



**BENTLEY**

## **MODERN SLAVERY STATEMENT**

For the year ended 31<sup>st</sup> December 2018

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**

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Bentley Motors Limited is the world's most sought after luxury car manufacturer. The company headquarters in Crewe, UK, are the hub of its operations including design, R&D, engineering and production of the company's four product lines, Continental, Flying Spur, Bentayga and Mulsanne. The company also retails Bentley branded merchandise. Bentley has been part of the Volkswagen Group since 1998.

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 and its business partners.

With specific regard to the Modern Slavery Act, Bentley has a cross functional working group which includes representation from Compliance, Legal, Purchasing and Corporate Social Responsibility. The working group is responsible for implementing and maintaining the relevant policies, communication and training relating to Modern Slavery.

### **POLICIES**

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#### **Code of Conduct**

As a member of the Volkswagen Group, all Bentley employees are expected to respect the Group's Code of Conduct which specifies the expected behaviour of all its business partners with regard to social and environmental standards. In 2017 an updated Code of Conduct was issued to all staff. The Code of Conduct specifically requires all colleagues to act with integrity, and be vigilant against human rights abuses and the importance of raising any concerns to management. The Code of Conduct is publically available for download from the [Bentley Motors Corporate Website](#).

#### **Anti-Slavery and Human Trafficking Policy**

To address the risk of Modern Slavery, Bentley has implemented an Anti-Slavery and Human Trafficking policy.

The policy informs Bentley colleagues about the issue of Modern Slavery, raises awareness within the business and clarifies expectations regarding this topic. This includes compliance with all applicable health



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and safety and employment law and a focus on best practice. The policy refers to guidance on how to spot and report suspected breaches of human rights.

The policy strongly encourages staff to raise any concern about a possible breach of Human Rights immediately and refers to the company whistleblowing policy (see below). For those employed by Bentley, a breach of this policy will be treated as gross misconduct and may be reason for suspension and summary dismissal. The policy is reviewed annually and updated or amended where necessary.

### **Whistleblowing Policy**

Bentley has a whistleblowing policy which covers all persons working for Bentley Motors Limited or on behalf of the company in any capacity, including all contractors, agency workers, third party representatives or any other person associated with the company, wherever located. All staff and business partners have access to an ombudsman service and have the choice to remain anonymous should they wish. Included in the channels available for concerns to be raised is a dedicated email address: [io@volkswagen.de](mailto:io@volkswagen.de)

### **Supplier Sustainability Requirements**

Bentley Motors Ltd expects compliance with human rights and employment legislation from its business partners in accordance with the VW Sustainability Requirements for suppliers. The Sustainability Requirements are an integral part of the contract for all its Tier 1 suppliers.

The basis of the Sustainability Requirements includes: Human rights; 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 Requirements are publically available for download on the [Volkswagen Group Supplier Portal](#) in 8 languages.

If a business partner is in breach of these requirements, the company reserves the right to end the relationship.

### **IDENTIFYING RISKS**

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Potential concerns relating to Modern Slavery are monitored through a risk management system. This involves a quarterly process to scope, evaluate and mitigate risks within the company. Compliance with internal policies and Volkswagen Sustainability Requirements is regularly assessed through this process.

As an automotive manufacturer, Bentley has an international and highly complex supply chain and recognises the risk this poses in achieving total visibility of the value added chain. Bentley adopts a consistent level of diligence with its Tier 1 suppliers across all regions to ensure that its zero-tolerance approach to human trafficking is replicated through the supply chain. The same principles equally apply to suppliers providing on-



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site support services at Bentley, for example; on-site hospitality, construction and cleaning which the UK government has highlighted are industries with a heightened risk of human trafficking.

## **Compliance**

Potential compliance risks, including the risk of human rights violations, are captured and assessed using the overarching regular GRC risk process established throughout the Volkswagen Group. Preventive measures are developed and appropriate compliance programmes are specified on the basis of these results. Internal Audit, Security, HR and Legal divisions are responsible for the necessary investigative measures and responses.

Volkswagen Group Audit conducts regular, systematic reviews of the processes across its Brands (including Bentley), using, among other tools, the internationally recognised COSO Enterprise Risk Management Framework. In addition, it carries out sample checks, regardless of suspicion, as well as investigations of specific suspected violations. For any Bentley employee with questions or concerns relating to compliance issues there is a dedicated email address [compliance@bentley.co.uk](mailto:compliance@bentley.co.uk)

## **CONDUCTING DUE DILIGENCE**

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### **Supplier Self-Assessment**

Suppliers are asked to confirm their compliance with the Sustainability Requirements through a self-assessment questionnaire. If the questionnaire highlights a potential issue, this is flagged to the Volkswagen Group contact responsible for the region.

### **Sustainability Audits**

For selected suppliers 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 Sustainability Requirements.

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, and 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 principle applies and Bentley will investigate the case with the first tier supplier with the closest relationship to Bentley and/or the Volkswagen Group.



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## **MONITORING EFFECTIVENESS**

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To ensure suppliers comply with the expected process, Volkswagen Group reviews quarterly data on the percentage of suppliers who have submitted their self-assessment sustainability questionnaire along with data on those who have completed the sustainability e-learning.

A list of any suppliers who haven't submitted their questionnaire is then passed to the Volkswagen Group sustainability contact for the relevant region. If the self-assessment questionnaire raises a concern about social or environmental issues, an ad-hoc case is raised and these are reported to the Volkswagen Group Board of Management and the Purchasing Directors of all brands for further investigation.

## **COMMUNICATION AND TRAINING**

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In 2018, Bentley communicated with all staff to build awareness of the risks of Modern Slavery; this included articles on the company intranet and a briefing sheet sent to all managers to brief staff locally. It is intended that these communications will continue to be issued on a regular basis.

All Bentley suppliers and purchasing colleagues have access to an e-learning module outlining the Volkswagen Group expectations on sustainability. This is accessed through the Volkswagen Group Supplier Portal.

In addition, Bentley has commissioned a dedicated e-learning module on Modern Slavery which is accessible through the company's e-Academy online learning platform. As part of the initial roll-out of the training all People Managers are required to undertake the module, with over 70% having completed it to date. The module has now been made available to all colleagues in the Purchase and Quality functions who were identified as being in the most regular contact with the supply chain.

## **SUMMARY**

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This statement outlines some of the actions undertaken by Bentley Motors in 2018 as part of 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.

Adrian Hallmark  
Chairman and Chief Executive, Bentley Motors Limited  
21<sup>st</sup> February 2019