

MODERN SLAVERY STATEMENT

For the year ended 31st December 2024

This statement is prepared in accordance with Section 54 of the Modern Slavery Act 2015, as enacted in the United Kingdom and will be updated annually. Statements relating to previous years can be found [here](#).

ORGANISATION

Bentley Motors Limited ("Bentley") manufactures some of the world's most sought after luxury cars. The company headquarters in Crewe, UK, is the hub of its operations including design, development and production of the company's product lines; Continental, Flying Spur, and Bentayga. The site in Crewe is also home to Mulliner where rare artisanal skills, modern sustainable design and cutting-edge engineering and innovation, produce personal commissions and low volume coachbuilt products such as Bacalar, Batur, Blower, and Speed Six Continuation Series. The company also retails Bentley branded merchandise. Bentley has been part of the Volkswagen Group ("VW") since 1998 and is part of the Brand Group Progressive with Audi, Lamborghini, Italdesign and Ducati.

Bentley recognises the importance of behaving ethically and responsibly to create a sustainable and fair environment for all stakeholders. This includes the establishment, preservation and continuous improvement of appropriate working conditions within the company, its suppliers and its business partners.

Bentley employs over 4,000 people and works with more than 400 third-party contractors. All recruitment processes include right-to-work checks and are designed to uphold ethical labour standards. In 2024, Bentley expanded its Early Careers Programme, receiving over 14,000 applications and increasing diversity in its talent pipeline.

With specific regard to the Modern Slavery Act, Bentley has a cross functional steering group which formally meet monthly or as is necessary. The steering group includes representation from Compliance, Legal, Purchasing, Human Resources, Security, Strategy, Government Relations & Sustainable Luxury, and Sales & Marketing. The working group is responsible for implementing and maintaining the relevant policies, controls, communication and training relating to business human rights risks, including Modern Slavery.

Bentley's approach to Modern Slavery is informed by ongoing stakeholder engagement. In 2024, over 500 stakeholders contributed to a refreshed materiality assessment. The Sustainability Council, comprising external experts, provides independent oversight and strategic guidance on human rights and ethical business practices.

In 2024, Bentley enhanced its supply chain transparency by implementing the Raw Materials Due Diligence Management System (RMDDMS), which sets clear expectations for suppliers regarding human rights and environmental standards. This system supports compliance with the German Supply Chain Due Diligence Act and anticipates future EU regulations. Bentley also improved traceability in its leather supply chain and is working toward full traceability to the farm level. You can read more about commitment to transparency and traceability in our Supply Chain in our **2024 Sustainability Report** available on our [website](#).

POLICIES

The Policy Management policy at Bentley outlines the governance framework and sets binding standards for Bentley Operating Policies (BOP). Human Resources and IT Policies are additional binding standards managed by their respective departments. All BOPs are approved by the CEO and must be reviewed every two years unless amendments are required sooner. Policies are published in English, and employees can access translations through a secure VW machine translation tool if needed.

Code of Conduct

All Bentley employees and its business partners are expected to adhere to our Code of Conduct. This code specifies the expected behaviours of all concerned with regard to ethical, social, environmental, and sustainability standards. For employees, the Code of Conduct provides a framework to enable us to meet regulatory requirements and is based on the VW Code of Conduct, which sets out the binding guidelines applicable to all employees of VW worldwide.

The VW 'Code of Conduct for Business Partners' defines our sustainability expectations towards suppliers, retailers and authorised repairers, and addresses human rights such as the strict avoidance of any kind of slavery, human trafficking, child labour or unjust discrimination. It specifically requires all business partners to act with integrity, and be vigilant against human rights abuses and the importance of raising any concerns to Bentley or VW. A copy of the Code of Conduct and the VW Code of Conduct for Business Partners are publicly available for download from the [Bentley Motors Corporate Website](#).

In 2024, Bentley renewed its ethical and values-based principles for acting with integrity; this included new principles surrounding business partners and ethical leadership.

Business Human Rights Policy

To address the continued risk of Modern Slavery and other business human rights violations, Bentley has a dedicated business operating policy, which is reviewed regularly to ensure that Bentley continues to adapt to the changing needs of the environment.

The policy informs Bentley colleagues about the issues of business human rights, raises awareness within the business and clarifies expectations regarding Modern Slavery.

As part of VW, Bentley aligns with the UN Guiding Principles on Business Human Rights which refer in particular to the Universal Declaration of Human Rights and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.

Particular legislation in the UK includes but is not limited to:-

- The Health and Safety at Work etc. Act 1974
- Trade Union Labour Relations (Consolidation) Act 1992
- Employment Rights Act 1996
- Human Rights Act 1998
- Immigration, Asylum & Nationality Act 2006
- Equality Act 2010
- Modern Slavery Act 2015
- Part-Time Workers (Prevention of Less Favourable Treatment) Regulations 2000 & Fixed-Term Employees (Prevention of Less Favourable Treatment) Regulations 2002.

From a European perspective, the German Supply Chain Due Diligence Act ("LkSG") 2023 is also directly applicable to Bentley's operations.

The Business Human Rights (BHR) policy refers to guidance on how to spot and report suspected breaches of human rights. It strongly encourages employees to raise any concern about a possible breach of human rights immediately and refers to the company Whistleblower System policy. Further information can be found [here](#).

In 2024, Bentley updated its BHR Policy to align with the German Supply Chain Due Diligence Act (LkSG), including the appointment of a human rights coordinator and enhanced risk management procedures.

The Whistleblower System.

Bentley has a Whistleblower System available on the Bentley website. The System enables all persons to report concerns to an external ombudsman. Concerns can be raised with anonymity if required.

Whistleblowers may raise concerns through a dedicated email address: whistleblower-office@audi.de. The Whistleblower System is also the reporting channel for all allegations regarding environmental and human rights violations in our business area and supply chains, in accordance with the LkSG. Since 2024, whistleblowers can report concerns via a new mobile app, alongside the website and telephone reporting channels.

Supplier Sustainability Standards

Bentley expects its Suppliers to comply with all applicable laws and regulations including but not limited to employment, environmental, and human rights, alongside the VW sustainability standards. These include:

- International Labour Organisation (ILO) core labour standards;
- the principles of the Global Compact, and the
- International Chamber of Commerce Business Charter for sustainable development.

The sustainability standards are publicly available for download on the [Volkswagen Group Supplier Portal](#) in eight (8) languages.

If a supplier is in breach of these requirements, the company reserves the right to terminate the relationship.

IDENTIFYING RISKS

Potential concerns regarding Modern Slavery are monitored through a risk management system. This involves a quarterly process to identify, assess and mitigate risks within the company. Compliance with internal policies and the VW sustainability requirements is regularly assessed. There are various internal controls implemented as part of the risk management system.

As an automotive manufacturer, Bentley has an international and highly complex supply chain and recognises the risk this poses in achieving total visibility. Bentley adopts a consistent level of diligence with its suppliers across all regions to ensure its approach to human rights is replicated through the supply chain. The same principles equally apply to suppliers providing on-site support services at Bentley, for example; on-site catering, construction and cleaning which the UK government has [highlighted as sectors](#) with a heightened risk of forced labour exploitation.

Compliance Risks

Potential compliance risks, including the risk of human rights violations, are recorded and assessed in the VW Risk Management system. Preventative measures are developed and investigations are conducted by relevant departments, including but not limited to, Corporate Audit, Security, Legal, Purchase, and Human Resources, where required.

VW Audit provides independent and objective services aimed at improving business processes to assess and help to improve the effectiveness of risk management controls, and management and monitoring processes. This includes the COSO Enterprise Risk Management Framework. In addition, it carries out sample checks, as well as investigations of suspected violations.

For any Bentley employee with questions or concerns relating to compliance issues, there is a dedicated compliance email address.

CONDUCTING DUE DILIGENCE

Supplier Self-Assessment

Suppliers are asked to confirm their compliance with the VW sustainability standards through a self-assessment questionnaire. If the questionnaire highlights a potential issue, this is flagged to the VW contact responsible for the region. A comprehensive business due diligence process is integrated within the supplier assessment, to compliment the S-rating, the process reviews and addresses integrity and ethics concerns. The S-Rating system is an assessment of suppliers with regard to environmental, social and corruption risks.

Sustainability Audits

Bentley retains the right to commission an independent, external service provider to check that suppliers are operating in accordance with the expected behaviour outlined in the VW sustainability standards.

The outcome of these audits is reviewed by the expert team responsible for the supplier's region and, if necessary, an action plan put into place to address shortcomings. If the supplier is found to be in breach of the VW sustainability standards, and is not prepared to make the necessary changes, Bentley can opt to terminate the relationship.

In the case that a concern is raised regarding a second or third tier supplier, the same principles apply and Bentley will investigate the case with the first tier supplier with the closest relationship to Bentley and/or VW.

Retailer Network

Retailers and authorised repairers are subject to compliance due diligence prior to entering into a contract, and on-going integrity monitoring throughout the contractual period. If an integrity concern is identified during the contractual term, an investigation is conducted and if the business partner is found to be in breach of compliance obligations, Bentley can opt to terminate the relationship.

MONITORING EFFECTIVENESS

The joint Self-Assessment Questionnaire (SAQ) was developed by the members of the industry initiative Drive Sustainability, facilitated by Corporate Sustainability Responsibility (CSR Europe). The SAQ is provided on the external platform supplierassurance.com by the service provider NQC Limited. Suppliers can complete the SAQ once and voluntarily share their responses with different buyers. By this, we aim to reduce the workload for suppliers.

If the minimum requirements are not met and/or the responses in the SAQ point to an increased sustainability risk, an On-Site Check (OSC) is conducted at the supplier's site. This check aims to evaluate our suppliers' sustainability performance and help them to improve if gaps and nonconformities are identified. The OSC is conducted by an independent external partner, which is an internationally experienced audit company. After an OSC, suppliers are informed about the result and a corrective action plan is developed, if necessary.

Bentley uses the Decarbonisation Index (DKI) and Circular Materials Index (CMI) to track supplier performance. These tools help assess sustainability and human rights risks across the supply chain. In 2024, all new suppliers met mandatory human rights criteria, and no violations were reported.

COMMUNICATION AND TRAINING

Bentley communicates with all employees to build awareness of the risks of relating to human rights including Modern Slavery; this includes articles on the company intranet and communications on the Bentley BeConnected App, that can be accessed by all employees to raise awareness. The topic of human rights forms part of the Bentley integrity and compliance annual communication plan. It is intended that these communications will continue to be issued on a regular basis.

All employees are required to undertake Code of Conduct training and must refresh their understanding every three years. The training includes;-

- Code of Conduct
- German Supply Chain Due Diligence Obligations (LKsG).
- Modern Slavery
- Business Human Rights

Employees can provide feedback on the training through a form after face-to-face sessions (blue collar) or a survey after web-based training (white collar). This feedback is periodically reviewed and incorporated into training updates where feasible.

The company also introduced carbon literacy training and enhanced its internal reporting mechanisms and whistleblowing training to ensure concerns can be raised confidentially and effectively.

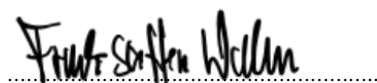
All Bentley suppliers and purchasing colleagues have access to an e-learning module outlining the VW expectations on sustainability. This is accessed through the VW Supplier Portal. Retailers and authorised repairers are required to appoint a responsible person and to undertake the VW Code of Conduct for Business Partner training which is accessed through a Retailer Academy portal.

SUMMARY

Bentley's 2024 sustainability efforts included the implementation of new due diligence system, enhanced training, and measurable supplier assessments. These initiatives reflect our ongoing commitment to eradicating Modern Slavery and promoting ethical business practices.

This statement outlines its commitment to tackling Modern Slavery in all aspects of its business. It is intended that this statement will continue to evolve over time and demonstrate progress on this important issue.

This statement was approved by the Board of Management of Bentley Motors Limited on 26th June 2025, in accordance with the requirements of the Modern Slavery Act 2015.



Frank-Steffen Walliser
Chief Executive Office and Chairperson of the Board
Bentley Motors Limited
26th June 2025