyzing the 3TG metal content of parts and components in order to identify suppliers for targeted collaboration on transparency. During the reporting period, we identified and engaged with approximately 1,500 suppliers, accounting for nearly 200,000 different parts.

In line with the OECD Minerals Guidance, we continuously monitor for red flags, indicating suppliers from conflict-affected and high-risk areas that are prone to human rights violations. We collaborate with our suppliers to increase transparency, excluding smelters that are not willing to strive for improvement.

We request all in-scope direct suppliers of parts and components that may contain 3TG to submit the CMRT on an annual basis. The resulting list of smelters, refiners and countries of origin is updated every year and disclosed in this report (see → **Annexes III and IV**), in line with the Volkswagen Group Responsible Raw Material Policy. Please note that we have obtained the country information from the CMRT, which is provided at the company level rather than for the specific supply chains of the Volkswagen Group. As a result, the lists include potential suppliers, and we cannot definitively confirm or rule out their involvement.

Risk Mitigation

As a downstream buyer of complex automotive components, the Volkswagen Group employs a multi-pronged risk mitigation strategy for 3TG minerals. We collaborate with key tier 1 suppliers through meetings and training sessions to raise awareness for responsible sourcing, including the use of the CMRT and our supplier portal.

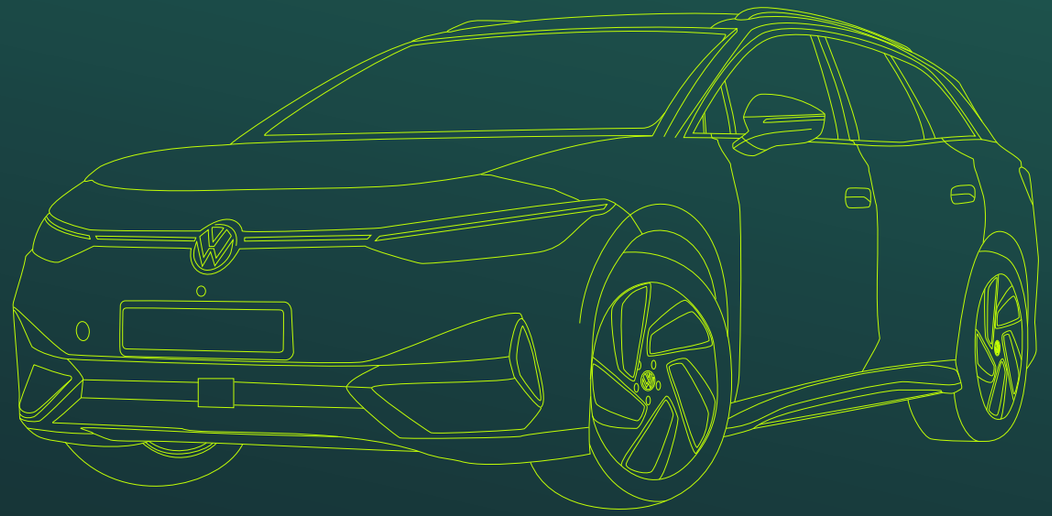
We also partner with industry stakeholders, as harmonized standards and audits are key to identifying and mitigating risks. The Volkswagen Group maintains active membership in the **RMI** and participates in its Gold Working Group, which met during the reporting year to address risks and leverage its collective influence to promote responsible practices upstream.

As the Volkswagen Group does not directly purchase any 3TG metals, we use our contractually binding **Code of Conduct for Business Partners (CoC BP)** as an instrument to mandate that suppliers of parts and components comply with the OECD Minerals Guidance, ensuring responsibly sourced 3TG in their supply chains.

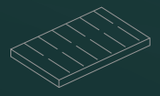
Suppliers' 3TG smelters and refiners must conform to the RMI's **Responsible Minerals Assurance Process (RMAP)**. Of the identified smelters in our supply chain, nearly 61% were RMAP-conformant at the end of 2025. The slight decrease in RMAP conformance compared to the previous reporting year is due to the reduced number of globally available conformant smelters.

Biogenic Raw Materials

Cotton, leather, and natural rubber are key biogenic materials commonly used in automotive textiles, interiors, and tires.

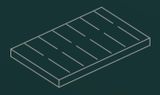


Battery Raw Materials



Lithium
Page 29

Cobalt
Page 32

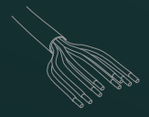


Nickel
Page 35

Natural Graphite
Page 38

Other Metals and Minerals

Aluminium
Page 42



Copper
Page 45

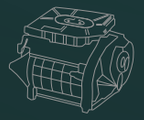
Magnesium
Page 47

Mica
Page 49

PGM
Page 53

REE
Page 56

Steel
Page 59



3TG
Page 61

Biogenic Raw Materials

Cotton
Page 65

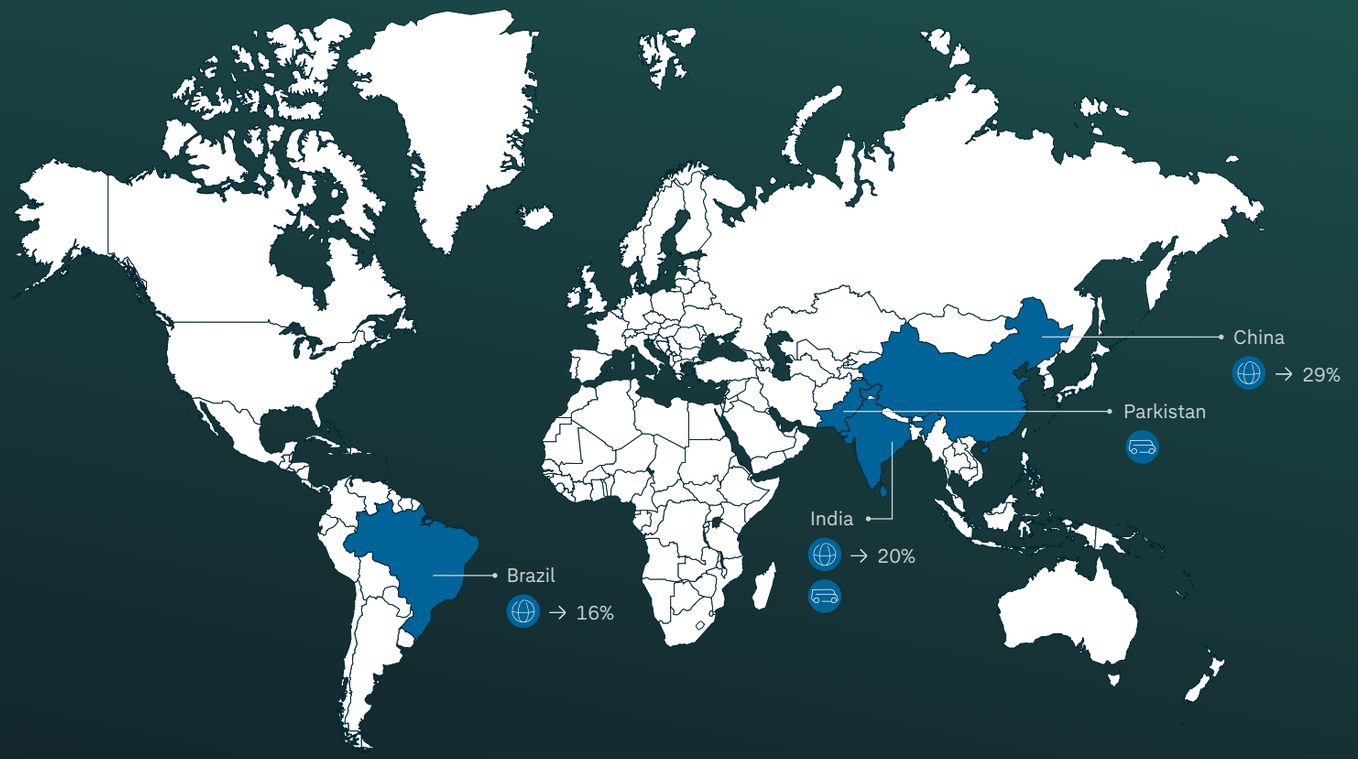
Leather
Page 68

Natural Rubber
Page 71

Cotton

Cotton is predominantly grown by millions of rural smallholders in regions with weak labor protections, low incomes and high dependence on agriculture. Fragmented supply chains and local processing near farming areas create systemic conditions that enable severe social and environmental risks.

Countries of origin



Production countries Volkswagen Group Top 3 production countries (global)

Source: FAS USDA, 2025 estimates.

Key material-specific risks

- For virgin cotton
- For virgin and recycled cotton

Environment

- Production and use of pollutants
- Air pollution
- Water pollution and consumption
- Soil pollution and land degradation
- Loss of biodiversity

Human Rights

- Child labor
- Forced or compulsory labor
- Support of armed groups
- Any form of discrimination
- Health and safety
- Trade union freedoms
- Payment of appropriate wages

Cotton is a soft, fluffy fiber that grows in a boll around the seeds of cotton plants. Nearly pure cellulose, it is most often spun into yarn or thread for textiles. Cultivation requires a long frost-free period, ample sunshine, moderate rainfall and substantial amounts of water. Beyond textiles, cotton is a highly versatile crop used for nets, filters and cotton paper as well as in bookbinding. In many countries, cotton significantly contributes to the livelihoods of millions of rural smallholders.

Cotton in our Supply Chain

The Volkswagen Group primarily sources products containing virgin cotton for workwear and personal protective equipment (PPE). Recycled cotton (together with synthetic fibers) is used for vehicle components such as insulation, interior trims and floor mats.

We do not source virgin or recycled cotton directly. The main countries of origin for this secondary material used in vehicle parts are Germany, Slovakia and Turkey.

FOCUS PARTS

— Engine compartment insulation
— Interior trims
— Floor mats
— Workwear and personal protective equipment (virgin cotton)

The typical supply chain for virgin cotton textiles and products encompasses several steps, from cotton farming, ginning, spinning and processing through to manufacturing. The structure of this supply chain varies greatly between regions and is influenced by the raw material's characteristics, including fiber length, color grade and fiber strength. While smallholder farmers account for the majority of global cotton production, there is a degree of vertical integration in processing and manufacturing, and these steps are geographically concentrated in a limited number of countries: China, India, Brazil, the United States and Pakistan are the world's top cotton producers and together represent the bulk of global output.

Risk Assessment

Cotton has been added to the Volkswagen Group's list of priority raw materials for the 2023 reporting period. In light of increasing supply chain regulations such as the Uyghur Forced Labor Prevention Act (UFLPA) and other human-rights-related regulations, we directed our focus to assessing the risks associated with the deeper levels of our cotton supply chains.

During the reporting year, we shifted our risk focus to workwear and PPE containing virgin cotton, as our vehicle focus parts **use only recycled cotton (with synthetic fibers)**, mainly from post-industrial sources. This was confirmed across the Volkswagen Group's regional production sites and has implications for our risk landscape, since the most salient and systemic risks are associated with the farming and processing stages of virgin cotton. Our approach to managing cotton-related risks therefore prioritized products containing virgin cotton, where we see greater potential to drive improvements, while sustainability risks are considerably lower for recycled cotton, with workers' rights remaining the key risk area.

Stakeholder Engagement

— Dialogues with tier 1 and tier 2 suppliers of virgin cotton products
— Discussions with the OECD and other intergovernmental organizations on best practices
— Engagement with circularity initiatives and certification schemes

Virgin cotton supply chains are fragmented, spanning multiple regions and stages of commodity trade. Fibers from several sources and countries may be combined into a single textile product, further complicating traceability. Based on our supply chain assessment, the cotton used for the Volkswagen Group's German production sites across all relevant brands is mainly sourced from India and Pakistan. The Volkswagen Group has identified and prioritized impacts on human and workers' rights as the most salient risk areas, which are compounded by negative environmental impacts.

In 2025 we continued our efforts to map the virgin cotton supply chains for workwear and PPE (e.g., gloves). We engaged with workwear suppliers for our European production sites to understand these structures, which often involve low-wage regions with potentially weaker workers' rights. We requested and partially received transparency data and initiated tier 2 dialogues to build trust, raise risk awareness and highlight due diligence obligations.

Risk Mitigation

In addition to our efforts to increase transparency, in the reporting year we assessed how sustainability criteria are currently embedded alongside conventional textile performance criteria—such as color fastness, abrasion, durability and absence of harmful substances—in technical specifications across the Volkswagen Group. Building on examples, we are developing recommendations to include certifications like GOTS, OEKO-TEX and Fairtrade as mandatory elements in fabric specifications, promoting consistent and responsible sourcing practices for future workwear sourcing activities. To strengthen traceability, we are also evaluating random isotopic testing, which scientifically validates cotton origin and verifies that high-risk regions linked to deforestation or forced labor are avoided for fabrics.

The Volkswagen Group engages with multi-stakeholder sustainability initiatives for virgin cotton and circular materials and is evaluating certification schemes for cotton textile and apparel products. However, existing standards mostly focus on environmental aspects like recyclability, with less emphasis on human rights and other risks in the upstream supply chain.

The Volkswagen Group is exploring more sustainable fabrics in vehicle interiors, including recycling discarded assembly line workwear for use in blended fiber yarn for seat covers. Further efforts aim to increase the use of recycled materials while maintaining highly durable, timeless products that meet customer expectations. As the textile industry and vehicle interiors shift toward monofabric applications, cotton use is gradually decreasing in favor of more recyclable PET-based materials.

Outlook 2026

We plan to

— develop and pilot a cotton specification sheet for workwear sourcing
— continue supply chain mapping beyond tier 2
— engage with initiatives for virgin cotton and circular materials and evaluate certification schemes

Leather

Leather supply chains stem from regions where intensive livestock farming, land use pressures and chemically intensive tanning combine with fragmented transparency, creating systemic environmental and social risks.

The available data on global leather production and tanning does not specifically represent figures for the automotive industry. Not every cowhide is suitable and used for leather production and not every cowhide is used in the automotive sector. For these reasons, we decided not to report any data on leather production or tanning.

Key material-specific risks

Environment

- Water pollution and consumption
- Soil pollution and land degradation
- Loss of biodiversity

Human Rights

- Health and safety
- Payment of appropriate wages

Community

- Forced evictions or expropriations
- Protection of the rights of indigenous people

Leather is a versatile material that has been used for centuries in various applications from clothing, footwear and accessories to upholstered furniture and vehicle interiors. It is stable, firm, flexible and durable.

Leather in our Supply Chain

The Volkswagen Group's brands use bovine leather as a preferred material for vehicle interiors because it combines aesthetic qualities with durability and flexibility. Sourced as by-products from the meat and dairy industries, hides are transformed through multiple processing stages—including pre-treatment, tanning and finishing—to convert them into leather and ultimately finished products. Some automotive interior leather companies run vertically integrated operations, owning both tanneries and, for example, vehicle seat facilities.

We do not generally exclude high-risk areas, such as regions in Brazil and Paraguay, as places of origin for leather products. Instead, we aim to establish traceability and implement enhanced due diligence measures. However, following the "local for local" principle—sourcing close to our respective vehicle production sites—the majority of the Volkswagen Group's direct leather suppliers are based in Europe and source hides from the region.

FOCUS PARTS

— Steering wheels
— Seats
— Interior components

Risk Assessment

Global leather supply chains face a number of sustainability challenges. Salient and systemic environmental risks are associated with intensive livestock farming: land use causing deforestation, soil degradation and loss of biodiversity; CO_2e emissions; and high water consumption. Livestock farming also raises animal welfare concerns, while tanning and finishing processes involve hazardous chemicals with impacts on water and wastewater. These adverse environmental impacts can also harm local and indigenous communities. Social risks include threats to workers' occupational health and safety.

The Volkswagen Group aims to increase transparency in the leather supply chains through regular supply chain mapping and the collection of additional supply chain data. In the reporting year, we continued desktop research to analyze our supply chains and worked with our direct suppliers as well as multi-stakeholder initiatives and NGOs such as the World Wide Fund for Nature (WWF).

Risk Mitigation

To mitigate risks in the leather supply chain, the Volkswagen Group enhances traceability to exclude high-risk suppliers, promotes harmonized standards through stakeholder engagement and supports key suppliers in responsible sourcing.

In 2025, we updated our leather specification sheet to further raise the level of ambition and integrate additional risk mitigation measures. Our direct suppliers of parts containing leather are requested to meet a number of leather-specific awarding criteria: they must specify all companies and locations where tanning, re-tanning and finishing process steps are carried out and provide transparency on the rawhide provenance (countries of origin). Rawhides and upstream material associated with deforestation or the conversion of natural habitats are excluded. If rawhides or upstream materials are sourced from high-risk countries prone to deforestation, the conversion of natural habitats, or the invasion of indigenous lands or protected areas, the Volkswagen Group requests additional due diligence measures, such as sub-supplier audits, sourcing from certified sources and the use of appropriate geo-fencing systems.

Stakeholder Engagement

— Ongoing dialogue with suppliers and sub-suppliers
— Active involvement in the Leather Working Group
— Continuing engagement with NGOs such as the WWF for expert guidance to further our sustainability requirements

Only rawhides from bovine raised for food production (by-products) may be used, and breeders must comply with the "Five Freedoms of Animal Welfare" defined by the Animal Welfare Committee. In addition, the increased level of ambition now requires a sustainability certificate from the Leather Working Group (LWG) at the gold level. The audit includes strict criteria, for example on water use and water pollution prevention in the tanning process as well as health and safety measures for workers that must be adhered to.

To develop best practices and advance existing sustainability standards, all Volkswagen Group brands are members of the **Leather Working Group**, a non-profit organization whose members represent more than one-quarter of finished leather production around the globe. During the reporting year, we actively supported the development of the new LWG Sustainability System, set to launch in 2026, comprising an updated leather production standard including labor and social responsibilities and a new chain-of-custody standard. We were involved in several consultation rounds, providing input from a downstream automotive perspective.

Outlook 2026

We plan to

— continue working towards traceability across the supply chain with our suppliers;
— implement increased sustainability requirements through our updated specification sheet.

→ Natural Rubber

Natural rubber is predominantly produced by millions of smallholder farmers operating in informal, poorly regulated supply chains. This fragmented structure, combined with low incomes and weak oversight, creates systemic conditions that enable major social and environmental risks.

Countries of origin

Production countries Volkswagen Group Top 3 production countries (global)

Source: FAO, 2025 estimates.

Key material-specific risks

Environment

- Hazardous substances
- Soil pollution and land degradation
- Loss of biodiversity

Human Rights

- Child labor
- Forced or compulsory labor
- Health and safety
- Payment of appropriate wages

Community Life

- Forced evictions or expropriations
- Protection of the rights of indigenous people

Natural rubber is derived from the rubber tree Hevea brasiliensis, grown primarily in the tropical regions of Southeast Asia and West Africa. It is a key raw material in tires and other products due to its wear resistance.

Natural Rubber in our Supply Chain

Rubber is a key raw material for mobility: there are no high-performance tires without natural rubber, and more than 70% of the world's natural rubber is used in tire production. Natural rubber can withstand both heat and cold, and the strength of rubber is the key to the tires' durability and ability to support the vehicle's load. Besides tires, rubber is also used for other vehicle parts such as seals, bearings, brake pads, wiper blades, mats and electrical wire covers. The Volkswagen Group does not directly source natural rubber.

Risk Assessment

Natural rubber supply chains are highly fragmented and complex: the majority of global natural rubber production originates from smallholder farms, processed and sold through multiple tiers of intermediaries before reaching manufacturers of tires and other products. Achieving full traceability for natural rubber is complicated by the sheer number of vehicle parts containing rubber. Another challenge is that, for purchased products, it is not immediately obvious whether they contain natural or synthetic rubber.

FOCUS PARTS

— Tires

Preparing for the EU Deforestation Regulation (EUDR)

The EU Regulation on deforestation-free products (EU Deforestation Regulation) establishes due diligence obligations for companies placing seven commodities—cattle, cocoa, coffee, oil palm, soya, wood and natural rubber—and a wide range of derived products on the EU market or importing/exporting them. The objective is to ensure that these products are not linked to deforestation and have been produced in compliance with local laws. As of December 2025, application has been postponed by another year, with large and medium-sized companies now generally required to comply from December 30, 2026, and small companies from mid-2027. The EU approval in December 2025 also introduced simplifications while keeping the overall structure of the EUDR intact. Drive Sustainability has commissioned a **scoping document on the EUDR**, addressing practical implications for the automotive industry and remaining open questions of the new regulation.

We implemented a traceability system to collect data and perform risk management.

To comply with the EUDR requirements, the Volkswagen Group has established the necessary internal structures and processes. This includes, for example, developing a compliance management system and broadening risk assessment to include a variety of rubber-containing parts beyond our focus application in tires. To this end, we have identified our direct suppliers in scope and are preparing to map their upstream supply chains. We implemented a traceability system to collect data and perform risk management using AI tools and satellite geolocation data for a large number of in-scope suppliers. Through this platform and these defined internal processes, we strive to efficiently collect the necessary information and assess the risks. Going forward, the IT solution will also support the creation of due diligence statements for EUDR-relevant products to ensure deforestation-free processes.

The Volkswagen Group has identified hazardous substances, pollution and land degradation as the most salient and systemic environmental risks. These risks have an adverse impact on biodiversity as well as on the indigenous and local communities in the regions. The most salient and systemic social risks along our natural rubber supply chain are child labor and forced labor, payment of adequate wages, and health and safety.

Risk Mitigation

The Volkswagen Group collaborates with key suppliers to promote best social and environmental practices across the value chain. Based on risk assessments, we implement mitigation actions and capacity-building projects, such as our lighthouse CASCADE (Committed Actions for Smallholders Capacity Development) initiative, to support smallholder farmers on their sustainability journey (see → **highlight box**).

We also continued our engagement as an active member of the Global Platform for Sustainable Natural Rubber (GPSNR), a multi-stakeholder organization advancing responsible sourcing and a sustainability framework for natural rubber. In 2025, a representative of the Volkswagen Group attended the annual GPSNR meeting in Singapore, contributing the perspective of an automotive OEM.

During the reporting year, the GPSNR launched its Assurance System, a standardized and independent assurance process requiring members from 2027 onwards to identify human rights and environmental risks within their supply chains, report transparently on progress, and undergo third-party verification. The Volkswagen Group was actively engaged in the development and consulting rounds and has committed to adopting the Assurance System. Additionally, we further promote the Assurance System by working with many suppliers who are also members of the GPSNR.

In February 2025, a Porsche representative took part in a trip to Indonesia. In meetings with actors along the natural rubber supply chains, we deepened our understanding of sustainability strategies and risk analyses related to natural rubber. During a visit to an industrial rubber plantation, we gained insights into industrial rubber production and the differences compared with smallholder structures, including in terms of occupational safety, biodiversity and living conditions.

Our activities in the reporting year also focused on preparing for the EU Deforestation Regulation (EUDR) by establishing internal structures and processes (see → **box on EUDR**).

Stakeholder Engagement

- Strengthening ties with tier-1 tire suppliers, particularly for EUDR compliance
- Contributing actively to the GPSNR through membership and working groups
- Supporting capacity building for sustainable rubber with Indonesian stakeholders

Outlook 2026

We plan to

- finalize EUDR readiness
- continue GPSNR participation and prepare to implement the Assurance System
- continue supporting the CASCADE project

HIGHLIGHT

Supporting resilient natural rubber communities in Sumatra (1/2)

The CASCADE project (Committed Actions for Smallholders Capacity Development) in Sumatra continued in 2025 as a flagship capacity-building initiative for smallholder natural rubber farmers in the Jambi province, central Sumatra, Indonesia. Led by Porsche on behalf of the Volkswagen Group and the global tire manufacturer Michelin, it improves livelihoods through a comprehensive approach, for example by providing access to better farming techniques and sustainable practices.

By working closely with local communities, the first phase of the project has already enhanced the resilience of over 1,000 rubber smallholders. In 2025, CASCADE moved into a scale-up phase with the aim of supporting an additional 5,500 rubber farmers and their families via agronomic training and income diversification through intercropping.

During a trip to Indonesia in 2025, a Porsche team visited the project in Sumatra and met with smallholders and representatives from international and local NGOs. The discussions deepened our understanding about how approaches to smallholder development, such as intercropping, training and income generation, have already helped them to make their rubber cultivation more environmentally friendly and efficient while improving their living conditions. Following the trip, we continued to exchange ideas with the NGOs to promote sustainable development in the natural rubber sector.

External viewpoint 01

As Setara Jambi's field representative, I ensure the CASCADE project rolls out on time. I track progress through participatory monitoring, solve challenges and connect with stakeholders for better results.

Before the project was launched, as an organization working in farming communities, we worried about rubber farming's decline: low yields and weak government support drove land conversions to palm oil, upsetting social, economic and environmental balances.

CASCADE lets us help farmers directly. It's clear from their feedback: 85% received rubber training for the first time. This sparked a shift in mindset as they are clearing less land by burning and have started to protect creeks and clean water sources. Cultivation practices have improved, too: tapping methods and rotations now follow three harvests weekly instead of daily. They've started fertilizing and weeding, and some are growing ginger with homemade organic fertilizer.

And financial literacy is advancing as farmers have learned how to track income and expenses. Some are setting aside rubber sale proceeds to budget for fertilizers and garden maintenance. Early attempts at direct group sales to factories are also emerging, though still minor.

Farmers in the region have a strong desire to keep their rubber plantations thriving—plantations that they have long known as the main livelihood and that can also become an important source of income for women. They are committed to maintaining the quality of their latex and they hope for better yields and fair prices to sustain this livelihood.

IBU BAYA
field representative at the local NGO Setara Jambi

Scattered villages and old habits are challenges, but we mapped farmers, engaged leaders and had facilitators live in villages 15 days monthly for hands-on demonstrations.

I connect with farmers and village officials on a daily basis. We strengthen relationships to build trust, provide training activities, visit farmers and participate in community activities. To change habits, we promote their technical and practical skills, demonstrate practices, and monitor demonstration plots together. Seeing these small and gradual changes gives me immense energy and joy.

For Porsche, as the initiator with Michelin, CASCADE supports the sustainability of the vital rubber supply chain while enhancing smallholder economies, social conditions and environmental governance.

HIGHLIGHT

Supporting resilient natural rubber communities in Sumatra (2/2)

ADRIEN COVO
project manager
for Ksapa

External viewpoint 02

At Ksapa, we design and implement the CASCADE program for Michelin and Porsche. As project manager, I oversee the equipping of smallholder rubber farmers with essential tools while ensuring alignment between strategic objectives set with Porsche and Michelin as well as field-level execution.

We provide methodological tools and technical expertise to our local partner NGO partner, Setara Jambi. A risk assessment identified Jambi farmers' key challenges: low productivity, ageing populations and trees, diseases, pests, and the risk of shifting to palm oil. Local farmers—both transmigrants from Java and Sumatran natives—face poor initial support, limited inputs, and gender inequities, with women doing daily work without recognition.

Through a bottom-up field approach, we identified optimal training content on productivity enhancement, diversification and socio-environmental practices. We also pivoted intercropping from drought-affected cardamom to ginger in home gardens for better soil health and additional revenues.

Setara Jambi provides field training and motivates the farmers. Our responsibility is to monitor implementation and measure impact. For this, we leverage our SUTTI Digital Suite, a low-tech app with offline capabilities, voice features for data collection, peer discussions and client dashboards. Designed for Indonesia's advanced digital infrastructure, it promotes digital literacy: over 70% of enrolled farmers adopted it, averaging one hour weekly. Collecting feedback and building on our expertise and experience, we deduct actionable strategies with impact.

Over the years, CASCADE has successfully retained farmers in the rubber value chain mitigating risks and ensuring production sustainability. On the ground, we've measured tangible changes among 1,500+ farmers: 97% report satisfaction, 63% yield increases, 53% higher revenues from quality gains and less chemical use for tree longevity.

The project uniquely addresses production-level challenges to strengthen the entire downstream value chain to Porsche vehicles. It fortifies natural rubber—which is irreplaceable for tires—against productivity declines, aging assets, and climate risks.

For me, field time is crucial: collecting firsthand data from beneficiaries ensures the program's relevance for local challenges. I visit once or twice yearly to assess implementation and engage with the broader stakeholders.

05

Outlook for 2026

We consider due diligence in raw materials procurement an ongoing endeavor and will continue to implement and advance sustainability measures across the Volkswagen Group and our global supply chains. In 2026, we will focus on the following strategic priorities.

Strengthen supply chain compliance and audits

The Volkswagen Group aims to further expand its due diligence processes in 2026. Our goal is to intensify supplier audits, enhance digital risk analyses and apply stricter requirements in high-risk regions. We have already strengthened our Supplier Engagement Programs to promote the use of common standards and support progress towards certifications.

We will also continue to align our systems with new regulatory requirements, in particular the full implementation of the EU Battery Regulation, the EU Deforestation Regulation, and other EU raw materials regulations. In 2025, the effective dates of forthcoming due diligence laws such as the EU Battery Regulation were postponed to 2027, providing additional time for preparation. We have already integrated the core requirements into our RMDDMS processes, including mandatory specification sheets; enhanced transparency and controls; and tools such as questionnaires, third-party audits and Group-specific on-site assessments for battery raw materials (lithium, nickel, cobalt and natural graphite). By 2027, we aim to build capacity with suppliers and sub-suppliers, increase coverage with the newly developed tools, and obtain initial results ahead of the effective date.

A similar approach applies to the EU Deforestation Regulation, which has also been postponed, with large and medium-sized companies generally required to comply from the end of 2026. The Volkswagen Group has developed and implemented a dedicated compliance management system for this regulation, and we are confident that we will achieve effective due diligence well before the effective dates.

Transparency and traceability

The Volkswagen Group has significantly enhanced supply chain traceability by integrating digital solutions such as AI-based tools and satellite geolocation data into risk management. In 2026, we will further expand these approaches and continue to work closely with suppliers and sub-suppliers, promoting the benefits of transparent supply chains while respecting competitively sensitive information.

Joint action in industry initiatives

In 2026, we will continue our work within industry associations to further harmonize risk analysis and mitigation measures. Especially in upstream supply chains, multiple overlapping audits and questionnaires can create bureaucracy without improving outcomes, so our focus will remain on cross-recognition of standards and audits.

We have contributed to the development of tools for the battery supply chain that can be applied across the industry, in particular Drive Sustainability's Battery SAQ and the Responsible Minerals Initiative's updated ESG Facility and RMAP+ assessments. Achieving broad industry rollout and acceptance of these tools will be a key priority in 2026.

Stakeholder engagement and social responsibility

The Volkswagen Group aims to continue its engagement in multi-stakeholder initiatives and on-the-ground projects to reduce human rights risks and improve social conditions in raw material supply chains. Our objective is to generate tangible benefits for local communities and workers in the relevant extraction and processing regions, for example through projects that strengthen education and community participation and develop additional livelihoods.

Positive impact

As one of the world's largest automotive manufacturers, the Volkswagen Group acknowledges its particular responsibility toward its partners, stakeholders and society. In 2026 and beyond, we will continue to take responsible raw material sourcing very seriously, further develop our due diligence systems and learn from experience. Our goal remains to achieve measurable positive results for human rights and the environment, step by step and year by year.

We provide an in-depth outlook for 2026 for our 18 priority raw materials in → Section 04 of this report.

06

Annex

Annex I: List of Abbreviations

3TG	tin, tantalum, tungsten and gold
AHSS	Advanced High Strength Steels
AI	artificial intelligence
ARM	Alliance for Responsible Mining
ASI	Aluminium Stewardship Initiative
ASM	artisanal and small-scale mining
BEV	battery electric vehice
BRGM	Bureau de recherches géologiques et minières
BSAQ	Battery Self Assessment Questionnaire
C4D	Cobalt for Development
CAHRAs	Conflict-affected and high-risk areas
CAP	corrective action plan
CASCADE	Committed Actions for Smallholders Capacity Development
CCCMC	China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters
CMRT	Conflict Minerals Reporting Template
CoC BP	Code of Conduct for Business Partners
CoC Standard	Chain of Custody Standard
CRMA	Critical Raw Materials Act
CSO	civil society organization
CSR	Corporate Social Responsibility
DERA	German Raw Materials Agency
DLE	Direct Lithium Extraction
DRC	Democratic Republic of the Congo
EU	European Union
EUBR	EU Regulation concerning batteries and waste batteries (EU Battery Regulation)
EUDR	EU Deforestation Regulation
ESG	environmental, social and governance
ESRS	European Sustainability Reporting Standards
EV	electric vehicle
FAO	Food and Agriculture Organization of the United Nations
FAS USDA	Foreign Agricultural Service United States Department of Agriculture
FPIC	Free, Prior, and Informed Consent
GCMRI	Global Critical Metals Research Institute
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit (German Agency for International Cooperation)
GPSNR	Global Platform for Sustainable Natural Rubber
HPAL	High-Pressure Acid Leaching
HREE	heavy rare earth elements
ICE	internal combustion engine
iLiA	International Lithium Association
ILO	International Labour Organization
IMA	International Magnesium Association
IPA	International Platinum Group Metals Association
IRMA	Initiative for Responsible Mining Assurance
KPI	key performance indicator
LCD	liquid-crystal display
LkSG	Supply Chain Due Diligence Act

LPPM	London Platinum and Palladium Market
LREE	light rare earth elements
LSM	largescale mining
LWG	Leather Working Group
MDA	Mineworkers Development Agency
MHP	mixed hydroxide precipitate
MSP	mixed sulfate precipitate
NAP	National Action Plan
NIPI	Nickel Impact Programme Indonesia
NIR	International Council of Swedish Industry
NGO	non-governmental organization
NMC	Nickel-Manganese-Cobalt
OECD	Organisation for Economic Co-operation and Development
OECD-FAO	Food and Agriculture Organization
OEM	Original Equipment Manufacturier
PGM	platinum group metals
PPE	personal protective equipement
RBA	Responsible Business Alliance
REE	rare earth elements
ReSC System	Responsible Supply Chain System
RMAP	Responsible Minerals Assurance Process
RMDDMS	Raw Materials Due Diligence Management System
RMI	Responsible Minerals Initiative
SAQ	Sustainability Assessment Questionnaire
SCDDP	Supply Chain Due Diligence Plus
UFLPA	Uyghur Forced Labor Prevention Act
UN	United Nations
USGS	United States Geological Survey
VDA	Verband der Automobilindustrie (German Association of the Automotive Industry (VDA))
WWF	World Wide Fund for Nature

Annex II: List of Initiatives and Associations

- Aluminium Stewardship Initiative (ASI)
- CASCADE project
- Cobalt for Development (C4D)
- Drive Sustainability
- German Automotive Sector Dialogue
- Global Battery Alliance (GBA)
- Global Platform for Sustainable Natural Rubber (GPSNR)
- Initiative for Responsible Mining Assurance (IRMA)
- International Platinum Group Metals Association (IPA)
- Leather Working Group (LWG)
- Marikana Coalition
- Raw Material Working Group of the Verband der Automobilindustrie (VDA)
- Responsible Lithium Partnership
- Responsible Mica Initiative
- Responsible Minerals Initiative (RMI)
- Responsible Supply Chain Initiative (RSCI)
- Swedish Leadership for Sustainable Development
- Teknikföretagen (Association of Swedish Engineering Industries)
- The Copper Mark

Annex III: List of 3TG Smelters

Metal	Smelter name	RMI ID
Gold	8853 S.p.A.	CID002763
Gold	ABC Refinery Pty Ltd.	CID002920
Gold	Abington Reldan Metals, LLC	CID002708
Gold	Advanced Chemical Company	CID000015
Gold	African Gold Refinery	CID003185
Gold	Agosi AG	CID000035
Gold	Aida Chemical Industries Co., Ltd.	CID000019
Gold	Al Etihad Gold Refinery DMCC	CID002560
Gold	Albino Mountinho Lda.	CID002760
Gold	Alexy Metals	CID003500
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	Asahi Refining Canada Ltd.	CID000924
Gold	Asahi Refining USA Inc.	CID000920
Gold	Asaka Riken Co., Ltd.	CID000090
Gold	Attero Recycling Pvt Ltd	CID004697
Gold	AU Traders and Refiners	CID002850
Gold	Augmont Enterprises Private Limited	CID003461
Gold	Aurubis AG	CID000113
Gold	Aurubis AG, Hamburg	CID005476
Gold	Bangalore Refinery	CID002863
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	CID000128
Gold	Boliden Ronnskar	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	CGR Metalloys Pvt Ltd.	CID003382
Gold	Chimet S.p.A.	CID000233
Gold	Chugai Mining	CID000264
Gold	Coimpa Industrial LTDA	CID004010
Gold	Daye Non-Ferrous Metals Mining Ltd.	CID000343
Gold	Degussa Sonne / Mond Goldhandel GmbH	CID002867
Gold	Dijllah Gold Refinery FZC	CID003348
Gold	Dongwu Gold Group	CID003663
Gold	Dowa	CID000401
Gold	DSC (Do Sung Corporation)	CID000359
Gold	Eco-System Recycling Co., Ltd. East Plant	CID000425
Gold	Eco-System Recycling Co., Ltd. North Plant	CID003424
Gold	Eco-System Recycling Co., Ltd. West Plant	CID003425
Gold	Elite Industech Co., Ltd.	CID004755
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	Emirates Gold DMCC	CID002561
Gold	Fidelity Printers and Refiners Ltd.	CID002515
Gold	Fujairah Gold FZC	CID002584
Gold	Gasabo Gold Refinery Ltd	CID005006
Gold	GG Refinery Ltd.	CID004506
Gold	GGC Gujrat Gold Centre Pvt. Ltd.	CID002852
Gold	Gold by Gold Colombia	CID003641

Metal	Smelter name	RMI ID
Gold	Gold Coast Refinery	CID003186
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CID002243
Gold	Great Wall Precious Metals Co., Ltd. of CBPM	CID001909
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	CID000671
Gold	Heimerle + Meule GmbH	CID000694
Gold	Heraeus Germany GmbH Co. KG	CID000711
Gold	Heraeus Metals Hong Kong Ltd.	CID000707
Gold	Hunan Chenzhou Mining Co., Ltd.	CID000767
Gold	Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.	CID000773
Gold	HwaSeong CJ CO., LTD.	CID000778
Gold	Impala Platinum - Platinum Metals Refinery (PMR)	CID004714
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CID000801
Gold	International Precious Metal Refiners	CID002562
Gold	Ishifuku Metal Industry Co., Ltd.	CID000807
Gold	Istanbul Gold Refinery	CID000814
Gold	Italpreziosi	CID002765
Gold	JALAN & Company	CID002893
Gold	Japan Mint	CID000823
Gold	Jiangxi Copper Co., Ltd.	CID000855
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	CID000927
Gold	JSC Novosibirsk Refinery	CID000493
Gold	JSC Uralelectromed	CID000929
Gold	JX Nippon Mining & Metals Co., Ltd.	CID000937
Gold	K.A. Rasmussen	CID003497
Gold	Kazakhmys Smelting LLC	CID000956
Gold	Kazzinc	CID000957
Gold	Kennecott Utah Copper LLC	CID000969
Gold	KGHM Polska Miedz Spolka Akcyjna	CID002511
Gold	Kojima Chemicals Co., Ltd.	CID000981
Gold	Korea Zinc Co., Ltd.	CID002605
Gold	Kundan Care Products Ltd.	CID003463
Gold	Kyrgyzaltyn JSC	CID001029
Gold	Kyshtym Copper-Electrolytic Plant ZAO	CID002865
Gold	L'Orfebre S.A.	CID002762
Gold	Lingbao Gold Co., Ltd.	CID001056
Gold	LS MnM Inc.	CID001078
Gold	LT Metal Ltd.	CID000689
Gold	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	CID001093
Gold	Marsam Metals	CID002606
Gold	Materion	CID001113
Gold	Matsuda Sangyo Co., Ltd.	CID001119
Gold	MD Overseas	CID003548
Gold	Metal Concentrators SA (Pty) Ltd.	CID003575
Gold	Metallix Refining Inc.	CID003557
Gold	Metalor Technologies (Hong Kong) Ltd.	CID001149
Gold	Metalor Technologies (Singapore) Pte., Ltd.	CID001152
Gold	Metalor Technologies (Suzhou) Ltd.	CID001147
Gold	Metalor Technologies S.A.	CID001153
Gold	Metalor USA Refining Corporation	CID001157
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	CID001161
Gold	Minera Titán del Perú SRL (MTP) - Belen Plant	CID005014
Gold	Mitsubishi Materials Corporation	CID001188
Gold	Mitsui Mining and Smelting Co., Ltd.	CID001193
Gold	MKS PAMP SA	CID001352
Gold	MMTC-PAMP India Pvt., Ltd.	CID002509
Gold	Modeltech Sdn Bhd	CID002857
Gold	Morris and Watson	CID002282
Gold	Moscow Special Alloys Processing Plant	CID001204
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	CID001220
Gold	Navoi Mining and Metallurgical Combinat	CID001236

Metal	Smelter name	RMI ID
Gold	NH Recytech Company	CID003189
Gold	Nihon Material Co., Ltd.	CID001259
Gold	NOBLE METAL SERVICES	CID003690
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	CID002779
Gold	Ohura Precious Metal Industry Co., Ltd.	CID001325
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	CID001326
Gold	Pease & Curren	CID002872
Gold	Penglai Penggang Gold Industry Co., Ltd.	CID001362
Gold	Planta Recuperadora de Metales SpA	CID002919
Gold	Prioksky Plant of Non-Ferrous Metals	CID001386
Gold	PT Aneka Tambang (Persero) Tbk	CID001397
Gold	PX Precinox S.A.	CID001498
Gold	QG Refining, LLC	CID003324
Gold	Rand Refinery (Pty) Ltd.	CID001512
Gold	REMONDIS PMR B.V.	CID002582
Gold	Royal Canadian Mint	CID001534
Gold	SAAMP	CID002761
Gold	Sabin Metal Corp.	CID001546
Gold	Safimet S.p.A	CID002973
Gold	SAFINA A.S.	CID002290
Gold	Sam Precious Metals	CID003666
Gold	Samduck Precious Metals	CID001555
Gold	Samwon Metals Corp.	CID001562
Gold	SEMPSA Joyeria Plateria S.A.	CID001585
Gold	Shandong Gold Smelting Co., Ltd.	CID001916
Gold	Shandong Humon Smelting Co., Ltd.	CID002525
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	CID001619
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CID001622
Gold	Shenzhen CuiLu Gold Co., Ltd.	CID002750
Gold	SHENZHEN JINJUNWEI RESOURCE COMPREHENSIVE DEVELOPMENT CO., LTD.	CID004435
Gold	Shenzhen Zhonghenglong Real Industry Co., Ltd.	CID002527
Gold	Shirpur Gold Refinery Ltd.	CID002588
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CID001736
Gold	Singway Technology Co., Ltd.	CID002516
Gold	Smelter Not Listed	CID004704
Gold	Smelter Not Listed	CID004705
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	CID001756
Gold	Solar Applied Materials Technology Corp.	CID001761
Gold	Sovereign Metals	CID003383
Gold	State Research Institute Center for Physical Sciences and Technology	CID003153
Gold	Sumitomo Metal Mining Co., Ltd.	CID001798
Gold	SungEel HiMetal Co., Ltd.	CID002918
Gold	Super Dragon Technology Co., Ltd.	CID001810
Gold	T.C.A S.p.A	CID002580
Gold	Tanaka Kikinzoku Kogyo K.K.	CID001875
Gold	TITAN COMPANY LIMITED, JEWELLERY DIVISION	CID004491
Gold	Tokuriki Honten Co., Ltd.	CID001938
Gold	Tongling Nonferrous Metals Group Co., Ltd.	CID001947
Gold	TOO Tau-Ken-Altyn	CID002615
Gold	Torecom	CID001955
Gold	Umicore Precious Metals Thailand	CID002314
Gold	Umicore S.A. Business Unit Precious Metals Refining	CID001980
Gold	United Precious Metal Refining, Inc.	CID001993
Gold	Valcambi S.A.	CID002003
Gold	WEEEREFINING	CID003615
Gold	Western Australian Mint (T/a The Perth Mint)	CID002030
Gold	WIELAND Edelmetalle GmbH	CID002778

Metal	Smelter name	RMI ID
Gold	Yamakin Co., Ltd.	CID002100
Gold	Yokohama Metal Co., Ltd.	CID002129
Gold	Yunnan Copper Industry Co., Ltd.	CID000197
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CID002224
Tantalum	5D Production OU	CID003926
Tantalum	AMG Brasil	CID001076
Tantalum	D Block Metals, LLC	CID002504
Tantalum	F&X Electro-Materials Ltd.	CID000460
Tantalum	FIR Metals & Resource Ltd.	CID002505
Tantalum	Global Advanced Metals Aizu	CID002558
Tantalum	Global Advanced Metals Boyertown	CID002557
Tantalum	Guangdong Rising Rare Metals-EO Materials Ltd.	CID000291
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CID002492
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CID002512
Tantalum	Jiangxi Sanshi Nonferrous Metals Co., Ltd	CID004813
Tantalum	Jiangxi Tuohong New Raw Material	CID002842
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CID000914
Tantalum	Jiujiang Tanbre Co., Ltd.	CID000917
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CID002506
Tantalum	KEMET de Mexico	CID002539
Tantalum	Materion Newton Inc.	CID002548
Tantalum	Metallurgical Products India Pvt., Ltd.	CID001163
Tantalum	Mineracao Taboca S.A.	CID001175
Tantalum	Mitsui Mining and Smelting Co., Ltd.	CID001192
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CID001277
Tantalum	NPM Silmet AS	CID001200
Tantalum	PowerX Ltd.	CID004054
Tantalum	Resind Industria e Comercio Ltda.	CID002707
Tantalum	Smelter Not Listed	CID002508
Tantalum	Solikamsk Magnesium Works OAO	CID001769
Tantalum	Taki Chemical Co., Ltd.	CID001869
Tantalum	TANIOBIS Co., Ltd.	CID002544
Tantalum	TANIOBIS GmbH	CID002545
Tantalum	TANIOBIS Japan Co., Ltd.	CID002549
Tantalum	TANIOBIS Smelting GmbH & Co. KG	CID002550
Tantalum	Telex Metals	CID001891
Tantalum	Ulba Metallurgical Plant JSC	CID001969
Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CID000616
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CID001522
Tin	Alpha	CID000292
Tin	An Vinh Joint Stock Mineral Processing Company	CID002703
Tin	Aurubis Beerse	CID002773
Tin	Aurubis Berango	CID002774
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CID000228
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CID003190
Tin	China Tin Group Co., Ltd.	CID001070
Tin	Conecsus LLC	CID003504
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	CID003486
Tin	CRM Synergies	CID003524
Tin	Dongguan Best Alloys Co., Ltd.	CID000377
Tin	Dongguan CiEXPO Environmental Engineering Co., Ltd.	CID003356
Tin	Dowa	CID000402
Tin	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	CID002572
Tin	EM Vinto	CID000438
Tin	Estanho de Rondonia S.A.	CID000448
Tin	Fabrica Auricchio Industria e Comercio Ltda.	CID003582
Tin	Fenix Metals	CID000468
Tin	Gejiu City Fuxiang Industry and Trade Co., Ltd.	CID003410

Metal	Smelter name	RMI ID
Tin	Gejiu Kai Meng Industry and Trade LLC	CID000942
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CID000538
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CID001908
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CID000555
Tin	Global Advanced Metals Greenbushes Pty Ltd.	CID004754
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CID003116
Tin	Jiangxi New Nanshan Technology Ltd.	CID001231
Tin	Longnan Chuangyue Environmental Protection Technology Development Co., Ltd	CID004796
Tin	Luna Smelter, Ltd.	CID003387
Tin	Ma'anshan Weitai Tin Co., Ltd.	CID003379
Tin	Magnu's Minerais Metais e Ligas Ltda.	CID002468
Tin	Malaysia Smelting Corporation Berhad (Port Klang)	CID004434
Tin	Melt Metais e Ligas S.A.	CID002500
Tin	Metallic Resources, Inc.	CID001142
Tin	Mineracao Taboca S.A.	CID001173
Tin	Mining Minerals Resources SARL	CID004065
Tin	Minsur	CID001182
Tin	Mitsubishi Materials Corporation	CID001191
Tin	Modeltech Sdn Bhd	CID002858
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	CID002573
Tin	Novosibirsk Tin Combine	CID001305
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	CID001314
Tin	O.M. Manufacturing Philippines, Inc.	CID002517
Tin	Operaciones Metalurgicas S.A.	CID001337
Tin	P Kay Metal, Inc	CID005189
Tin	Precious Minerals and Smelting Limited	CID003409
Tin	PT ATD Makmur Mandiri Jaya	CID002503
Tin	PT Cipta Persada Mulia	CID002696
Tin	PT Mitra Stania Prima	CID001453
Tin	PT Mitra Sukses Globalindo	CID003449
Tin	PT Prima Timah Utama	CID001458
Tin	PT Putera Sarana Shakti (PT PSS)	CID003868
Tin	PT Rajehan Ariq	CID002593
Tin	PT Timah Tbk Kundur	CID001477
Tin	PT Timah Tbk Mentok	CID001482
Tin	Resind Industria e Comercio Ltda.	CID002706
Tin	RIKAYAA GREENTECH PRIVATE LIMITED	CID004692
Tin	Rui Da Hung	CID001539
Tin	Smelter Not Listed	CID001399
Tin	Smelter Not Listed	CID000309
Tin	Smelter Not Listed	CID003380
Tin	Smelter Not Listed	CID002570
Tin	Super Ligas	CID002756
Tin	Takehara PVD Materials Plant / PVD Materials Division of MITSUI MINING & SMELTING CO., LTD.	CID004403
Tin	Thaisarco	CID001898
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CID002180
Tin	Tin Technology & Refining	CID003325
Tin	VQB Mineral and Trading Group JSC	CID002015
Tin	White Solder Metalurgia e Mineracao Ltda.	CID002036
Tin	Woodcross Smelting Company Limited	CID004724
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CID002158
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CID003397
Tungsten	A.L.M.T. Corp.	CID000004
Tungsten	Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.	CID003427
Tungsten	Asia Tungsten Products Vietnam Ltd.	CID002502
Tungsten	China Molybdenum Tungsten Co., Ltd.	CID002641

Metal	Smelter name	RMI ID
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CID000258
Tungsten	Cronimet Brasil Ltda	CID003468
Tungsten	Fujian Xinlu Tungsten Co., Ltd.	CID003609
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CID002315
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CID002494
Tungsten	Global Tungsten & Powders LLC	CID000568
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CID000218
Tungsten	H.C. Starck Tungsten GmbH	CID002541
Tungsten	Hubei Green Tungsten Co., Ltd.	CID003417
Tungsten	Hunan Jintai New Material Co., Ltd.	CID000769
Tungsten	Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch	CID002513
Tungsten	Hydrometallurg, JSC	CID002649
Tungsten	Japan New Metals Co., Ltd.	CID000825
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CID002551
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CID002321
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	CID002313
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CID002317
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CID002316
Tungsten	Jing Yuan Tungsten Technology Co., Ltd.	CID005012
Tungsten	JSC "Kirovgrad Hard Alloys Plant"	CID003408
Tungsten	Kenee Mining Corporation Vietnam	CID004619
Tungsten	Kennametal Fallon	CID000966
Tungsten	Kennametal Huntsville	CID000105
Tungsten	Lianyou Metals Co., Ltd.	CID003407
Tungsten	Lianyou Resources Co., Ltd.	CID004397
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CID002319
Tungsten	Masan High-Tech Materials	CID002543
Tungsten	Moliren Ltd.	CID002845
Tungsten	Nam Viet Cromit Joint Stock Company	CID004034
Tungsten	Niagara Refining LLC	CID002589
Tungsten	NPP Tyazhmetprom LLC	CID003416
Tungsten	OOO "Technolom" 1	CID003614
Tungsten	OOO "Technolom" 2	CID003612
Tungsten	Philippine Bonway Manufacturing Industrial Corporation	CID004797
Tungsten	Philippine Carreytech Metal Corp.	CID004438
Tungsten	S.P.T. spol.s r.o.	CID005068
Tungsten	Shinwon Tungsten (Fujian Shanghang) Co., Ltd.	CID004430
Tungsten	Smelter Not Listed	CID002660
Tungsten	TANIOBIS Smelting GmbH & Co. KG	CID002542
Tungsten	Tungamoy Metals Inc.	CID005248
Tungsten	Tungsten Vietnam Joint Stock Company	CID003993
Tungsten	Unecha Refractory metals plant	CID002724
Tungsten	Wolfram Bergbau und Hutten AG	CID002044
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CID002320
Tungsten	Xiamen Tungsten Co., Ltd.	CID002082
Tungsten	YUDU ANSHENG TUNGSTEN CO., LTD.	CID003662

Annex IV: List of 3TG Countries and territories of origin

Albania
Andorra
Angola
Argentina
Armenia
Australia
Austria
Azerbaijan
Belarus
Belgium
Benin
Bermuda
Bolivia
Botswana
Brazil
Bulgaria
Burkina Faso
Burundi
Cambodia
Canada
Central African Republic
Chile
China
Colombia
Congo
Cyprus
Democratic Republic of Congo
Djibouti
Dominica
Dominican Republic
Ecuador
Egypt
El Salvador
Eritrea
Estonia
Ethiopia
Fiji
Finland
France
Georgia
Germany
Ghana
Guatemala
Guinea
Guyana
Honduras
Hong Kong
Hungary
India
Indonesia
Ireland
Israel
Italy
Japan
Jersey
Kazakhstan
Kenya
Korea
Kyrgyzstan
Liberia
Liechtenstein
Lithuania
Luxembourg
Madagascar
Malaysia
Mali
Mauritania
Mexico
Mongolia
Morocco
Mozambique
Myanmar
Namibia
Netherlands
New Zealand
Nicaragua
Niger
Nigeria
Norway
Oman
Panama
Papua New Guinea
Peru
Philippines
Poland
Portugal
Russian Federation
Rwanda
Saudi Arabia
Senegal
Serbia
Sierra Leone
Singapore
Slovakia
Solomon Islands
South Africa
South Sudan
Spain
Sudan
Suriname
Sweden
Switzerland
Taiwan
Tajikistan
Tanzania
Thailand
Turkey
Uganda
United Arab Emirates
United Kingdom
United States of America
Uruguay
Uzbekistan
Vietnam
Zambia
Zimbabwe

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Published by
Volkswagen AG
Sustainability Management Procurement
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Germany

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Main Editing
Volkswagen AG

Concept, Design, Editing and Realization
Kirchhoff Consult GmbH

Image Sources
Volkswagen Group and its Group brands
Responsible Mica Initiative
Ksapa
Setara Jambi
Getty Images Deutschland GmbH
Shutterstock, Inc.

Publication
March 2026

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The English version of the Responsible Raw Materials Report is binding.

Your Feedback
In the interests of improving and advancing our commitment to sustainability, we would be delighted to receive your feedback on our Responsible Raw Materials Report 2025. You can send us your views directly online using the email address on the left.

VOLKSWAGEN GROUP