



RESPONSIBLE RAW MATERIAL SOURCING POLICY STATEMENT

INTRODUCTION

Located in Crewe, England, Bentley Motors remains the definitive British luxury car company, crafting the world's most desirable high performance grand tourers. The combination of fine craftsmanship, using skills that have been handed down through generations and engineering expertise is unique to Bentley. The luxury marque is creating a future driven by new technologies, materials and skills, in the pursuit of a progressive, new world: one in which the highest levels of luxury mobility are achieved with responsible practices.

As we shape this future, and as a global leader in the development, production and distribution of luxury motor vehicles, Bentley is committed to responsible sourcing and high standards of animal welfare. This applies especially to materials we craft in-house –such as leather, wool textiles and wood veneer – which are transformed into durable components at our Crewe facilities. We recognise that sustainable luxury encompasses more than environmental performance; it also requires the ethical treatment of animals, responsible stewardship of natural resources and consideration of the communities along our value chain. Bentley is therefore progressively enhancing our sourcing and animal welfare standards, in alignment with Volkswagen Group frameworks, to ensure that our products reflect our commitment to ethical, sustainable and responsible practices.

Bentley's responsible sourcing commitments are supported by the broader [Volkswagen Group Responsible Raw Materials Policy](#), which sets out the Group's expectations for ethical, transparent and environmentally responsible raw material supply chains. This commits to respect internationally recognised human rights and environmental frameworks, implement risk based due diligence across raw material supply chains, and promote traceability and transparency from material origin through to downstream use. It encompasses a wide range of materials — including metals, minerals, agricultural and battery raw materials — and requires suppliers to uphold the same sustainability standards and due diligence obligations as Volkswagen Group itself. It also emphasises collaboration with industry initiatives, continuous monitoring and public reporting on progress and risks, and the integration of stakeholder engagement throughout responsible sourcing practices. That is why for other raw materials associated with heightened human rights or environmental risks, Bentley aligns with the Volkswagen Group's RMDDMS. Bentley participates in relevant Group processes and applies the Volkswagen Group Raw Materials Due Diligence Management System (RMDDMS) related requirements where they intersect with Bentley purchasing activities. Bentley does not operate a separate, standalone raw material due diligence system and does not claim direct oversight of upstream extraction activities.

We recognise that animals are sentient beings capable of experiencing joy, pleasure, pain and fear, and that they must be treated with respect and care. Leather and wool remain intrinsic to Bentley's luxury interiors, and we are committed to working with carefully selected suppliers who meet our stringent animal welfare requirements. We are equally committed



to safeguarding the welfare of animals at every stage of their lives, including on-farm, during transport and at slaughter, while enhancing traceability within our supply chains, acknowledging that complexities in multi-tier sourcing, mixed materials and varying regional standards create inherent limitations across the wider industry.

We acknowledge that forests are vital ecosystems that sustain biodiversity, regulate climate and support livelihoods. As a user of high-quality wood for vehicle veneers, Bentley is committed to sourcing wood from sustainably managed forests, respecting internationally recognised human rights including the rights of Indigenous Peoples and local communities in harvesting locations, whilst mitigating other environmental and social risks throughout our supply chain. We aim to promote traceability, apply robust due diligence processes, and explore recycled and reconstituted alternatives to maximise their utilisation and material circularity without compromising quality.

Through these commitments we seek to embed principles that reflect best practice, embedding high standards of animal welfare and responsible wood sourcing across the full lifecycle of our products. We conduct our business on a responsible and long-term basis, ensuring that our growth creates positive value for customers, suppliers, communities, investors and our employees alike.

SCOPE

This Policy Statement applies to all animals producing leather, wool or other fibres, and all wood used in Bentley vehicles, reflecting our commitment to responsible sourcing, animal welfare, and sustainably managed forests. This Policy directly applies to Tier 1 suppliers, while encouraging responsible practices upstream through collaboration, transparency, and industry initiatives.

Materials and ingredients where traceability or influence is limited – such as animal-derived ingredients used in glues, lubricants, paints, and lacquers – or wood and wood products that do not directly generate revenue, including those supplied through service contractors, used for logistical packaging, or for operational site materials and infrastructure, are excluded from this Policy Statement.

Bentley is also exploring opportunities, in collaboration with relevant partners, to broaden the scope of this Policy Statement to include animals producing materials for relevant Bentley branded products, such as furniture, clothing, and accessories, as well as wood and wood based materials used within Bentley brand extension ranges.



OUTCOMES

Leadership: Our managers and relevant teams will demonstrate, through their actions and decision-making, a clear commitment to promote responsible sourcing, animal welfare, and sustainable forest management through the supply chain. They will champion these standards internally and externally, driving a culture of responsible supply chain management and fostering accountability and continuous improvement among suppliers.

Compliance: Bentley will comply with all binding obligations, including regulatory requirements, company standards, and voluntary commitments across all materials, including those related to animal welfare and responsible wood sourcing. This includes adherence to relevant legislation, such as EU and national animal welfare laws, as well as due diligence frameworks like the Volkswagen Group Raw Materials Due Diligence Management System (RMDDMS). Alongside demonstrating regulatory compliance, direct suppliers are required to meet Bentley's mandatory animal welfare and wood sourcing standards. Bentley will verify compliance through our internal due diligence processes and yearly reporting.

Animal welfare: Bentley seeks to protect animal welfare by ensuring that the leather and wool used in our products are sourced responsibly. This includes safeguarding the well-being of animals on-farm, during transport, and at slaughter, and driving continuous improvement through supplier objectives and monitoring.

Sustainable forest management: Bentley seeks to protect forests by sourcing wood from sustainably managed forests, identifying and working with suppliers to address environmental and social risks in harvesting locations, and respecting human rights including Indigenous Peoples' rights. Bentley is also committed to strengthening forest management and traceability, prioritising internationally recognised third party forest management certification where available and progressively increasing the proportion of certified material within our sourcing.

Stakeholder collaboration: We work closely with suppliers, licensees, industry associations, auditors, certification bodies, and relevant non-governmental organisations to ensure that our animal welfare and wood sourcing standards are implemented effectively. This includes training, guidance, risk assessments, action planning as well as the integration of responsible sourcing requirements into new supplier approvals and product nominations. Bentley also engages internal teams, regulators, and external stakeholders to maintain a transparent, accountable, and collaborative approach.

Continual improvement: Bentley is committed to continuously improving the performance and integrity of our supply chains. For animal welfare, this involves conducting risk assessments for all existing and new suppliers, including consideration of farm animal species, geographic, and supplier risks, alongside supplier monitoring and training. For wood sourcing, this includes using our supplier questionnaire to understand supplier performance, conducting product risk assessments for new in-scope products and annually reassessing product risk, while supporting suppliers to meet our standards. Bentley assesses all in-scope Tier 1 suppliers annually. Where opportunities for improvement are identified, Bentley will develop and agree time-bound action plans with suppliers to support targeted progress, ensuring continuous progress toward our responsible sourcing goals. Supplier status and progress for all identified materials will subsequently be included in yearly reporting using clear performance indicators to track advancement, assess impact, and inform future priorities.



POLICY STATEMENT

This Policy Statement and associated implementation systems and processes will be communicated to all relevant colleagues, suppliers and licensees, and made available to regulators and other interested parties. Our principles are to ensure that Bentley sources animal and wood materials responsibly, meeting both mandatory requirements and aspirational standards for sustainability, ethical stewardship, and traceability across our supply chains as described in our sourcing specifications.

All leather and wool used in Bentley vehicle interiors must comply with EU or equivalent national animal welfare legislation and meet Bentley's mandatory standards. Bentley's requirements for suppliers are to:

1. The Bentley risk based due diligence and continuous improvement approach ensures all vehicle leather is sourced from animals reared, transported and slaughtered in accordance with EU animal welfare legislation or more stringent national legislation and is traceable to the slaughterhouse, using Leather Working Group (LWG) Gold rated tanneries.
2. Bentley requires the wool raw material used in our vehicle interior to be from recognised certification schemes that support animal welfare and traceability such as the Responsible Wool Standard, New Zealand Farm Assurance Programme or equivalent in terms of animal welfare requirements. This expectation is designed to reinforce supply chain transparency and strengthen the chain of custody.
3. Source all sheepskins from Australia or New Zealand, from sheep that have not undergone mulesing.
4. Ensure no prohibited animal sources are used.
5. Ensure all leather suppliers have a published animal welfare policy aligned at a minimum with the "Five Freedoms," supported by robust management systems and processes to ensure effective implementation across the supply chain.
6. Provide evidence of compliance, including annual reporting on countries of origin for leather and wool, third-party monitoring, and relevant certifications.
7. Engage collaboratively with suppliers and licensees to provide training, guidance, and support in meeting Bentley's animal welfare requirements.
8. Implement corrective actions and remediation plans for any non-compliance to ensure long-term adherence and continuous improvement.

Ensure all marketing and sustainability claims related to leather and wool sourcing are accurate, transparent, and evidence based. For Bentley vehicles, prohibited animal sources include hides from animals slaughtered specifically for Bentley, bovine hides from animals reared outside the EU or countries with equal or more stringent national legislation e.g., Switzerland., hides from animals reared in Concentrated Animal Feeding Operations (CAFOs) or subjected to hot iron branding, and bovine hides from tanneries that are not LWG Gold rated. Materials obtained from live skinning (e.g.

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reptiles) or live boiling, hides from animals linked to deforestation or forest conversion, and wool from sheep that have undergone mulesing are also strictly prohibited.

All wood products and wood veneers used in Bentley vehicles must comply with all relevant regulation, including but not limited to the EU Deforestation Regulation (EUDR) and UK Timber Regulation (UKTR). All direct suppliers must also demonstrate that they hold third party certification (either Sustainable Forest Management or Chain of Custody) and meet Bentley's Sustainable Forest Management (SFM) expectations. In addition to these supplier requirements, Bentley will:

1. Ensure no sourcing from species with a formal status of Vulnerable, Endangered, or Critically Endangered on the IUCN Red List or that is listed in CITES Appendices I or II.
2. Treat species formally classified as Near Threatened or listed in CITES Appendix III, and wood from countries with elevated environmental or social risks, as high risk, requiring additional due diligence.
3. Identify, assess, and mitigate environmental and human rights risks, including respecting Indigenous Peoples' rights and upholding internationally recognised labour standards and the UN Guiding Principles on Business and Human Rights.
4. Actively engage with suppliers to support compliance, provide guidance and training, address issues and implement agreed improvement actions where Identified.
5. Report opportunities to increase the proportion of third party certified raw materials year on year and where possible the use of recycled or reconstituted wood while maintaining product performance and aesthetic quality.
6. Align with the [Volkswagen Code of Conduct for Business Partners](#), which forms the basis for evaluation, monitoring, and continual improvement across the supply chain.

Bentley articulates its commitments to animal welfare and sustainable wood sourcing through a robust Policy Statement, which defines the principles, objectives and goals that guide our approach. These commitments are implemented through underlying management systems and processes covering R&D materials development, procurement, logistics and quality, supported by employee training and the integration of due diligence into new supplier approvals and product nominations.

Bentley sets clear expectations and conducts rigorous due diligence checks, recognising that while these systems govern implementation, it does not have direct oversight of all upstream activities in the supply chain. For example, suppliers are required to report on the origin and certification of leather, wool, and wood, with submitted information reviewed to verify adherence to Bentley's standards. The Bentley [Whistleblower System](#) is available for reporting any concerns



regarding our own or our suppliers' operations, and suppliers are expected to maintain their own grievance mechanisms to resolve disputes fairly and transparently.

The Policy Statement is a living document, updated over time to reflect legislative, regulatory, and industry developments, with a full review conducted every two years. All updates are communicated to relevant teams and suppliers prior to implementation, ensuring that Bentley's standards for responsible and sustainable sourcing remain rigorous and consistently applied throughout our supply chains.

Frank-Steffen Walliser
Chairman & Chief Executive Officer, Bentley Motors Limited.

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