



**BENTLEY**

## **MODERN SLAVERY STATEMENT**

For the year ended 31<sup>st</sup> December 2023

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") is one of the world's most sought after luxury car manufacturers. The company headquarters in Crewe, UK, are 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 Coachbuilt where rare artisanal skills, modern sustainable design and cutting-edge engineering and innovation, produce a small run of vehicles from personal commission 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.

With specific regard to the Modern Slavery Act, Bentley has a cross functional steering group which formally meet 4 times a year or as is necessary. The steering group includes representation from Compliance, Legal, Purchasing, Human Resources, Security, 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. In 2023, Bentley incorporated measures to support VW and Audi AG to meet their obligations of The German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – "LkSG") that came into force on 1st January 2023. This is part of the German federal government's commitment to safeguard and enhance human rights and environmental standards within the supply chains of companies operating in Germany.

In May 2023, the Bentley Sustainability Council was launched to advise and challenge the Board of Management and relevant internal committees on sustainability topics, including human rights. The Council is a change agent, responsible for guiding Bentley and critically evaluating plans, shaping thinking, and strategic decision-making.

## **POLICIES**

---

### **Code of Conduct**

All Bentley employees and its business partners are expected to respect the Code of Conduct that specifies the expected behaviour of all concerned with regard to social and environmental standards. The Code of Conduct is publicly available for download from the [Bentley Motors Corporate Website](#). 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



**BENTLEY**

business partners to act with integrity, and be vigilant against human rights abuses and the importance of raising any concerns to Bentley or VW. To support this further, Bentley offers training on the VW Code of Conduct for Business Partners within the Bentley global retailer network.

### **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. In 2023, the steering group conducted a major revision of the policy, incorporating LkSG requirements, and renaming the Policy from Anti Slavery and Human Trafficking to Business Human Rights.

The policy informs Bentley colleagues about the issues of business human rights, raises awareness within the business and clarifies expectations regarding this topic of 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 legislation relating to, but not limited to:

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

We also have recruitment processes designed to ensure that appropriate right to work checks are undertaken.

The 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.

### **Whistleblower System Policy**

Bentley has a Whistleblower System policy, which covers all persons working for Bentley 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 employees, suppliers, retailers and authorised repairers have access to an ombudsman service and have the choice to remain anonymous should they wish. Included in the channels available to raise concerns, is a dedicated email address: [whistleblower-office@audi.de](mailto:whistleblower-office@audi.de). The Whistleblower System is also the reporting channel for



**BENTLEY**

all allegations regarding environmental and human rights violations in accordance with the LkSG. Further information can be found [here](#).

### **Supplier Sustainability Requirements**

Bentley expects compliance with human rights and employment legislation from its suppliers in accordance with the VW sustainability requirements for all supplier contracts, especially for those who have a production side and/or, supply tools and machinery as well as for suppliers from the areas of transport, logistics, chemicals and recycling services.

The basis of the sustainability requirements include 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 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 end the relationship.

### **IDENTIFYING RISKS**

---

Potential concerns relating to 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 through this process. 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 of the value added chain. Bentley adopts a consistent level of diligence with its suppliers with which it contracts across all regions to ensure that 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 using the overarching regular risk process established throughout VW. Preventative measures are developed and appropriate compliance programmes are specified on the basis of these results. Investigative measures and responses are conducted as necessary by relevant departments, including but not limited to, Corporate Audit, Security, Legal, Purchase, and Human Resources.

VW Audit conducts regular, systematic reviews of the processes across its group of companies (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



**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**

---

### **Supplier Self-Assessment**

Suppliers are asked to confirm their compliance with the VW sustainability requirements 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**

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 VW 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 of the VW sustainability requirements, 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 principle applies 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 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 CSR Europe. The SAQ is provided on the external platform [supplierassurance.com](https://supplierassurance.com) by the service provider NQC Limited. Due to the standardised questionnaire used by several OEMs, suppliers can complete the SAQ once and voluntarily share their responses with different buyers. By this, we aim to reduce the workload for suppliers who do not need to complete several different sustainability questionnaires from different buyers.

If the above mentioned 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 at evaluating our suppliers' sustainability performance and at helping them to improve it if gaps and nonconformities are identified. The OSC is



**BENTLEY**

conducted by an independent external partner, which is an internationally experienced audit company. After an OSC, our suppliers are informed about the result and a corrective action plan is developed, if necessary.

## **COMMUNICATION AND TRAINING**

---

Bentley communicates with all employees to build awareness of the risks of 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. It is intended that these communications will continue to be issued on a regular basis.

Bentley has a dedicated e-learning module on Modern Slavery, which is accessible through the company's e-Academy online learning platform. Bentley apply a risk based approach to all mandatory training, therefore all employees at management level and above (including Board Members), are required to undertake the training, initially as part of the onboarding process and are required to refresh their understanding every 2 years. In addition, employees deemed to be in high risk roles, such as Purchase and Human Resources, are also required to undertake the awareness training.

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 for them to undertake the VW Code of Conduct for Business Partner training.

## **SUMMARY**

---

This statement outlines some of the actions undertaken by Bentley in 2023 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.

Jan-Henrik Lafrentz  
Member of the Board and Chief Finance Officer, Bentley Motors Limited  
18<sup>th</sup> June 2024