Responsible Raw Materials Policy

Publication Note

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PREAMBLE

VALUES AND PURPOSE

The Volkswagen Group is committed to responsible and transparent business conduct.

It is our vision to shape mobility for present and future generations. Respecting human rights, protecting the environment, and conducting business ethically and lawfully guide our conduct – all topics being particularly relevant in our raw material supply chains.

We are aware that we have a significant direct and indirect impact on the environment, society, local communities and workers around the globe. Therefore, we take our responsibility for human rights due diligence and environmental protection very seriously. We believe that prolonging success and responsible business conduct is reciprocal. We comply with regulatory requirements and act in accordance with our voluntary commitments, as well as our corporate standards and objectives.

Our detailed expectations towards our business partners are expressed in the Volkswagen Code of Conduct for Business Partners. The purpose of this Responsible Raw Materials Policy is the clear communication of our goals and expectations regarding supply chains and our commitment to implement these expectations and fulfill regulatory requirements. This includes but is not limited to raw materials in the following categories: metals and minerals, agricultural raw materials and battery raw materials, such as lithium, nickel, cobalt and natural graphite.

CHALLENGES AND JOINT EFFORT

We, as Volkswagen Group, work with our business partners to build responsible raw material supply chains, guided by the due diligence, obligations and international frameworks set out in this policy. We strongly believe that human rights due diligence and environmental protection in our raw material supply chains can be improved only by building responsible supply chains, and through continuous collaboration as well as a shared vision with our business partners along the supply chains. In this policy,

"responsible" refers to the application of the due diligence requirements set out herein and does not imply that our supply chains are free of adverse impacts.

Our raw material supply chains are complex. The highest potential sustainability risks often occurring at raw material origin, which can be up to nine or more tiers away from our direct suppliers. Therefore, we can only address and successfully mitigate sustainability risks together with relevant stakeholders and business partners along with the raw materials supply chain. We therefore participate in industry collaboration on human rights, environmental and responsible-sourcing topics in relevant industry groups like the Drive Sustainability Initiative, the Initiative for Responsible Mining Assurance (IRMA), the Responsible Minerals Initiative (RMI), the Global Platform for Sustainable Natural Rubber (GPSNR), the Responsible Mica Initiative, the Aluminum Stewardship Initiative (ASI), the Veramark Assurance or the Leather Working Group (LWG).

OUR COMMITMENT

The Volkswagen Group is committed to respect international frameworks and guidelines such as the 10 Principles of the United Nations (UN) Global Compact, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multi National Enterprises, the OECD Due Diligence Guidance for Responsible Business Conduct; the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas, the OECD-FAO Guidance for Responsible Agricultural Supply Chains, the Fundamental Conventions of the International Labor Organization (ILO), in particular as laid out in the ILO Declaration on Fundamental Principles and Rights at Work, the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, the Universal Declaration of Human Rights (UDHR), codified in the International Covenant on Civil and Political Rights and in the International Covenant on Economic, Social and Cultural Rights, the UNEP Guidelines for Social Life Cycle Assessment of Products, and the Guiding Principles of the Drive Sustainability Initiative.

ENVIRONMENTAL PROTECTION AND USE OF NATURAL RESOURCES

1. The Volkswagen Group aligns its climate action with recognized international frameworks, taking into account the requirements of the Paris Climate Agreement. Our decarbonisation targets and measures to achieve them are set out in the Volkswagen Group Annual Report 2025 (Group Sustainability Report, chapter "Climate Change"). We take appropriate and adequate steps to measure and to reduce our greenhouse gas emissions along our raw materials supply chains, where feasible. We promote measures to ensure energy efficiency as well as the usage of renewable energy. Furthermore, we encourage establishing recycling loops – both internally and with our

partners – including the increased usage of recycled materials to reduce environmental impacts along our raw material supply chains.

2. For relevant commodities and products within the scope of Regulation (EU) 2023/1115 (EUDR), we comply with the applicable legal requirements. Beyond this scope, we expect our business partners to avoid deforestation, land degradation and the destruction of critical wildlife habitats and natural ecosystems, especially in key biodiversity areas, and we take appropriate and adequate measures where such risks are identified in our raw materials supply chains. We are guided by the objectives of international biodiversity frameworks, such as the Convention on Biological Diversity and the IUCN Resolutions and Recommendations on Biodiversity. We address animal welfare in our raw material supply chains, including through our participation in the Leather Working Group (LWG).

3. We support the objectives of the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants (POPs), and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal. We require our business partners to act in conformity with these conventions and the related applicable implementing legislation at national and supranational level. We take appropriate and adequate measures to minimize pollution of land, soil, air and water, including the recycling of resources. We do not accept the unsafe storage or disposal of hazardous and non-hazardous waste and residues, the use of toxic substances in violation of applicable law or without adequate safeguards, or activities that significantly contribute to soil erosion

We are committed to taking appropriate and adequate measures to minimize water consumption along our supply chains with prioritization for water stressed regions. This includes but is not limited to reducing freshwater consumption and recycling water with responsible and effective treatment of wastewater discharges to minimize water pollution and protect the environment. The right to water must be respected at all times. This includes access to safe, sufficient and acceptable water sources. To protect seabed and marine environments, we take appropriate and adequate measures to exclude any raw materials linked to deep sea mining from our supply ways respected from financing deep seabed mining activities as a matter of precaution until the risks and impacts of this matter are comprehensively investigated.

HUMAN RIGHTS AND WORKING CONDITIONS

4. We neither tolerate nor intend to benefit from human rights violations and abuses in our raw materials supply chains and take appropriate and adequate measures where such violations are identified. We explicitly oppose:

- a. Any forms of torture, corporal punishment or cruel, inhumane and degrading treatment;
- b. Any forms of modern slavery such as human trafficking, forced or compulsory labour, which means work or service which is extracted from any person under the menace of penalty, intimidation, threat of being disadvantaged (e. g. debt slavery or involuntary prison labour) and for which said person has not offered himself voluntarily;
- c. Any forms of child labour, including the worst forms of child labour;
- d. War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide

5. We do not accept any form of discrimination, intimidation, harassment, sexual violence or unwarranted disadvantages, including against vulnerable groups. We recognize the principle of equal pay for work of equal value, especially between different genders.

6. We respect legitimate tenure right holders and their public, private, communal, collective, indigenous and customary rights over natural resources, including land, fisheries, forests, and water. We do not tolerate the unlawful deprivation of land.

7. We do not accept threats to indigenous peoples' rights and communities. We seek to support the ability of Indigenous Peoples and local communities (IPLCs) to give or withhold their free, prior, and informed consent (FPIC) on activities that might affect their rights and aim to respect formal and customary land rights of IPLCs, guided by the UN Declaration on the Rights of Indigenous Peoples (UNDRIP).

8. We are committed to taking appropriate and adequate measures to prevent hazardous working conditions or poor occupational health and safety standards. We take appropriate and adequate measures to ensure the safety of plants and operating facilities. We aim to protect public health by neither tolerating nor intending to benefit from threats to human life, affected communities' health, and welfare in our operations, as well as threats deriving from the consumption, use or disposal of goods and services used for our products. We seek ways to reduce the negative impact of business activities on employees and local communities, including minimizing noise emissions and vibration.

9. We promote wages that are adequate to cover the basic needs of workers and their families and enable a decent standard of living (living wage). As a minimum, we expect our business partners to pay a reasonable wage, which is at least the minimum wage established under applicable law, and to comply with applicable requirements on overtime compensation, medical leave and government mandated benefits.

10. We are committed to the rights of all employees to freely form and join trade unions. We recognize the right to collective bargaining and the right of trade unions to be allowed to operate freely and in accordance with the law of the place of employment.

11. We seek ways to prevent and mitigate adverse human rights impacts that are linked to our raw materials supply chain where feasible even if we did not directly contribute to those impacts. We carry out human rights' due diligence as appropriate to the size, nature and context of our suppliers' operations and the severity of the risks.

PUBLIC AND PRIVATE SECURITY FORCES

12. We agree to eliminate direct or indirect support to public or private security forces who illegally control production sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or raw materials at point of access to production sites, along transportation routes or at points where raw materials are traded; or illegally tax or extort intermediaries, export companies or international traders.

13. We recognise that the role of public or private security forces at production sites, surrounding areas and along transportation routes should be solely to maintain the rule of law, including safeguarding human rights and providing security for workers, equipment and facilities. We promote that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights, if applicable

BUSINESS ETHICS & CORPORATE GOVERNANCE

14. We neither tolerate nor intend to benefit from any form of corruption, fraudulent practices or non-compliance with the tax laws and regulations of the countries in which our suppliers operate in our raw materials supply chains and take appropriate and adequate measures where such practices are identified.

15. We do not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of raw materials, to misrepresent taxes, fees and royalties paid to governments for the purposes of raw material production, trade, handling, transport and export in accordance with the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997) and the United Nations Convention Against Corruption (2004).

16. We support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the production, trade, handling, transport or export of raw materials derived from the illegal taxation or extortion of raw materials at points of access to production sites, along transportation routes or were traded by upstream suppliers.

17. We do not tolerate any direct or indirect support to non-state armed groups through production / extraction, transport, trade, handling or export of raw materials and will

suspend or discontinue engagement with suppliers where a reasonable risk of such support is identified.

DUE DILIGENCE, TRANSPARENCY & REPORTING

18. We take appropriate and adequate measures, including engagement with suppliers, government authorities, international organizations, civil society and affected third parties, as appropriate and reflective of the risk allocation along the supply chain, to prevent or mitigate risks of adverse impacts through measurable steps taken in reasonable timescales. Stakeholder input is considered and reflected in our due diligence activities.

19. We will promote risk-based mapping and traceability of raw materials in our supply chain. Upon request suppliers have to disclose their supply chain up to the material origin (including choke points such as smelters and refiners) and provide evidence of management systems or third-party verifications demonstrating processes that prevent or mitigate sustainability risks in the supply chain.

20. We commit to use and protecting all information in an appropriate manner and ensure that sensitive data is properly collected, processed, saved and deleted. We ensure we do not publish confidential content, to transmit it to third parties or make it available in any other form without necessary authorization.

21. In line with international best practice, we publicly report on the progress and results of due diligence activities of the Volkswagen Group.

CONFLICT MINERALS

Our approach to conflict minerals (gold, tin, tantalum and tungsten (collectively 3TG)) in our supply chains is guided by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the Responsible Minerals Assurance Process (RMAP). We expect our suppliers to avoid minerals from smelters and refiners that are not conformant with the RMAP or an equivalent assurance mechanism. However, the goal is not to ban procurement of conflict minerals or other products that originate in conflict-affected and high-risk areas, but to promote sourcing from responsible sources within those regions. The identification of the 3TG smelters and refineries used by our suppliers or sub-suppliers must be disclosed on a yearly basis. Following the best international practices we expect our suppliers to complete Conflict Mineral Reporting templates (CMRT). Besides the identification of smelter and refiners this template also allows us to determine the countries of origin of the mined material. Our suppliers are requested to only use raw materials from smelters or refiners that meet the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected

and High-Risk Areas. The conformance to this guidance is assessed by the Responsible Minerals Assurance Process (RMAP) of the Responsible Mineral Initiative ("RMI"). RMAP is an independent third-party assessment of smelter/refinery management systems and sourcing practices to validate conformance. To emphasize our commitment to responsible supply chains for conflict minerals the Volkswagen Group voluntarily publishes a CMRT to increase transparency.

OUR ACTIVITIES

OUR DUE DILIGENCE MANAGEMENT SYSTEM

To live up to our commitment to human rights due diligence, environmental protection and responsible raw material sourcing, our activities aim to identify and effectively address the risks in our supply chain. Recognizing that significant human rights and environmental risks potentially occur in the upstream supply chain and in raw material extraction, processing and production including farming, we have implemented a Raw Material Due Diligence Management System (RMDDMS), which strives to be in alignment with the OECD Due Diligence Guidance for Responsible Business Conduct, the OECD-FAO Guidance for Responsible Agricultural Supply Chains, and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Activities focus on our direct suppliers as well as our upstream supply chain (n-tier level). The steps entail risk identification and assessment, the development and implementation of risk mitigation measures, and both direct collaboration with suppliers as well as engagement in cross-industry groups and initiatives. We publicly report on our progress annually.

The management system and its procedures are overseen by a senior-level steering committee comprised of senior management of sustainability within procurement across all relevant entities of the Volkswagen Group, including the Head of Global Supplier Risk and Sustainability Management of Volkswagen Group Purchasing.

MISCONDUCT AND GRIEVANCE

Potential violations of the Code of Conduct for Business Partners by suppliers, including serious risks and violations of human rights and environment by direct and indirect suppliers are processed with our "Supply Chain Grievance Mechanism". The corresponding channel is accessible to all stakeholders along the supply chain and potentially affected persons as employees of suppliers, civil society organizations or representatives of communities in the immediate vicinity of production sites. The cases are handled according to a binding policy, managed by the Group and processed together with the relevant Volkswagen Group entities. If violations are identified,

measures are initiated without undue delay. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation and reserve the right to terminate ongoing business relationships.

REFERENCES

- Code of Conduct for Business Partners
- Code of Conduct for Business Partners of the Dr. Ing. h.c. F. Porsche AG
- Scania Supplier Code of Conduct (Version 2)
- Volkswagen Group Environmental and Energy Policy Statement
- Grundsatzerklärung Menschenrechte der AUDI AG
- Grundsatzerklärung der Dr. Ing. h.c. F. Porsche AG
- Grundsatzerklärung der Volkswagen AG
- Declaration of the Volkswagen Group on Social Rights, Industrial Relations and on Business and Human Rights
- Volkswagen Group Responsible Raw Materials Report
- Volkswagen Group Whistleblower System
- Volkswagen Group Sustainability in the Supply Chain