



BENTLEY

MODERN SLAVERY STATEMENT

For the year ended 31st December 2020

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 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 three product lines; Continental, Flying Spur, and Bentayga. 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 is part of the wider HR & Integrity Steering Committee. The working group 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

Code of Conduct

As a member of the Volkswagen Group, all Bentley employees and Business Partners are expected to respect the Group's 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](#). In addition to the general Code of Conduct, in 2019 a Business Partner specific Code of Conduct was issued to Retail and Supply Partners. The Group-wide Code of Conduct for Business Partners defines our sustainability expectations towards suppliers and addresses human rights such as the strict avoidance of any kind of slavery, 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 the wider VW Group. To support this further, training on the Code of Conduct for business partners was rolled out in Q2 2020.

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 and safety and employment laws including our recruitment processes which help us to ensure that any person being recruited to work for Bentley is legally entitled to work in the UK. 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). 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 to raise concerns is a dedicated email address: io@volkswagen.de. [Further information is publically available here.](#)

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 all supplier contracts especially for those who have a production side and/or, supply tools & 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 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

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



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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, amongst 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

CONDUCTING DUE DILIGENCE

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. 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.

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 of the Sustainability Requirements, and are 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.

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 by the service provider NQC Ltd. 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 to improve it if gaps and nonconformities are identified. The OSC is conducted



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

COMMUNICATION AND TRAINING

Bentley communicates with all staff to build awareness of the risks of Modern Slavery; this includes articles on the company intranet and newsletters sent to all employees to inform 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.

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 be required to refresh their understanding every 2 years. In addition, those deemed to be in high risk roles such as Purchase and HR are also required to undertake the awareness training.

SUMMARY

This statement outlines some of the actions undertaken by Bentley Motors in 2020 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
28 February 2021