

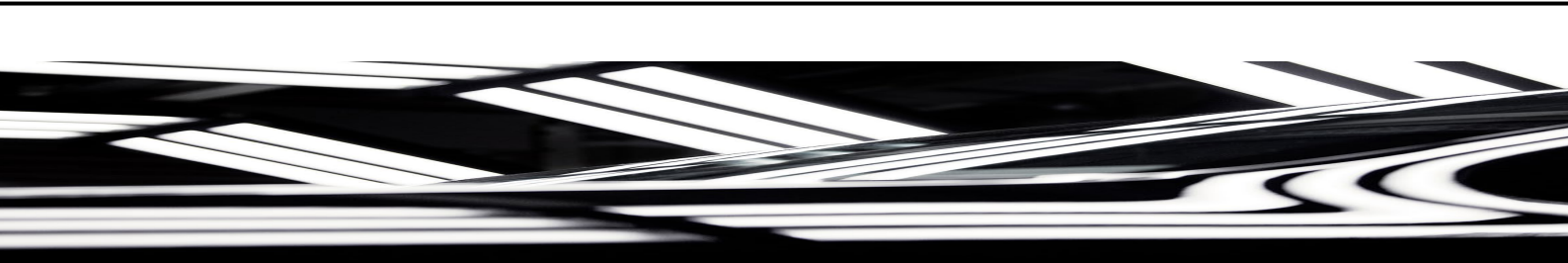


AUDI AG Slavery and Human Trafficking Statement (fiscal year 2025)

This statement has been prepared pursuant to Section 54 of the United Kingdom Modern Slavery Act 2015. It represents in particular the measures implemented by AUDI AG on preventing forms of modern slavery and human trafficking.

Preamble

We recognize our responsibility to protect human rights at our sites and along our complex value and supply chains. For us, this responsibility does not end at our factory gates, but goes beyond them.



Organization and supply chain

AUDI AG is a stock corporation under German law with its headquarters in Ingolstadt, Germany. In addition to AUDI AG, the Audi brand group comprises all the key companies and units in which AUDI AG has a direct or indirect controlling interest. The Audi brand group is organized in a decentralized manner, with individual subsidiaries bearing responsibility for their own business operations. Guidelines, reporting channels and committees are put in place to ensure appropriate Group steering and monitoring. Our business activities include the development, production and sale of vehicles and the corresponding services as well as management of the Audi brand group.

The Audi brand group is present in more than 100 markets worldwide. It manufactured at 23 sites in 14 countries in 2025 with their partner companies. The Audi brand group is also responsible for the Bentley, Ducati and Lamborghini brands. AUDI AG is a fully owned subsidiary of Volkswagen AG.

With its presence in key markets, the Audi global procurement organization ensures that materials and services in particular are procured and provided worldwide in the required quality and at the best possible terms. Audi¹ currently works with more than 12,300 suppliers in 59 countries. In order to maximize the benefit of synergy potential and achieve uniform standards, we select suppliers in close consultation with Volkswagen Group Procurement.

Compliance with recognized sustainability standards in areas such as human rights, occupational health and safety, environmental protection and combating corruption is a key expectation of our suppliers worldwide and an essential element of the Audi sustainability strategy.

Only together with our business partners is it possible to ensure compliance with sustainability standards and contribute to the implementation of the United Nations Sustainable Development Goals (SDGs). To achieve these goals, we implemented the concept of “Responsible Supply Chain Management” and we continue to build on and develop these measures to this day.

In addition to the independent activities undertaken in that area, all the actions taken and efforts made by the Volkswagen Group in promoting sustainability as well as in protecting and respecting human rights in the company and along the supply chain thus contribute to the attainment of these objectives at Audi as well.

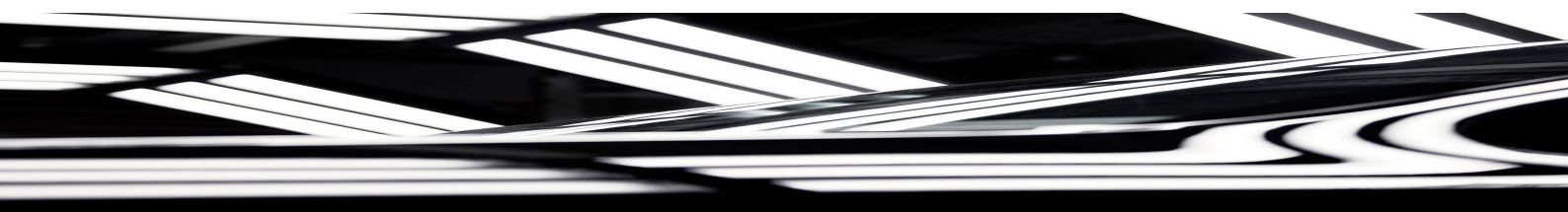
Management approach

The issue of “business and human rights” is built into the existing Compliance Management System (CMS). At Audi, the Integrity, Compliance, Risk Management department handles central coordination of and advice on “Business and Human Rights” matters for responsible persons in other Audi divisions, including the implementation of the German Supply Chain Due Diligence Act (LkSG) and the EU Corporate Sustainability Due Diligence Directive (CSDDD).

With effect from January 1, 2023 the Board of Management of AUDI AG appointed a [Human Rights Officer](#) for Audi. In this independent role they are the primary contact on all human rights matters for government agencies, the political sphere and society at large. Their primary tasks include monitoring the appropriateness and effectiveness of risk management to assure due diligence under the LkSG and conducting risk-based control measures. In this capacity they report directly to the Board of Management at AUDI AG.

Combating modern slavery along our value and supply chain is one of the focal points of our activities in the area of

¹ Global production sites of Audi vehicles.



“Business and Human Rights.” For us, child labor and forced labor in particular are serious violations of human rights and are therefore prohibited. We base our actions on the principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the requirements of the International Labour Organization (ILO).

We present our responsibility for “Business & Human Rights” on the [Audi website](#).² The Volkswagen Group has expanded and affirmed this understanding along with our commitment to our entrepreneurial responsibility, which follows internationally recognized treaties and conventions including explicitly the UN Guiding Principles on Business and Human Rights, in the “Declaration by the Volkswagen Group on social rights, industrial relations and business and human rights,” known as the [Social Charter](#). Audi has confirmed the Social Charter of the Volkswagen Group and adopted the values contained therein. On the subject of “No forced labor” it states:

“The Volkswagen Group rejects forced labor and all forms of modern slavery including human trafficking. This includes, in particular, work carried out involuntarily by people due to intimidation, penalty or threat of being disadvantaged (e.g. debt slavery or involuntary prison labor). Employment relationships are based on voluntary participation and can be terminated at any time by the employees of their own free will and within a reasonable period of notice.”³

In addition to coordination within our Group itself, we again prioritized one focal area in our collaboration with external

stakeholders in 2025. We support the German Federal government’s National Action Plan (NAP) “Business and Human Rights.” Within this context, we have actively participated in the [Sector Dialogue Automotive Industry](#) since 2020. One of its goals was the joint drafting of [implementation-led, industry-specific procedural instructions](#).⁴ Since July 2025, the [Sector Dialogue Automotive Industry](#) has operated under the umbrella of the UN Global Compact Network Germany e. V. (UN GCG)⁵. We will continue this dialogue with representatives of trade unions, NGOs, science, politics and business in 2026. Combating modern slavery and forced labor also plays an important role here.

We continue to proactively seek dialogue with external stakeholders⁶ on human rights and exchanges of views within working groups or initiatives such as the DICO working group “Human Rights in Business” or the Forum Compliance & Integrity. Audi deals intensively with human rights risks and challenges at various stages of the value chain.

In 2025, representatives from NGOs, science, business and associations engaged in a dialogue with Audi about how human rights work can be effectively organized even in times of economic challenges and decreasing regulatory requirements. The goal was to develop jointly supported approaches.

As part of the local initiative, Audi México conducted its own stakeholder dialogue together with the Human Rights Officer of the Audi brand group, which focused on local human rights challenges. Regional risks were identified and fields of action established in cooperation with the German Embassy, NGOs, suppliers and trade unions.

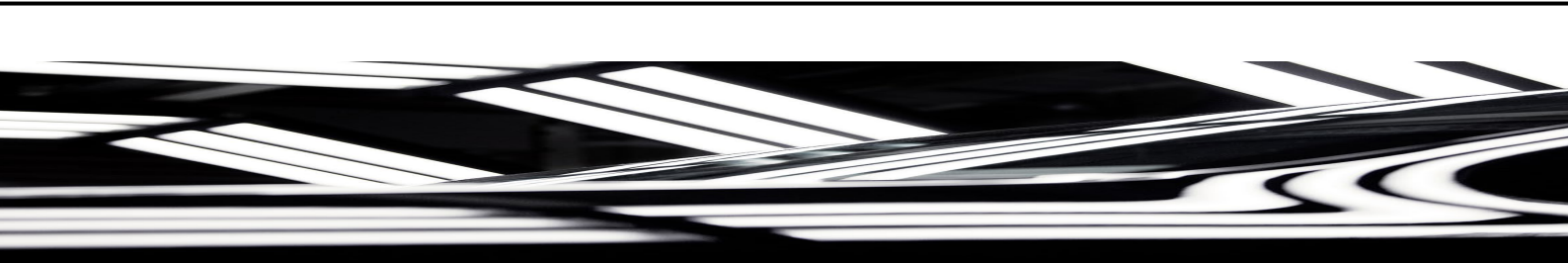
² <https://www.audi.com/en/sustainability/people-society/human-rights.html>

³ https://media.audi.com/is/content/audi/microsites/audi-com/assets/downloads/chartas/2021-07_VW_Social_Charter_Guidelines_Audi.pdf, page 6.

⁴ <https://www.globalcompact.de/en/media-library/publications/publication/guidelines-on-human-rights-due-diligence-sector-dialogue-automotive-industry>

⁵ <https://www.globalcompact.de/en/our-work/social/sector-dialogue-automotive-industry>

⁶ Further information: <https://www.audi.com/en/sustainability/sustainability-concept/stakeholder-management/>



Code of Conduct of the Audi brand group⁷

The Audi [Code of Conduct](#) represents the fundamental ethos and set of values that underpins ethical and compliant conduct within the Audi brand group. The Code of Conduct is regarded as a binding set of guidelines for all employees across all brands and companies – worldwide. It focuses on the compliant and ethical conduct of employees and on the responsibility of the company as a business partner and member of society. The Code of Conduct incorporates worldwide regulations to respect the protection of human and children's rights, a rejection of any child, forced and compulsory labor as well as all forms of modern slavery and human trafficking. The meaning and content of the Code of Conduct are communicated to employees as part of internal communication and a mandatory web-based training (WBT) module.

The Code of Conduct is permanently available to all employees on the intranet, and also to third parties over the Internet. Its receipt is confirmed when the employment contract is signed. The importance of the Code of Conduct is communicated proactively and systematically on an ongoing basis as part of central message management. For example, the Chairman of the Board of Management and the other Board members, representatives of top management and the Audi Chief Compliance Officer as well as managers at all hierarchical levels regularly declare their responsibility for compliance and integrity in and at internal and external publications and events. This regular dialogue communication provides an opportunity for open exchange throughout the company and communicates the importance of compliance and integrity to employees.

All employees with a permanent employment contract, managers and Board of Management members of AUDI AG receive training on the Code of Conduct every three years. The corresponding WBT is updated as necessary. This is part of a standard process within the Compliance Management System. Board of Management members and managers at senior management level or higher also receive Code of Conduct certification every two years. This additionally confirms the responsibility and role model function of this group of individuals in the context of the Code of Conduct.

The Volkswagen Group has moreover issued the Volkswagen [Code of Conduct for Business Partners](#), which has the status of a binding component of business partner contracts. It specifies the expectations of the Group regarding the approach and conduct of business partners, and especially suppliers and sales partners. These requirements regarding the entrepreneurial activities of business partners therefore also represent the basis for successful business relationships between Audi and its business partners.⁸

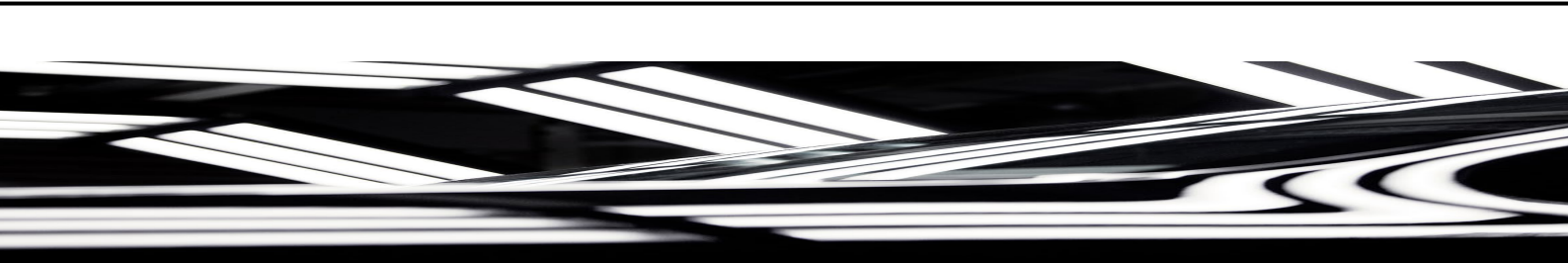
AUDI AG Statement of Principle on Respect for and Observance of Human Rights⁹

In order to affirm the commitment of AUDI AG to respecting and upholding human rights in general and condemning forced labor and human trafficking specifically, the AUDI AG Board of Management signed a "Statement of Principle on Respect for and Observance of Human Rights" in 2017. The [Statement of Principle](#) updated in 2025, which also contains the Audi human rights strategy, documents the commitment of AUDI AG to respecting and observing human rights.

⁷ https://emea-dam.audi.com/adobe/assets/urn:aaid:aem:eada764a-b9c3-4f83-a756-54ad9f62288d/original/as/Audi_CoC_3.1_EN.pdf

⁸ For further information on the Code of Conduct for Business Partners, please refer to page 7 under the section "Sustainability requirements of our suppliers: Code of Conduct for Business Partners."

⁹ The statement of principle is published on the [Audi website: https://emea-dam.audi.com/adobe/assets/urn:aaid:aem:2220aff3-d049-45c7-9fa5-15d2e94e5641/original/as/GE-Menschenrechte-4.0%20EN.pdf](https://emea-dam.audi.com/adobe/assets/urn:aaid:aem:2220aff3-d049-45c7-9fa5-15d2e94e5641/original/as/GE-Menschenrechte-4.0%20EN.pdf)



Audi brand group Whistleblower System¹⁰

The Whistleblower System is the point of contact for reporting suspected potential regulatory violations by employees. These include, for example, violations of human rights – a matter that fundamentally constitutes a “serious regulatory violation.” Wherever they are in the world, employees as well as business partners and customers are able to report misconduct by Audi brand group employees to the complaints procedure along a variety of channels. As well as via the e-mail mailbox and by traditional mail, regulatory violations can be reported 365 days a year in several different languages via a secure online reporting channel, using a telephone voice message and via the “Speak Up” app. There is also the option of reporting the violation personally or via an external lawyer (ombudsperson) appointed by the Volkswagen Group. If desired, reports can be made anonymously, especially where the online reporting channel is used (which allows for follow-up communication with the whistleblowers). Strict confidentiality and secrecy are maintained throughout the entire process. The Whistleblower System guarantees the highest possible protection for whistleblowers and all persons who participate in investigating and remedying misconduct and regulatory violations. Discrimination against whistleblowers and participating persons is fundamentally a “Serious regulatory violation” and is not tolerated. At the same time the Whistleblower System protects the interests of persons of interest. They are presumed innocent until proof of a violation is obtained. The processes involved in the Whistleblower System were reviewed in light of the requirements of LkSG and adjusted where necessary. A corresponding [Rules of Procedure](#) for the complaints procedure was published on the [Audi website](#).

Risk analysis

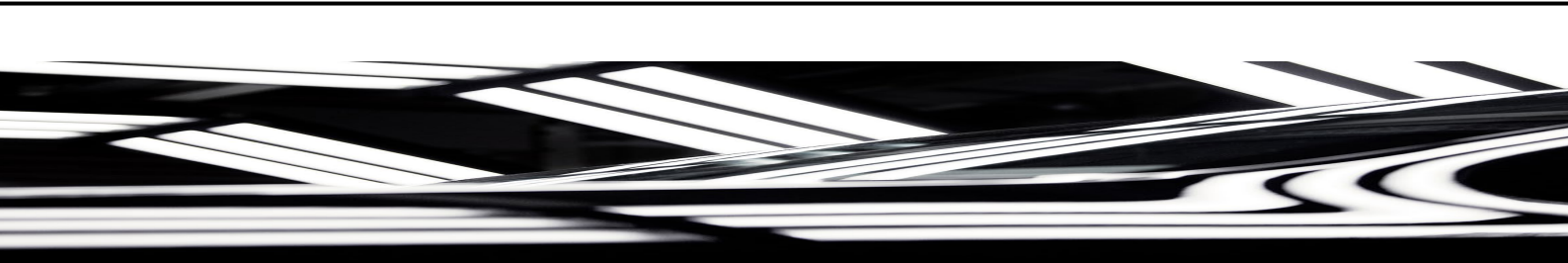
The established risk management processes within the Audi brand group cover both acute operating risks identified in the Risk Quarterly Process (RQP) and latent process-related risks identified by the standard Internal Control System (ICS). Risk assessments on the subject of human rights can be carried out by the divisions and companies in these processes. The countermeasures and control activities used are in addition reported on.

The standard ICS process lays down control requirements on compliance with legal and internal requirements on human rights and examines their effectiveness. The Boards of Management of AUDI AG and Volkswagen AG as well as the Audit Committee of AUDI AG receive reports both quarterly and annually as well as whenever required.

AUDI AG has incorporated business and human rights into the existing CMS, based on the United Nations requirements on corporate human rights due diligence. To identify human rights risks within the scope of business operations, risk exposures for controlled participations were already identified back in 2019 and the methodology adapted in the course of the Supply Chain Due Diligence Act (LkSG).¹¹ For the annual implementation, lessons learned from previous years are taken into account, and the process is continuously reviewed and adjusted. An abstract risk analysis was also carried out in 2025 at AUDI AG and the Audi brand group companies that are the focus of the “own business area” in accordance with the LkSG. To this end, the risk environment of the brand group companies was determined and categorized as low, medium or high.

¹⁰ <https://www.audi.com/en/company/compliance-integrity-riskmanagement/whistleblower-system/>

¹¹ For further information on the identification and management of risks as part of responsible supply chain management, please refer to page 6 onward.



This was based on a calculation of the following four risk factors: the country risk of the location, the business model, the number of employees and gross revenue. The risk environment serves the specialist functions as a guide for their concrete risk analysis. The concrete risk analysis was conducted, evaluated and prioritized by the specialist areas responsible for the legal positions, such as HR Compliance, Occupational Health and Safety, Corporate Security, Environmental Protection, Real Estate and Material Conformity. Where risks were identified, specific preventive measures were taken. The abstract and concrete risk analysis for the Audi brand group is conducted annually.

Training of employees

Within the CMS, compliance and integrity training represents a prevention measure in raising awareness of potential risks among employees and preventing violations. All training measures are examined annually as part of standardized processes, updated as necessary and continuously improved.

In fiscal year 2025, dedicated qualification measures on the subject of Business and Human Rights (BHR) again took place in a variety of formats and scopes, including as part of training on the Audi Code of Conduct. BHR aspects are also communicated during the onboarding of future compliance officers. Back in 2023, the Volkswagen Group developed a WBT module “Human Rights – Our Responsibility in the Volkswagen Group” and rolled it out across all Volkswagen Group companies. The Group-wide mandatory training, which is aimed at all employees, managers and Board members, teaches participants in the Audi brand group about their responsibility to uphold human rights,

raises their awareness of potential human rights and environmental risks and violations and enables them to identify and report them. Learning content on the subject of human rights was added to the “Audi Learning Experience” self-learning platform for employees in 2024.

In addition, the Volkswagen Group provides training for its business partners in Procurement and Sales on key matters of compliance and corruption prevention. For further information, please refer to the section “Training for employees and business partners” on page 9.

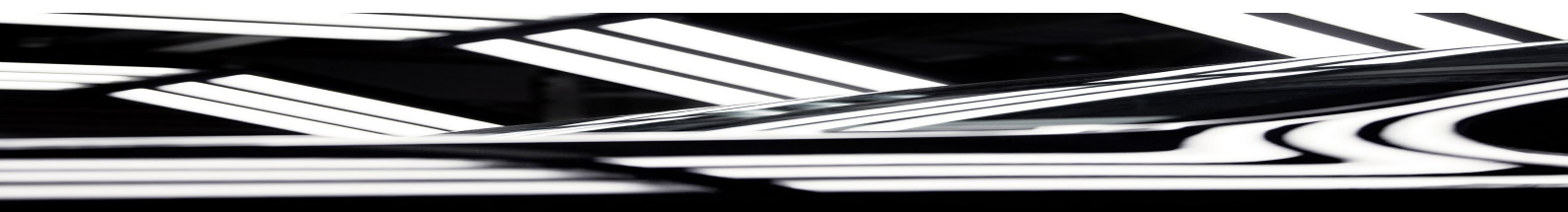
Measures along the supply chain

We at the Audi brand group, together with our more than 12,300¹² direct suppliers worldwide, have a major impact on the environment and society. At the same time, we assume responsibility along the value chain for fair and humane working conditions and integrate our partners into our activities so that we can meet this responsibility together. The development and implementation of a Responsible Supply Chain Management System are an integral component of our procurement processes. We have based our commitment in this area around three strategic focus topics: environment, people and innovation.

Human rights due diligence

In the 2025 reporting year, one focus was again on further systematizing the key topic of people and further developing the responsible supply chain management system. The aim of this approach is to avoid or minimize human rights or environmental risks along the Volkswagen Group supply chain, using a systematic risk analysis as the basis.

¹² The figure 12,300 refers to Audi. Unless otherwise indicated, the further quantitative information in this chapter refers to data from the Volkswagen Group, including Audi.



The purpose of the risk analysis is to identify risks in the Volkswagen Group supply chain. The analysis is carried out based on the business models of suppliers and takes external and internal data on human rights and environmental risks into consideration. Based on an assessment of the risks, suppliers are classified as a low, medium or high sustainability risk. Where suppliers achieve a low sustainability risk, a country risk score is also applied. If there is an elevated country risk for a supplier, it is moved to the medium risk category. Measures are allocated based on the risk analysis. The standard measures such as the Code of Conduct for Business Partners, the Supply Chain Grievance Mechanism (SCGM), the Sustainability Rating (S-Rating), media monitoring and training are described below.

Sustainability requirements for our suppliers: the Code of Conduct for Business Partners¹³

The “Volkswagen Group requirements regarding sustainability in its relationships with business partners” – the [Code of Conduct for Business Partners](#) – is the core element of our supplier management. It is a contractual component and fundamentally applies to partner companies of the Volkswagen Group. Our expectations of our business partners’ conduct with respect to environmental protection, human and labor rights, business ethics and sustainability requirements to ensure responsible supply chains are set out there. These requirements are based, among other things, on the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, and the relevant conventions of the International Labour Organization (ILO). The Code of Conduct for Business Partners is, however, not just based on international standards, but also on objectives, rules and policies of the Volkswagen Group.

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

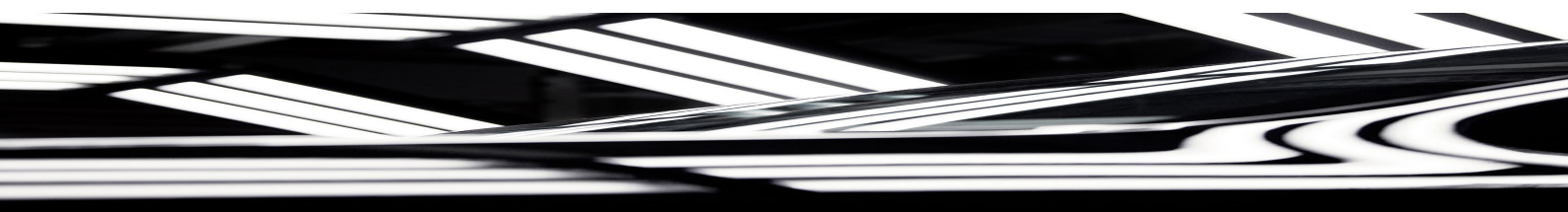
“No modern slavery, no human trafficking, no unethical recruitment | Business partners must take appropriate and adequate measures to eliminate debt bondage, forced and compulsory labor, as well as all forms of modern slavery and human trafficking in their own area of responsibility and/or along the supply chain. Business partners ensure that employment relationships are voluntary and allow employees to give notice of their own volition in observance of a reasonable notice period. Employees of business partners are given a contract at the time of hiring that complies with applicable law and is in a sufficiently documented form (e.g. written or electronic), is written in a language they understand and in which their rights and obligations are truthfully and clearly set out.

Furthermore, business partners must not mislead or defraud potential employees about the nature of the work, ask employees to pay recruitment fees or inappropriate transportation fees, and/or confiscate, destroy, conceal, and/or deny access to employee passports and other identity documents issued by government and/or restrict the employees’ freedom of movement or require employees to involuntarily use accommodation provided by the company for no operational reason.”¹⁴

Our goal, on the basis of the defined requirements, is to lay the foundation for enhanced sustainability and responsibility according to a risk-based approach and in a spirit of partnership together with our suppliers.

¹³ <https://emea-dam.audi.com/adobe/assets/urn:aaid:aem:da443bb0-53fb-465c-97a4-0f99f3284043/original/as/CoC%20fu%CC%88r%20Gescha%CC%88ftspartner%203.0.pdf>

¹⁴ Ibid, page 22.



We use a large number of channels for raising awareness among suppliers. These include the information on the [ONE.Group Business Platform](https://www.vwgroupsupply.com/one-kbp-public/en/kbp_public/homepage/homepage.html)¹⁵, the information on our [Audi website](http://www.s-rating.audi), the [S-Rating Information Hub](https://www.drivesustainability.org/)¹⁶ and supplier training opportunities.

Sustainability requirements as a criterion for awarding contracts

Our goal is to be aware of and effectively address the key sustainability risks in our supply chain. The Sustainability Rating (S-Rating) in the Volkswagen Group is a binding criterion for awarding contracts to suppliers of production materials as well as, risk-based, for relevant suppliers in General Procurement. Within the contract awarding process, the S-Rating is on a par with other important criteria such as cost, quality, technological expertise and logistics. It is generally based on a self-assessment questionnaire and is supplemented on the basis of risk by an on-site check (audit) at the supplier.

Following revision of the S-Rating in the 2025 reporting year, there are three possible rating results:

- A supplier with a positive result fulfills the requirements of the Volkswagen Group and is therefore eligible for being awarded contracts.
- If a supplier company does not fulfill the requirements, it receives a negative S-Rating and is fundamentally not eligible to be awarded a contract.
- If information required to assess the S-Rating is not available, the supplier is not eligible to be awarded a contract.

The basic requirement for an S-Rating as demonstration of eligibility for awarding new contracts provides a direct incentive for suppliers to comply with the Code of Conduct for Business Partners.

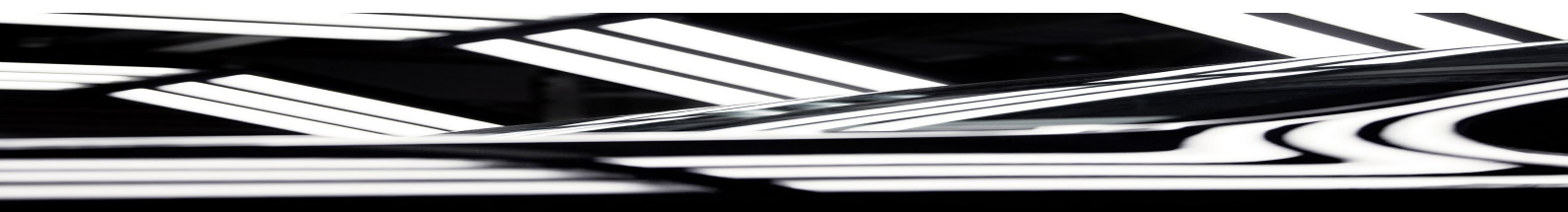
The rating is generally based on a self-assessment questionnaire (SAQ) – a standardized questionnaire that was developed together with several automotive partner companies as part of the Drive Sustainability¹⁷ initiative. It provides Audi with information about possible risks with regard to social and environmental aspects and corporate ethics at the respective suppliers. The information and documents in the SAQ are checked and validated by a service provider: If a supplier states that they have processes and policies in place, they must prove this with documents. Specifically, a question is asked regarding a human rights policy which includes the topics of “Forced or compulsory labor and human trafficking”. It is also identified whether there is a documented grievance mechanism in place. The aim is to identify shortcomings and encourage suppliers to improve by providing specific information. It is the suppliers’ responsibility to actively eliminate possible deviations from the required standards subsequently. Between the introduction of the S-Rating and the end of the reporting period, more than 20,900 direct suppliers of the Volkswagen Group had completed an SAQ. According to their feedback, 7,050 suppliers were able to improve their sustainability performance in the 2025 reporting year through targeted corrective actions.

On a risk basis, an on-site audit is conducted at the supplier – not only in respect of modern slavery, but also in terms of other aspects such as resource-friendly production and occupational safety.

¹⁵ https://www.vwgroupsupply.com/one-kbp-public/en/kbp_public/homepage/homepage.html

¹⁶ <http://www.s-rating.audi>

¹⁷ <https://www.drivesustainability.org/>



In 2025, 144 audits were conducted for the Volkswagen Group at selected suppliers within the scope of the S-Rating. Deviations are recorded in a Corrective Action Plan and measures initiated to correct them. Monitoring is subsequently conducted to ascertain whether the deficiencies identified by the sustainability assessor are actually being rectified. In addition, the S-Rating was linked more closely to the Supply Chain Grievance Mechanism and the Raw Materials Due Diligence Management System in the reporting year.

Supply Chain Grievance Mechanism

Another important element of sustainable supply chain management is our Supply Chain Grievance Mechanism, which we use in following up reports of possible violations of our sustainability requirements from the Code of Conduct for Business Partners. The channels of the Audi Whistleblower System can be accessed on the [Audi website](#) and are open to all potentially affected parties and stakeholders, such as employees of direct and indirect suppliers or members of civil society. The process for examining and processing reports is described uniformly in a binding policy, managed by the Volkswagen Group and implemented jointly with the brands and regions of the Volkswagen Group. In the event of serious violations suppliers are temporarily barred from being awarded new contracts and the business relationship may be terminated.

The process for addressing grievances concerning the supply chain is also linked to and governed by the process for the Audi Whistleblower System. During the reporting period, the Supply Chain Grievance Mechanism was used to process 180 reports of violations within the Volkswagen Group.

Media monitoring

Monitoring supply chains is an extremely complex undertaking. That makes it all the more important to understand the potential risks and make connections early on. Audi therefore adopts a risk monitoring approach that combines various methods and systems.

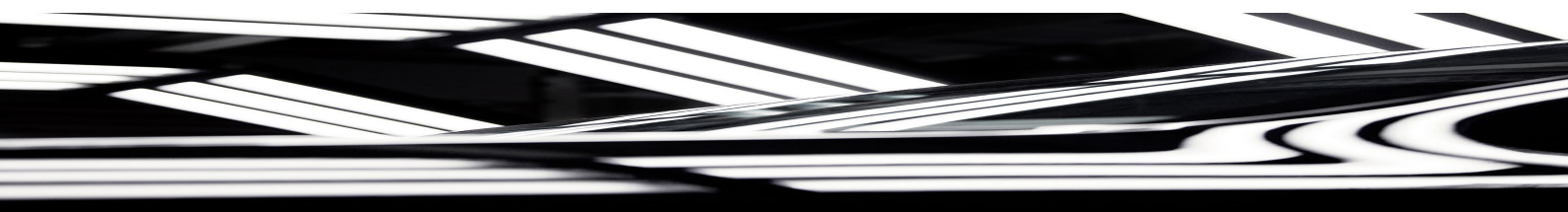
In addition to more traditional and reactive channels such as the grievance mechanism, Audi also uses digital tools for automated, proactive monitoring. In the course of media monitoring, we collect publicly accessible news from sources such as social media channels and local news media worldwide. The information is then automatically analyzed and consolidated. If the tool identifies indications of possible breaches of our Code of Conduct for Business Partners, these are reviewed and, if necessary, processed in the Supply Chain Grievance Mechanism.

Training for employees and business partners

The systematic training of our employees and suppliers is a key building block of our strategy. The tools we use to improve social and environmental standards in our supply chain include in particular the S-Rating, on which we train our employees and business partners at events and workshops. The [Audi Act4Impact](#)¹⁸ program provides a detailed overview of training measures. As part of this program, a theme week was organized in the 2025 reporting year, which brought together employees, suppliers and international partners.

To enable ongoing development of our suppliers, we also offer our suppliers subject-specific sustainability training and workshops together with the Volkswagen Group. In-depth human rights training for suppliers with an increased sustainability risk has also been available since 2020.

¹⁸ <https://www.audi.com/en/sustainability/people-society/responsibility-in-the-supply-chain/act4impact/>



The training covers such aspects as child labor, forced labor and discrimination. In the reporting period, more than 6,400 direct suppliers received training on sustainability within the Volkswagen Group.

Systematic approach to due diligence in the upstream supply chain

In addition to the standard measures designed to ensure a responsible supply chain, there are deep dive measures for both direct suppliers and upstream (n-tier) suppliers in the globally distributed supply chains. These deep dive measures include, in particular, the Human Rights Focus System (HRFS) and the Raw Materials Due Diligence Management System (RMDDMS).

Human Rights Focus System

The Human Rights Focus System (HRFS) is a specific management approach to identify systematic issues in the supply chain – by using internal data from the S-Rating, the SCGM or on-site audits, as well as by evaluating external information from studies and NGOs. It serves to pinpoint and address human rights and environmental risks that require more in-depth analysis. In the 2025 reporting year, AUDI AG worked together with Volkswagen on the focus topic of “living wages.” The Code of Conduct for Business Partners obliges suppliers to pay their employees an adequate wage, which is at least equal to the respective statutory minimum wage and ideally covers the basic needs of the employees and their families – including adequate food, accommodation, clothing as well as a steady improvement in living conditions. In the year under review, the data basis for calculating living wages was updated. This is used as a means of verifying the plausibility of supplier wage costs.

Measures taken in the year under review to promote fair working conditions included providing training for suppliers and engaging them in dialogue in order to provide a practical insight into the methodology and importance of a living wage. The

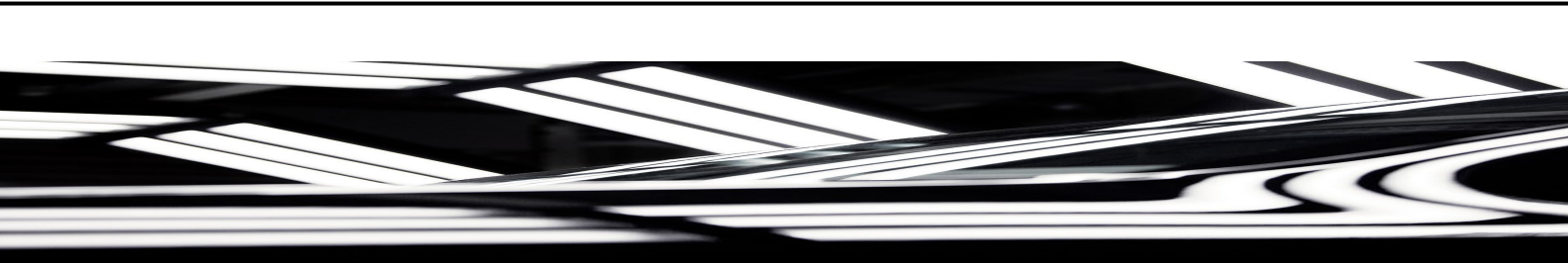
goal was to strengthen awareness of social sustainability and support implementation of minimum wage levels.

The basic approach to dealing with these focus topics always starts with a structured investigation of the causes, in order to develop and then implement corrective actions based on the results.

Raw Materials Due Diligence Management System

The Raw Material Due Diligence Management System (RMDDMS) is used to address human rights and environmental risks in raw material supply chains. Certain raw materials are extracted and processed under conditions that pose a particularly high risk of violating our sustainability standards, whether through discrimination or inadequate occupational safety precautions. The Volkswagen Group has identified 18 raw materials as being particularly risk-prone, including cobalt, copper and aluminum, and these are dealt with specifically in the RMDDMS. The due diligence process is based on the five steps of the “OECD Due Diligence Guidance for Responsible Business Conduct” and the requirements of the “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas” and risk-based audits are carried out at n-tier level.

Within the Volkswagen Group, AUDI AG bears responsibility for the raw materials aluminum and copper – and thus for analyzing the risks associated with these raw materials throughout the Group and for devising measures to minimize those risks. One example of implementation is the Aluminium Stewardship Initiative (ASI), which was formed from an alliance of various stakeholders in the aluminum industry. Its goal is to promote responsible extraction, processing and use of aluminum. Audi was the first car manufacturer worldwide to be certified for defined sites according to the “ASI Performance Standard” as well as the “ASI Chain of Custody Standard.”



Progress report

One priority again in 2025 was the implementation and further development of risk analyses of human-rights and environmental risks as well as the corresponding prevention measures for Audi brand group companies and our suppliers. The independent Human Rights Officer for the Audi brand group and their continuous audit activities to verify LkSG risk management represent another step towards meeting the requirements of LkSG. Further information on implementation can be found in the report on the fulfillment of LkSG due diligence obligations.¹⁹

As part of the Responsible Supply Chain Management System, the initiative to implement human rights due diligence has undergone further development since it started in 2021. In addition to the existing S-Rating, raw material-specific requirements regarding environmental and human rights risks were defined through specifications as criteria relevant to the awarding of contracts.

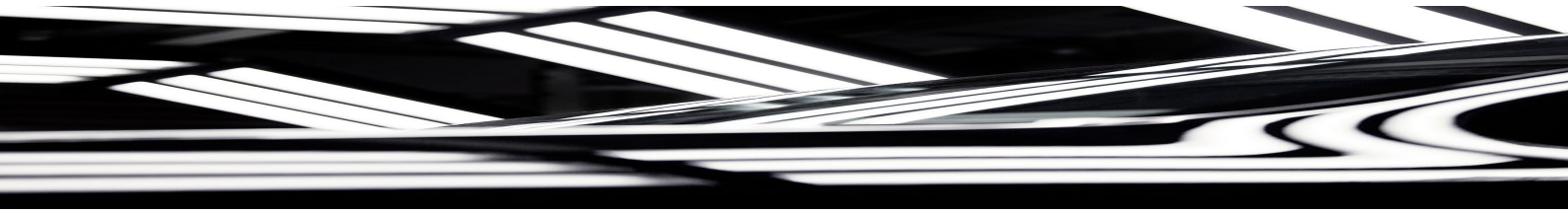
To further empower our supply chain, a theme week was organized in 2025 as part of the “Audi Act4Impact” program, bringing together around 1,400 participants from 25 countries. In addition to the circular economy, key focus topics included the implementation of human rights due diligence obligations and the establishment of effective grievance mechanisms.

As part of the Human Rights Focus System, the Volkswagen Group conducted risk-based, deep dive social standard audits at direct suppliers in 2025. The aim was to provide detailed transparency on the human rights situation at the supplier level and to specifically address any deviations identified. Suppliers found to be in violation are obliged to develop concrete action plans and demonstrate their implementation to independent auditors.

In particularly severe cases, Audi supplemented the audit measures with targeted supported services provided by external providers.

The current status, progress and targets of the RMDDMS were reported for fiscal year 2025 in the “[Responsible Raw Materials Report](#),” this report also details the company’s involvement in various industry initiatives, such as the ASI or The Copper Mark.

¹⁹ The AUDI AG report on LkSG according to the requirements of the Federal Office for Economic Affairs and Export Control can be viewed on the Audi website <https://www.audi.com/en/sustainability/ethical-leadership/documents-policies.html>.



AUDI AG

Ingolstadt, May 2026

Dr. Gernot Döllner

Chairman of the Board of Management of AUDI AG

Dieter Dehoorne

Member of the Board of Management of AUDI AG,
Procurement