

# VOLKSWAGEN

AKTIENGESELLSCHAFT



## Code of Conduct for Business Partners

Volkswagen Group requirements regarding sustainability  
in its relationships with business partners

## Kodeks ponašanja za poslovne partnere

Zahtevi Volkswagen Grupe u pogledu održivosti u odnosima  
sa poslovnim partnerima

Internal

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## Preamble

The Volkswagen Group's business partners play an integral part in the Group's business success. Partnership creates lasting business relationships which are mutually beneficial. Therefore, the Group is focused on close cooperation with its business partners.

Applying the sustainability requirements, we are aware of our responsibility for the economic, ecological and social impact of our actions. We also expect this of our business partners, particularly where human rights, health and safety at work, environmental protection and combatting corruption are concerned. In the spirit of partnership-based collaboration, the Volkswagen Group offers its business partners a wide range of practical training opportunities, initiatives and other sources of information. It is recommended that all business partners use these offers and information sources actively.

The following requirements define the Volkswagen Group's expectations regarding the mindset and conduct of business partners in their corporate activities and are considered the basis for successful execution of business relations between the Volkswagen Group and its partners.

## Preambula

Poslovni partneri Volkswagen Grupe igraju sastavnu ulogu u poslovnom uspehu Grupe. Partnerstvo stvara trajne poslovne odnose koji su obostrano korisni. Stoga je Grupa usmerena na blisku saradnju sa svojim poslovnim partnerima.

Primenjujući zahteve održivosti, svesni smo naše odgovornosti za ekonomski, ekološki i društveni uticaj naših akcija. To očekujemo i od naših poslovnih partnera, posebno kada su u pitanju ljudska prava, zdravlje i bezbednost na radu, zaštita životne sredine i suzbijanje korupcije. U duhu saradnje zasnovane na partnerstvu, Volkswagen Grupa svojim poslovnim partnerima nudi širok spektar mogućnosti praktične obuke, inicijativa i drugih izvora informacija. Preporučuje se da svi poslovni partneri aktivno koriste ove ponude i izvore informacija.

Sledeći zahtevi definišu očekivanja Volkswagen Grupe u pogledu načina razmišljanja i ponašanja poslovnih partnera u njihovim korporativnim aktivnostima i smatraju se osnovom za uspešno uspostavljanje poslovnih odnosa između Volkswagen Grupe i njenih partnera.

## 1. Objectives and scope

In this Code of Conduct for Business Partners (hereinafter referred to as "Code of Conduct"), the Volkswagen Group has set out its aspirations and expectations as well as requirements for business partners of the Volkswagen Group in relation to sustainability (hereinafter referred to as "sustainability requirements").

Sustainability includes respecting human rights, protecting the environment, conducting business ethically and lawfully and the responsible sourcing of raw materials.

The Volkswagen Group company that uses this Code of Conduct is referred to in general below as the "Volkswagen Group".

The Code of Conduct is applicable to all suppliers, sales partners and all other B2B business partners (hereinafter referred to as "business partner") of the Volkswagen Group that do business with the Volkswagen Group.

The business partners are required to contractually pass on all sustainability requirements to those business partners (especially suppliers) that affect the contractual relationship with the Volkswagen Group and to ensure, to the extent possible and reasonable, that the sustainability requirements are passed

on to their business partners in the supply chain. The business partners establish appropriate control measures to verify compliance with these sustainability requirements of their own business partners.

In those cases where obligations have been agreed to with business partners under individual contracts that diverge from the principles in this document, such divergent obligations prevail.

The sustainability requirements are based, amongst others, on the 10 Principles of the United Nations (UN) Global Compact, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multi National Enterprises, OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the Conventions of the International Labour Organization (ILO), in particular its fundamental rights at work and the Guiding Principles of the Drive Sustainability Initiative.

Furthermore, this Code of Conduct is based on nationally and internationally agreed standards such as the Universal Declaration of Human Rights, codified in particular in the International Covenant on Civil and Political Rights and in the International Covenant on Economic, Social and Cultural Rights.

## 1. Ciljevi i obim

U ovom Kodeksu ponašanja za poslovne partnere (u daljem tekstu „Kodeks ponašanja“), Volkswagen Grupa je postavila svoje težnje i očekivanja, kao i zahteve za poslovne partnere Volkswagen Grupe u vezi sa održivošću (u daljem tekstu: „zahtevi održivosti“).

Održivost uključuje poštovanje ljudskih prava, zaštitu životne sredine, etičko i zakonito poslovanje i odgovornu nabavku sirovina.

Kompanija Volkswagen Grupe koja primenjuje ovaj Kodeks ponašanja se u daljem tekstu generalno naziva „Volkswagen Grupa“.

Kodeks ponašanja se primenjuje na sve dobavljače, prodajne partnere i sve druge B2B poslovne partnere (u daljem tekstu „poslovni partner“) Volkswagen Grupe koji posluju sa Volkswagen Grupom.

Poslovni partneri su dužni da ugovorom prenesu sve zahteve održivosti na one poslovne partnere (posebno dobavljače) koji utiču na ugovorni odnos sa Volkswagen Grupom i da obezbede, u meri u kojoj je to moguće i razumno, da se zahtevi održivosti prenesu na njihove poslovne partnere u lancu snabdevanja.

Poslovni partneri uspostavljaju odgovarajuće kontrolne mere za verifikaciju usklađenosti sa ovim zahtevima održivosti svojih poslovnih partnera.

U onim slučajevima kada su sa poslovnim partnerima ugovorene obaveze prema pojedinačnim ugovorima koji odstupaju od principa iz ovog dokumenta, takve obaveze imaju prednost.

Zahtevi održivosti su zasnovani, između ostalog, na 10 principa Globalnog dogovora Ujedinjenih nacija (UN), Vodećim principima UN o poslovanju i ljudskim pravima, Smernicama OECD-a za multinacionalna preduzeća, Smernicama OECD-a o dužnoj pažnji za odgovorne lance snabdevanja minerala iz područja pogođenih sukobima i područja visokog rizika i konvencije Međunarodne organizacije rada (ILO), posebno o osnovnim prava na radu i vodećim principima Inicijative za podsticanje održivosti.

Štaviše, ovaj Kodeks ponašanja je zasnovan na nacionalnim i međunarodno dogovorenim standardima kao što je Univerzalna deklaracija o ljudskim pravima, kodifikovana posebno u Međunarodnom paktu o građanskim i političkim pravima i u Međunarodnom paktu o ekonomskim, socijalnim i kulturnim pravima.

## 2. Fundamental sustainability requirements

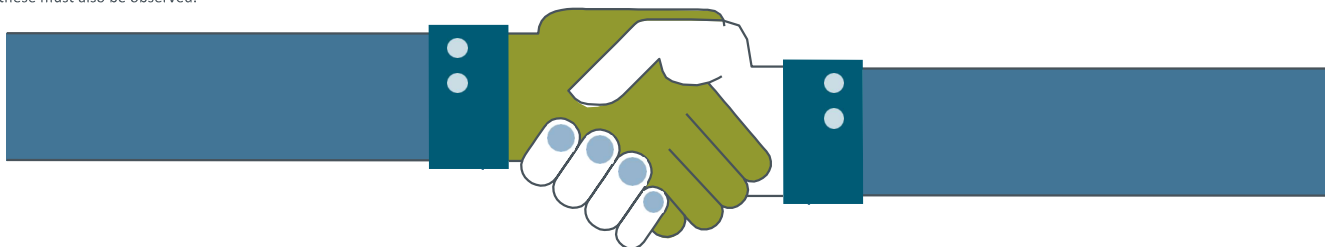
### General information

The Volkswagen Group considers compliance with the sustainability requirements to be essential and fundamental to its business relations.

The Volkswagen Group expects the business partner to integrate the values anchored in these sustainability requirements in day-to-day business through structured and competent management. Business partner management must identify and assess legal and other requirements and train employees to ensure compliance with the relevant requirements.

Business partners always comply with the applicable law. Insofar as these sustainability requirements go beyond the requirements of the applicable law, these must also be observed.

In addition to the obligatory requirements from this Code of Conduct, further recommendations and hints for business partners are given in extra text boxes.



Internal

## 2. Osnovni zahtevi održivosti

### Opšte informacije

Volkswagen Grupa smatra da je usaglašenost sa zahtevima održivosti suštinska i fundamentalna za njene poslovne odnose.

Volkswagen Grupa očekuje od poslovnog partnera da integriše vrednosti koje su ukorenjene u ovim zahtevima održivosti u svakodnevno poslovanje kroz strukturirano i kompetentno upravljanje. Menadžment poslovnih partnera mora identifikovati i proceniti zakonske i druge zahteve i obučiti zaposlene kako bi obezbedila usklađenost sa relevantnim zahtevima.

Poslovni partneri se uvek pridržavaju važećeg zakona. Ukoliko ovi zahtevi održivosti prevazilaze zahteve važećeg zakona, oni se takođe moraju poštovati.

Pored obaveznih uslova iz ovog Kodeksa ponašanja, dalje preporuke i saveti za poslovne partnere date su u dodatnim tekstualnim okvirima.

### Creation and application of management systems

Those business partners that operate production locations with more than 100 employees have to demonstrate certification for these locations according to the international standard ISO 14001 or the EMAS Regulation of the European Union.

Business partners that have production locations with more than 1000 employees have to additionally obtain certification for these locations according to the international standard ISO 45001 or a comparable standard.

#### HINT

For sales partners with more than 100 employees, we likewise recommend the international standard ISO 14001 or alignment with ISO 14001.

Business partners with fewer than 1000 employees in their locations should implement internal management systems or, where available, national/sector specific certifications.

For sales partners with workshops, we likewise recommend the international standard ISO 45001 or alignment with ISO 45001.

### Kreiranje i primena sistema upravljanja

Oni poslovni partneri, koji upravljaju proizvodnim lokacijama sa više od 100 zaposlenih, moraju da pokažu sertifikaciju za ove lokacije prema međunarodnom standardu ISO 14001 ili EMAS Regulativi Evropske unije.

Poslovni partneri koji imaju proizvodne lokacije sa više od 1000 zaposlenih moraju dodatno da dobiju sertifikat za ove lokacije prema međunarodnom standardu ISO 45001 ili prema uporedivom standard.

#### NAPOMENA

Za prodajne partnere sa više od 100 zaposlenih, takođe preporučujemo međunarodni standard ISO 14001 ili usklađivanje sa ISO 14001.

Poslovni partneri sa manje od 1000 zaposlenih na svojim lokacijama treba da primene interne sisteme upravljanja ili, tamo gde su dostupni, nacionalno/sektorski specifične sertifikate.

Za prodajne partnere sa radionicama, takođe preporučujemo međunarodni standard ISO 45001 ili usklađivanje sa ISO 45001.

### Corporate statement

Business partners prepare a corporate statement (e.g. a Code of Conduct), which commits them to social, ethical and environmental standards. This statement should be prepared in languages understood by local employees.

### Sustainability officer

Business partners are encouraged to appoint a sustainability officer or a similar officer who reports to the management of the respective business partner. The officer should develop sustainability objectives and measures within the company.

### Training

To support its business partners in complying with the sustainability requirements, the Volkswagen Group offers its business partners different training formats free of charge ([Trainings and Dialogue vwgroupsupply.com](#)). Participation in this training is obligatory depending on the result of a risk analysis for business partners carried out in advance. Business partners may be exempted from mandatory participation in such training if they can prove to have already undergone a similar training offered by third parties.

#### HINT

Business partners are recommended to develop their own training programs in order to define guidelines to improve implementation of processes and communication of expectations to their employees. Business partners should provide ongoing training for their employees.

### Korporativna izjava

Poslovni partneri pripremaju korporativnu izjavu (npr. Kodeks ponašanja), koja ih obavezuje na društvene, etičke i ekološke standarde. Ova izjava treba da bude pripremljena na jezicima koji lokalni zaposleni razumeju.

### Službenik za održivost

Poslovni partneri se podstiču da imenuju službenika za održivost ili sličnog službenika koji odgovara rukovodstvu dotičnog poslovnog partnera. Službenik treba da razvije ciljeve i mere održivosti unutar kompanije.

### Obuka

Da bi podržala svoje poslovne partnere u ispunjavanju zahteva održivosti, Volkswagen Grupa besplatno nudi svojim poslovnim partnerima različite formate obuke ([Trainings and Dialogue vwgroupsupply.com](#)). Učešće na ovoj obuci je obavezno u zavisnosti od rezultata prethodno sprovedene analize rizika za poslovne partnere. Poslovni partneri mogu biti izuzeti od obaveznog učešća u takvoj obuci ako mogu dokazati da su već prošli sličnu obuku koju nude treća lica.

#### NAPOMENA

Poslovnim partnerima se preporučuje da razviju sopstvene programe obuke kako bi definisali smernice za unapređenje implementacije procesa i saopštavanja očekivanja svojim zaposlenima. Poslovni partneri treba da obezbede stalnu obuku za svoje zaposlene.

### 3. Sustainability requirements in environmental protection

Business partners know and observe the Group environmental policy of the Volkswagen Group as described in the Group Environmental Policy Statement ([Environment.vwgroupsupply.com](https://www.vwgroupsupply.com)).

#### Greenhouse gas emissions

Business partners take appropriate measures to reduce air emissions that pose a risk to the environment and health, including greenhouse gas emissions. In order to improve the environmental performance of products and services, business partners provide for proactive reduction of greenhouse gas emissions along the entire supply chain, for instance through increased use of carbon neutral energy sources.

Business partners who supply products to the Volkswagen Group provide information to the Volkswagen Group on request at product level in relation to the overall energy consumption in MWh and carbon emissions in tonnes (scope 1, 2 and 3) so that the Volkswagen Group can improve the environmental performance indicators of its products.

#### Hint

In addition, we recommend that our business partners set science-based and time-bound emission reduction targets and renewable energy objectives that are aligned to the Paris Agreement and put in place measures that drive forward the decarbonisation along the entire value chain.

Business partners are also encouraged to commit to the Paris Agreement of a CO<sub>2</sub>-neutral economy by 2050.

### 3. Zahtevi održivosti u zaštiti životne sredine

Poslovni partneri poznaju i poštuju ekološku politiku Volkswagen Grupe, kako je opisano u Izjavi o politici zaštite životne sredine Grupe ([Environment.vwgroupsupply.com](https://www.vwgroupsupply.com)).

#### Emisija gasova sa efektom staklene bašte

Poslovni partneri preduzimaju odgovarajuće mere za smanjenje emisija u vazduh koje predstavljaju rizik po životnu sredinu i zdravlje, uključujući i emisiju gasova sa efektom staklene bašte. U cilju poboljšanja ekoloških performansi proizvoda i usluga, poslovni partneri obezbeđuju proaktivno smanjenje emisije gasova sa efektom staklene bašte duž celog lanca snabdevanja, na primer kroz povećanu upotrebu ugljenično neutralnih izvora energije.

Poslovni partneri koji isporučuju proizvode Volkswagen Grupi, daju informacije Volkswagen Grupi na zahtev na nivou proizvoda u vezi sa ukupnom potrošnjom energije u MWh i emisijom CO<sub>2</sub> u tonama (oblast 1, 2 i 3) kako bi Volkswagen Grupa mogla da poboljša indikatore ekološkog učinka svojih proizvoda.

#### Napomena

Pored toga, preporučujemo da naši poslovni partneri postavе naučno zasnovane i vremenski ograničene ciljeve smanjenja emisija i ciljeve obnovljive energije koji su usklađeni sa Pariskim sporazumom i uvedu mere koje pokreću dekarbonizaciju duž celog lanca vrednosti.

Poslovni partneri se takođe ohrabruju da se obavežu na Pariski sporazum o CO<sub>2</sub> neutralnoj ekonomiji do 2050.

### Efficient use of resources

Business partners take appropriate measures to ensure efficient use of energy, water and raw materials, usage of renewable resources and a minimisation of damage to the environment and health.

### Registration, evaluation and restriction of substances and raw materials

Business partners implement appropriate measures to avoid or refrain from using substances and materials with adverse effects on the environment or health (for example, carcinogenic, mutagenic, reprotoxic substances) within the framework of the respective applicable law and with due regard for applicable regulations of the Volkswagen Group.

Business partners are obliged to act in conformity with the requirements of the international conventions and other legal instruments pertaining to the production, use, handling and

disposal of certain substances (in particular including the requirements of the Minamata Convention of 10 October 2013 on mercury, the Stockholm Convention of 23 May 2001 on persistent organic pollutants (POPs)) as well as the related applicable implementing legislation at the national and supranational level.

In regard to smelters or refineries of tin, tungsten, tantalum and gold, business partners may only use raw materials from smelters or refineries that meet the requirements of the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" as assessed by the Responsible Mineral Initiative (RMI) or similar organisations.

Business partners have to take appropriate and adequate measures to exclude raw materials extracted from deep sea mining from their supply chains.

### Efikasno korišćenje resursa

Poslovni partneri preduzimaju odgovarajuće mere kako bi obezbedili efikasno korišćenje energije, vode i sirovina, korišćenje obnovljivih resursa i minimizaciju štete po životnu sredinu i zdravlje.

### Registracija, evaluacija i ograničavanje supstanci i sirovina

Poslovni partneri sprovode odgovarajuće mere za izbegavanje ili uzdržavanje od upotrebe supstanci i materijala sa štetnim uticajem na životnu sredinu ili zdravlje (na primer, kancerogene, mutagene, reprotoksične supstance) u okviru odgovarajućeg važećeg zakona i uz dužno poštovanje važećih propisa Volkswagen Grupe.

Poslovni partneri su u obavezi da postupaju u skladu sa zahtevima međunarodnih konvencija i drugih pravnih instrumenata koji se odnose na proizvodnju, upotrebu, rukovanje i odlaganje

određenih supstanci (posebno uključujući zahteve Minamatske konvencije od 10. oktobra 2013. o živi, Štokholmska konvencija od 23. maja 2001. o postojanim organskim zagađivačima (POP)), kao i srodnim važećim zakonima koji se primenjuju na nacionalnom i nadnacionalnom nivou.

U vezi sa topionicama ili rafinerijama kalaja, volframa, tantala i zlata, poslovni partneri mogu da koriste samo sirovine iz topionica ili rafinerija koje ispunjavaju zahteve „Uputstva OECD-a o dužnoj pažnji za odgovorne lance snabdevanja mineralima iz područja pogođenih sukobima i visoko rizičnih područja” prema proceni organizacije Responsible Mineral Initiative (RMI) ili sličnih organizacija.

Poslovni partneri moraju da preduzmu odgovarajuće i adekvatne mere da iz svojih lanaca snabdevanja isključe sirovine izvađene iz dubokomorskog rudarstva.

### Circular economy and waste management

Business partners take appropriate and adequate measures aimed at avoiding waste, re-using resources, recycling as well as the safe, environmentally friendly disposal of residual waste, chemicals and wastewater. Such measures can be applied in particular in development activities, production, product service life and subsequent end-of-life recycling as well as in other activities. Thereby, the business partners comply with international agreements on the cross-border transport of hazardous waste, in particular the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 as well as with the corresponding, applicable implementation rules at national and supranational level.

#### HINT

Whenever technically possible and economically reasonable, business partners should use secondary materials within their processes. Business partners should know the percentage of recycled content in their products and make this information available to the Volkswagen Group on request.

Business partners should endeavour to pursue and promote closed loop systems in addition to following these principles.

### Kružna privreda i upravljanje otpadom

Poslovni partneri preduzimaju odgovarajuće i adekvatne mere u cilju izbegavanja otpada, ponovnog korišćenja resursa, reciklaže kao i bezbednog, ekološki prihvatljivog odlaganja preostalog otpada, hemikalija i otpadnih voda. Takve mere se mogu primeniti posebno u razvojnim aktivnostima, proizvodnji, životnom veku proizvoda i naknadnom recikliranju na kraju životnog veka, kao i u drugim aktivnostima. Ovim se poslovni partneri pridržavaju međunarodnih sporazuma o prekograničnom transportu opasnog otpada, posebno Bazelske konvencije o kontroli prekograničnog kretanja opasnog otpada i njihovog odlaganja od 22. marta 1989. godine, kao i odgovarajućih, primenljivih pravila implementacije na nacionalnom i nadnacionalnom nivou.

#### NAPOМЕНА

Kad god je tehnički moguće i ekonomski razumno, poslovni partneri treba da koriste sekundarne materijale u svojim procesima. Poslovni partneri treba da znaju procenat recikliranog sadržaja u svojim proizvodima i da ove informacije stave na raspolaganje Volkswagen Grupi na zahtev.

Poslovni partneri treba da nastoje da prate i promovišu sisteme zatvorene petlje pored poštovanja ovih principa.

## Water

Business partners take appropriate and adequate measures to minimise water consumption at their sites and/or along their own supply chains with prioritisation for water stressed regions. The right to water is respected at all times.

Business partners that supply products to the Volkswagen Group provide, upon request, the Volkswagen Group with information on total fresh water consumption on product level.

### HINT

Suitable measures may, in particular, include those aimed at effectively reducing, re-using and recycling water with responsible and effective treatment of wastewater discharges to protect the environment and improve overall water quality.

Business partners shall, where required, seek to ensure that people affected by their operations have access to safe, acceptable and affordable water in sufficient quantities for personal use.

## Biodiversity

The protection of the natural ecosystem, especially the protection of endangered habitats of wild animals, and the sustainable usage of natural resources are required to be ensured.

Business partners must strive to ensure supply chains are free of deforestation and conversion in accordance with applicable law and international biodiversity regulations. These international regulations include, for example, the resolutions and recommendations on biodiversity from the Centre for Biological Diversity (CBD) and the World Conservation Union (IUCN).

### Ethical Treatment of animals

Business partners should support and promote ethical and humane treatment of animals.

## Voda

Poslovni partneri preduzimaju odgovarajuće i adekvatne mere da minimiziraju potrošnju vode na svojim lokacijama i/ili duž sopstvenih lanaca snabdevanja sa davanjem prioriteta za regione sa nedostatkom vode. Pravo na vodu se poštuje u svakom trenutku.

Poslovni partneri koji isporučuju proizvode Volkswagen Grupi, na zahtev, Volkswagen Grupe daju informacije o ukupnoj potrošnji sveže vode na nivou proizvoda.

### NAPOMENA

Odgovarajuće mere mogu, posebno, uključivati one koje imaju za cilj efikasno smanjenje, ponovnu upotrebu i reciklažu vode sa odgovornim i efikasnim tretmanom ispuštanja otpadnih voda, u cilju zaštite životne sredine i poboljšanja ukupnog kvaliteta vode.

Poslovni partneri će, gde je to potrebno, nastojati da obezbede da ljudi pogođeni njihovim poslovanjem imaju pristup bezbednoj, prihvatljivoj i pristupačnoj vodi u dovoljnim količinama za ličnu upotrebu.

## Biodiverzitet

Potrebno je obezbediti zaštitu prirodnog ekosistema, posebno zaštitu ugroženih staništa divljih životinja, kao i održivo korišćenje prirodnih resursa.

Poslovni partneri moraju nastojati da obezbede da lanci snabdevanja budu bez krčenja šuma i konverzije u skladu sa važećim zakonom i međunarodnim propisima o biodiverzitetu. Ovi međunarodni propisi uključuju, na primer, rezolucije i preporuke o biodiverzitetu Centra za biološku raznovrsnost (CBD) i Svetske unije za zaštitu prirode (IUCN).

### Etički tretman životinja

Poslovni partneri treba da podrže i promovišu etičko i humano postupanje prema životinjama.

## 4. Sustainability requirements in the area of human rights and employment law of employees

Business partners are required to comply with the conventions of the International Labour Organization (ILO) as amended from time to time, in particular the fundamental rights at work.

### Elimination of child labour and the protection of young workers

Business partners must comply with the minimum employment age in their business activities and their supply chain. They ensure that the minimum age for acceptance for employment is determined according to the respective applicable law and that prohibited child labour does not occur.

### No modern slavery, no human trafficking and no unethical recruitment

Business partners must take appropriate and adequate measures to eliminate debt bondage, forced and compulsory labour, as well as all forms of modern slavery and human trafficking in their own area of responsibility and/or along the supply chain. Business partners ensure that employment relationships are voluntary and allow employees to give notice of their own volition in observance of a reasonable notice period. Employees of business partners are given a contract at the time of hiring that complies with applicable law and is in a sufficiently documented form (e.g. written or electronic), is written in a language they un-

derstand and in which their rights and obligations are truthfully and clearly set out.

Furthermore, business partners must not mislead or defraud potential employees about the nature of the work, ask employees to pay recruitment fees or inappropriate transportation fees, and/or confiscate, destroy, conceal, and/or deny access to employee passports and other identity documents issued by government and/or restrict the employees' freedom of movement or require employees to involuntarily use accommodation provided by the company for no operational reason.

### Protection of bodily integrity, no corporal punishment

Business partners attach the utmost importance to the protection of bodily integrity and introduce appropriate measures to ensure respect for this legally protected right. Business partners ensure in their area of responsibility and along their supply chain that any involvement, including complicity or participation in kidnapping, torture, killing or similar acts, is excluded and that no corporal punishment is applied as part of their disciplinary practices. In addition, business partners ensure in their own area of responsibility and along the supply chain that other serious human rights violations and abuses, such as sexual violence, as well as war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide, are prohibited.

## 4. Zahtevi održivosti u oblasti ljudskih prava i radnog prava zaposlenih

Poslovni partneri su dužni da se pridržavaju konvencija Međunarodne organizacije rada (ILO) koje se s vremena na vreme menjaju, a posebno osnovna prava na radu.

### Ukidanje dečijeg rada i zaštita mladih radnika

Poslovni partneri moraju da se pridržavaju minimalne starosne granice za zapošljavanje u svojim poslovnim aktivnostima i lancu snabdevanja. Oni obezbeđuju da se minimalna starosna granica za prijem u radni odnos utvrdi u skladu sa odgovarajućim važećim zakonom i da se ne dešava zabranjen rad dece.

### Bez modernog ropstva, bez trgovine ljudima i bez neetičkog regrutovanja

Poslovni partneri moraju preduzeti odgovarajuće i adekvatne mere za eliminisanje dužničkog ropstva, prinudnog i obaveznog rada, kao i svih oblika savremenog ropstva i trgovine ljudima u svojoj zoni odgovornosti i/ili duž lanca snabdevanja. Poslovni partneri osiguravaju da radni odnosi budu dobrovoljni i omogućavaju zaposlenima da daju otkaz po sopstvenoj volji uz poštovanje razumnog otkaznog roka. Zaposleni kod poslovnih partnera dobijaju ugovor u trenutku zapošljavanja koji je u skladu sa važećim zakonom i koji je u dovoljno dokumentovanoj formi (npr. pisani ili elektronski), napisan na jeziku koji

razumeju i na kome su njihova prava i obaveze pravično i jasno izloženi.

Štaviše, poslovni partneri ne smeju da dovode u zabludu ili obmanjuju potencijalne zaposlene o prirodi posla, da traže od zaposlenih da plate naknade za zapošljavanje ili neprikladne naknade za prevoz, i/ili da konfiskuju, unište, sakriju i/ili uskrate pristup pasošima i drugim ličnim dokumentima zaposlenih. Koje izdaje vlada i/ili da ograničavaju slobodu kretanja zaposlenih ili da zahtevaju od zaposlenih da nevoljno koriste smeštaj koji im je obezbedila kompanija bez operativnog razloga.

### Zaštita telesnog integriteta, nema telesnog kažnjavanja

Poslovni partneri pridaju izuzetan značaj zaštiti telesnog integriteta i uvode odgovarajuće mere kako bi obezbedili poštovanje ovog zakonom zaštićenog prava. Poslovni partneri obezbeđuju u svojoj zoni odgovornosti i duž svog lanca snabdevanja da bilo kakvo učešće, uključujući saučesništvo ili učešće u otmici, mučenju, ubistvu ili sličnim radnjama, bude isključeno i da se ne primenjuje fizičko kažnjavanje kao deo njihove disciplinske prakse. Pored toga, poslovni partneri obezbeđuju u svojoj zoni odgovornosti i duž lanca snabdevanja, da druga ozbiljna kršenja i zloupotrebe ljudskih prava, kao što su seksualno nasilje, kao i ratni zločini ili druga ozbiljna kršenja međunarodnog humanitarnog prava, zločini protiv čovečnosti ili genocid, budu zabranjeni

## Compensation and benefits

Business partners pay their employees a reasonable wage. A reasonable wage is at least the minimum wage established under the applicable law and is otherwise measured according to the law of the place of employment. This wage should at least, as far as possible, cover the basic needs of employees and enable a decent standard of living for employees and their families (living wage). Business partners are required to pay employees directly, in full and on time.

## Occupational health and safety, fire protection

Business partners comply with the applicable occupational health, safety and fire protection legislation. Business partners establish a process enabling the continuous reduction of work-related health and safety risks and improvement of occupational health, safety and fire protection. All occupational health and safety measures must not involve any expenditure for the employees.

In particular, business partners will:

- Inform employees of identified hazards and the associated preventive and corrective measures put in place to minimise risks. The information must be available in an appropriate language.
- Conduct sufficient training measures on the prevention of work-related health disorders and of accidents at work, as well as first aid, chemicals management and fire protection.

- Provide suitable protective equipment and protective clothing free of charge.
- Provide appropriate fire protection measures (technical, structural or organisational) to reduce damage in the event of fire.
- Monitor and control work-related health and safety hazards (e.g. chemical, biological, physical and physiological dangers) as well as the corresponding protective measures.
- Label chemicals used according to the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) or, in European countries, the Classification, Labelling and Packaging (CLP) regulation. Chemicals must be stored, transported and handled in accordance with the applicable legal and contractual requirements.
- Fully explain appropriate emergency plans and provide the corresponding first aid, fire protection and medical assistance, as well as materials and adequate transport for further treatment.
- Ensure an appropriate number of emergency exits, escape routes and emergency assembly points, all of which are marked with sufficient signage.

In case of an accident, first aid and medical assistance must be provided. In the event of work-related health hazards, such as pandemics, the business partners take all appropriate measures to protect their employees and the company. Thereby, any measures issued by the local authorities have to be fully observed and complied with.

## Naknade i beneficije

Poslovni partneri svojim zaposlenima plaćaju razumnu platu. Razumna zarada je najmanje minimalna zarada utvrđena važećim zakonom i inače se meri u skladu sa zakonom o mestu zapošljavanja. Ova zarada treba da u najmanju ruku, koliko je to moguće, pokrije osnovne potrebe zaposlenih i omogući pristojan životni standard za zaposlene i njihove porodice (zarada za život). Poslovni partneri su dužni da direktno, u potpunosti i na vreme plaćaju zaposlene.

## Bezbednost i zdravlje na radu, zaštita od požara

Poslovni partneri se pridržavaju važećeg zakona o zdravlju, bezbednosti i zaštiti od požara. Poslovni partneri uspostavljaju proces koji omogućava kontinuirano smanjenje zdravstvenih i bezbednosnih rizika vezanih za rad i unapređenje zdravlja na radu, bezbednosti i zaštite od požara. Sve mere zaštite zdravlja i bezbednosti na radu ne smeju da podrazumevaju bilo kakve troškove za zaposlene.

Konkretno, poslovni partneri će:

- Obavestiti zaposlene o identifikovanim opasnostima i povezanim preventivnim i korektivnim merama koje su preduzete kako bi se rizici sveli na minimum. Informacije moraju biti dostupne na odgovarajućem jeziku.
- Sprovesti dovoljne mere obuke o sprečavanju zdravstvenih poremećaja i nezgoda na radu, kao i o pružanju prve pomoći, rukovanju hemikalijama i zaštiti od požara.

- Obezbediti odgovarajuću zaštitnu opremu i zaštitnu odeću besplatno.
- Obezbediti odgovarajuće mere zaštite od požara (tehničke, strukturalne ili organizacione) kako bi se smanjila šteta u slučaju požara.
- Nadgledati i kontrolisati opasnosti po zdravlje i bezbednost na radu (npr. hemijske, biološke, fizičke i fiziološke opasnosti), kao i odgovarajuće zaštitne mere.
- Označiti hemikalije koje se koriste u skladu sa Globalno harmonizovanim sistemom klasifikacije i obeležavanja hemikalija (GHS) ili, u evropskim zemljama, Uredbom o klasifikaciji, obeležavanju i pakovanju (CLP). Hemikalije se moraju skladištiti, transportovati i njima se mora rukovati u skladu sa važećim zakonskim i ugovornim zahtevima.
- U potpunosti objasniti odgovarajuće planove za hitne slučajeve i obezbediti odgovarajuću prvu pomoć, zaštitu od požara i medicinsku pomoć, kao i materijal i adekvatan transport za dalje lečenje.
- Obezbediti odgovarajući broj izlaza u slučaju nužde, puteva za evakuaciju i sabirnih mesta za hitne slučajeve, a sve to treba biti označeno dovoljnim brojem znakova.

U slučaju nezgode mora se pružiti prva pomoć i medicinska pomoć. U slučaju opasnosti po zdravlje na poslu, poput pandemije, poslovni partneri preduzimaju sve odgovarajuće mere da zaštite svoje zaposlene i kompaniju. Stoga se sve mere koje izdaju lokalne vlasti moraju u potpunosti pratiti i poštovati.

### Working hours

Business partners ensure that working hours comply with national law and/or the national requirements in force in the respective economic sector.

### Working and living conditions

Business partners provide their employees with toilet facilities and access to clean drinking water. All facilities for the consumption and preparation of food as well as for food storage comply with applicable minimum hygiene requirements. If the nature of the work requires the provision of dormitories for employees, sufficient space, cleanliness and safety is ensured. Their access must not be restricted inappropriately.

### No harm to land, water, air

Business partners ensure that they do not cause harmful soil modification, water pollution, air pollution, harmful noise emission or excessive water consumption, which may lead to significant impairment of the natural foundations for food and drinking water or the health of a person.

### No forced eviction

Business partners comply with the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests and waters in the acquisition phase, development or other use of land, forests and waters.



Internal

### Radno vreme

Poslovni partneri obezbeđuju da radno vreme bude u skladu sa nacionalnim zakonom i/ili nacionalnim zahtevima koji su na snazi u dotičnom ekonomskom sektoru.

### Uslovi rada i života

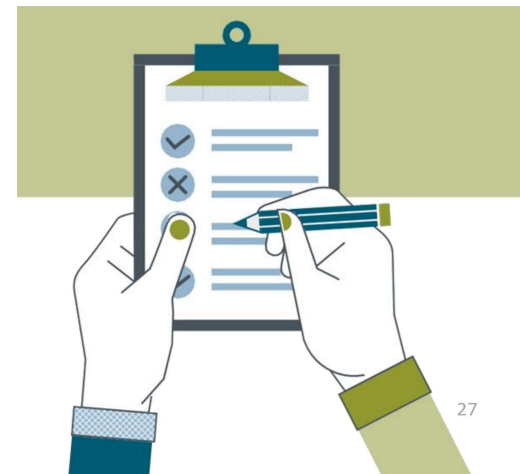
Poslovni partneri obezbeđuju svojim zaposlenima toalet i pristup čistoj vodi za piće. Svi objekti za konzumaciju i pripremu hrane kao i za skladištenje hrane su u skladu sa važećim minimalnim higijenskim zahtevima. Ukoliko priroda posla zahteva obezbeđivanje spavaonica za zaposlene, obezbeđuje se dovoljno prostora, čistoća i bezbednost. Njihov pristup ne sme biti ograničen na neodgovarajući način.

### Nema štete za zemlju, vodu, vazduh

Poslovni partneri se staraju da ne prouzrokuju štetnu modifikaciju zemljišta, zagađenje vode, zagađenje vazduha, emisiju štetne buke ili prekomernu potrošnju vode, što može dovesti do značajnog narušavanja prirodnih osnova za ishranu i vodu za piće ili zdravlja čoveka.

### Nema prinudnog iseljenja

Poslovni partneri poštuju zabranu protivpravnog iseljenja i zabranu protivpravnog oduzimanja zemljišta, šuma i voda u fazi sticanja, uređenja ili drugog korišćenja zemljišta, šuma i voda.



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### Human rights defenders

Business partners must not tolerate or engage in any form of threats, intimidation or attacks against human rights and environment defenders, including those exercising their rights to freedom of expression, association, peaceful assembly and protest against the business activities of the business partner. They guarantee access to their grievance channels without the threat or imposition of retaliatory measures.

### Freedom of association and collective bargaining

The business partners recognise the right of all employees to form trade unions and employee representation bodies and to join them. In this context, the business partners commit to safeguarding neutrality. This precludes any form of discrimination or retaliatory measures based on union activities. Business partners recognise the right to collective bargaining and the right of trade unions to be allowed to operate freely and in accordance with the law of the place of employment. This law includes the right to strike and the right to negotiate collectively.

#### HINT

If this right is constrained by any applicable laws, alternative and lawful possibilities to establish employee representation should be fostered.

Business partners shall promote social and societal dialogue based on collective bargaining, where possible, in order to ensure that work hours are humane and compatible with health.

### Branitelji ljudskih prava

Poslovni partneri ne smeju tolerisati niti se upuštati u bilo koji oblik pretnji, zastrašivanja ili napada na branioce ljudskih prava i životne sredine, uključujući i one koji ostvaruju svoja prava na slobodu izražavanja, udruživanja, mirnog okupljanja i protesta protiv poslovnih aktivnosti poslovnog partnera. Oni garantuju pristup svojim kanalima za žalbe bez pretnji ili nametanja mera odmazde.

### Sloboda udruživanja i kolektivnog pregovaranja

Poslovni partneri priznaju pravo svih zaposlenih da formiraju sindikate i predstavnička tela zaposlenih i da im se pridruže. U tom kontekstu, poslovni partneri se obavezuju na očuvanje neutralnosti. Ovo isključuje svaki oblik diskriminacije ili odmazde na osnovu sindikalnih aktivnosti. Poslovni partneri priznaju pravo na kolektivno pregovaranje i pravo sindikata na slobodan rad i u skladu sa zakonom mesta zaposlenja. Ovaj zakon uključuje pravo na štrajk i pravo na kolektivno pregovaranje.

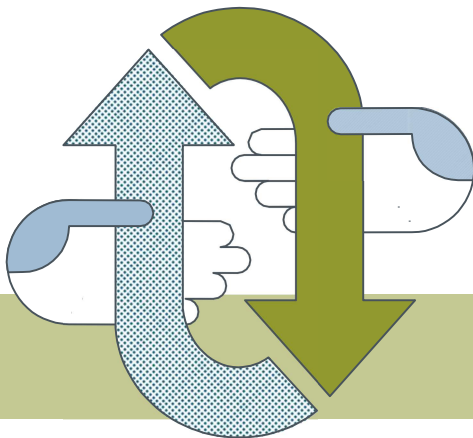
#### NAPOMENA

Ako je ovo pravo ograničeno bilo kojim važećim zakonima, treba podsticati alternativne i zakonske mogućnosti za uspostavljanje zastupanja zaposlenih.

Poslovni partneri će promovisati socijalni i društveni dijalog zasnovan na kolektivnom pregovaranju, gde je to moguće, kako bi se obezbedilo da radno vreme bude humano i kompatibilno sa zdravljem.

### No discrimination or harassment

Business partners ensure that all forms of discrimination, intimidation, harassment or unwarranted disadvantage towards their employees and in the work environment are avoided. In particular, unequal treatment is prohibited, for example due to ethnic or social origin, skin colour, gender, nationality, language, religion, physical or mental limitations, gender identity, sexual orientation, health status, age, marital status, pregnancy/parenthood, union membership or political persuasion, to the extent that it is based on democratic principles and tolerance of dissent, unless it is justified by the requirements of employment. Unfair treatment shall include, in particular, unequal pay for work of equal value.



### Bez diskriminacije ili uznemiravanja

Poslovni partneri obezbeđuju da se izbegnu svi oblici diskriminacije, zastrašivanja, uznemiravanja ili neopravdanog ugrožavanja zaposlenih u radnom okruženju. Posebno je zabranjen nejednak tretman, na primer zbog etničkog ili socijalnog porekla, boje kože, pola, nacionalnosti, jezika, vere, fizičkih ili mentalnih ograničenja, rodnog identiteta, seksualne orijentacije, zdravstvenog statusa, starosti, bračnog statusa, trudnoće/roditeljstva, sindikalnog članstva ili političkog ubeđenja, u meri u kojoj je zasnovano na demokratskim principima i toleranciji neslaganja, osim ako je to opravdano uslovima zaposlenja. Nepravedan tretman obuhvata, naročito, nejednaku platu za rad jednake vrednosti.

### Use of security forces

Business partners ensure that the commissioning or deployment of security forces does not lead to violations of human rights. Business partners ensure not to contribute directly or indirectly to supporting private or public security forces that unlawfully exercise control over mining sites, transportation routes and upstream stakeholders in the supply chain.

#### HINT

Business partners should apply the Voluntary Principles for Security and Human Rights, if applicable.

### Minorities, vulnerable groups and indigenous people

Business partners respect the rights of minorities, vulnerable groups and local communities to decent living conditions.

#### Diversity and inclusion

Business partners should develop and promote an inclusive culture where diversity is valued. Diversity shall be promoted among all employees at all hierarchical levels, in particular, but not exclusively, cultural, ethnic and religious diversity.

Business partners shall ensure that all employees can contribute fully and realise their full potential and ensure a healthy work-life balance.

Business partners are encouraged to foster working with diverse business partners managed or owned by minority groups and women.

### Upotreba snaga bezbednosti

Poslovni partneri osiguravaju da angažovanje ili raspoređivanje snaga bezbednosti ne dovede do kršenja ljudskih prava. Poslovni partneri obezbeđuju da ne doprinose direktno ili indirektno podršci privatnim ili javnim bezbednosnim snagama koje nezakonito vrše kontrolu nad rudarskim lokacijama, transportnim rutama i uzvodnim akterima u lancu snabdevanja.

#### NAPOMENA

Poslovni partneri treba da primenjuju Dobrovoljne principe za bezbednost i ljudska prava, ako je primenljivo.

### Manjine, ugrožene grupe i starosedeoci

Poslovni partneri poštuju prava manjina, ugroženih grupa i lokalnih zajednica na pristojne uslove života.

#### Raznolikost i inkluzija

Poslovni partneri treba da razviju i promovišu inkluzivnu kulturu u kojoj se ceni raznolikost. Raznolikost će se promovisati među svim zaposlenima na svim hijerarhijskim nivoima, posebno, ali ne isključivo, kulturna, etnička i verska raznolikost.

Poslovni partneri će obezbediti da svi zaposleni mogu u potpunosti da doprinesu i ostvare svoj puni potencijal i obezbede zdrav balans između posla i privatnog života.

Poslovni partneri se podstiču da neguju rad sa različitim poslovnim partnerima kojima upravljaju ili su u vlasništvu manjinskih grupa i žena.

## 5. Sustainability requirements for business ethics

Business partners act with integrity at all times and take adequate and appropriate measures to end violations if they are identified.

### Avoiding conflicts of interest

Business partners make their decisions solely on the basis of objective criteria and must not allow themselves to be influenced by extraneous interests or relationships.

### Prohibition of corruption

Business partners reject and prevent all forms of corruption, including what are known as facilitation payments (payments to speed up the performance of routine tasks by officials). Business partners ensure that their employees, subcontractors and agents do not grant, offer or accept bribes, kickbacks, improper donations or other improper payments or benefits to or from customers, officials or other third parties.

### Free competition

Business partners respect fair and free competition and comply with the applicable competition and antitrust rules. In particular, they must not enter into anti-competitive arrangements or agreements with competitors, suppliers, customers or other third parties nor abuse a possible market dominant position. Business partners ensure that no exchange of competitively sensitive information or any other behaviour that restricts or could potentially restrict competition in an improper manner takes place within their area of responsibility.

### Import and export controls

Business partners strictly comply with all applicable laws for the import and export of goods, services and information. Furthermore, the respective applicable sanction lists will be followed.

Business partners ensure that all taxes, duties and royalties levied in connection with the mining, trade and export of minerals in conflict and high-risk areas are remitted in accordance with respective applicable law.

## 5. Zahtevi održivosti za poslovnu etiku

Poslovni partneri se ponašaju sa integritetom u svakom trenutku i preduzimaju adekvatne i odgovarajuće mere za okončanje prekršaja ako se identifikuju.

### Izbegavanje sukoba interesa

Poslovni partneri donose odluke isključivo na osnovu objektivnih kriterijuma i ne smeju dozvoliti da budu pod uticajem stranih interesa ili veza.

### Zabrana korupcije

Poslovni partneri odbacuju i sprečavaju sve oblike korupcije, uključujući i ono što je poznato kao olakšice (plaćanja za ubrzavanje obavljanja rutinskih zadataka od strane zvaničnika). Poslovni partneri osiguravaju da njihovi zaposleni, podizvođači i agenti ne odobravaju, nude ili prihvataju mito, potplaćivanje, nepropisne donacije ili druge nepropisne isplate ili beneficije klijentima, zvaničnicima ili trećim licima ili od njih.

### Slobodna konkurencija

Poslovni partneri poštuju fer i slobodnu konkurenciju i poštuju primenljiva pravila konkurencije i antimonopolska pravila. Posebno, ne smeju da sklapaju antikongkurentske aranžmane ili sporazume sa konkurentima, dobavljačima, kupcima ili drugim trećim licima, niti da zloupotrebljavaju moguću dominantnu poziciju na tržištu. Poslovni partneri obezbeđuju da se u njihovoj zoni odgovornosti ne odvija razmena osetljivih informacija o konkurenciji ili bilo koje drugo ponašanje koje ograničava ili bi potencijalno moglo da ograniči konkurenciju na neprikladan način.

### Kontrole uvoza i izvoza

Poslovni partneri se striktno pridržavaju svih važećih zakona za uvoz i izvoz robe, usluga i informacija. Pored toga, poštujuće se odgovarajuće primenljive liste sankcija.

Poslovni partneri obezbeđuju da se svi porezi, dažbine i autorska prava u vezi sa rudarstvom, trgovinom i izvozom minerala u konfliktnim i visoko rizičnim područjima uplaćuju u skladu sa odgovarajućim važećim zakonom.

### Prohibition of money laundering

Business partners ensure compliance with the applicable legal provisions against money laundering within their business operations.

### Intellectual property rights

Business partners respect intellectual property rights and protect associated information.

### Protection of confidential information

Business partners ensure that sensitive data (trade secrets and personal data) is properly and lawfully collected, processed, saved and deleted. Business partners impose a corresponding obligation on their employees. Sensitive data must not be, transmitted to a third party or made available in any other form without the necessary authorisation and must be protected in this respect.

### Usage of artificial intelligence

Data privacy and security are crucial requirements for the use of Artificial Intelligence (AI). Business partners ensure that all developments using AI are subject to applicable laws and regulations.

AI systems are to be created reliable and without any discrimination. Control of AI applications always remains with human beings.

### No support for armed groups

Business partners exclude that their business contributes directly or indirectly to supporting non-state armed groups.

### Disclosure and information

Business partners record information regarding their business activities, working methods, health and safety and environmental practices. Such information is disclosed, when requested by the Volkswagen Group, insofar as the disclosure does not violate legal requirements.

### Zabrana pranja novca

Poslovni partneri u svom poslovanju obezbeđuju poštovanje važećih zakonskih odredbi protiv pranja novca.

### Prava intelektualne svojine

Poslovni partneri poštuju prava intelektualne svojine i štite povezane informacije.

### Zaštita poverljivih informacija

Poslovni partneri obezbeđuju da se osetljivi podaci (poslovne tajne i lični podaci) pravilno i zakonito prikupljaju, obrađuju, čuvaju i brišu. Poslovni partneri nameću odgovarajuću obavezu svojim zaposlenima. Osetljivi podaci se ne smeju prenositi trećoj strani ili stavljati na raspolaganje u bilo kom drugom obliku bez neophodnog ovlašćenja i moraju biti zaštićeni u tom pogledu.

### Upotreba veštačke inteligencije

Privatnost i bezbednost podataka su ključni zahtevi za korišćenje veštačke inteligencije (AI). Poslovni partneri obezbeđuju da svi razvoji koji koriste veštačku inteligenciju podležu važećim zakonima i propisima.

Sistemi veštačke inteligencije treba da budu kreirani pouzdani i bez ikakve diskriminacije. Kontrola nad primenama veštačke inteligencije uvek ostaje na ljudskim bićima.

### Bez podrške oružanim grupama

Poslovni partneri isključuju da njihovo poslovanje doprinosi direktno ili indirektno podršci nedržavnim oružanim grupama.

### Obelodanjivanje i informacije

Poslovni partneri beleže informacije o svojim poslovnim aktivnostima, metodama rada, zaštiti zdravlja i zaštiti životne sredine. Takve informacije se obelodanjuju na zahtev Volkswagen Grupe, ukoliko obelodanjivanje ne krši zakonske zahteve.

## 6. Sustainability requirements for responsible supply chains

### Transparency

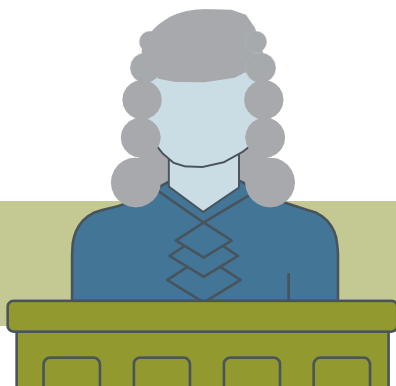
To identify and mitigate sustainability risks in the supply chain, business partners, on request, disclose information on their supply chains to the Volkswagen Group that are required by the Volkswagen Group to fulfil its legal obligations. The business partners are also obliged to impose a corresponding disclosure obligation on their suppliers, which they in turn are required to pass on to their suppliers.

This may require in particular that business partners disclose their supply chain to the Volkswagen Group up to the material origin (including choke points like smelters and refiners) and provide evidence of management systems or third-party verifications demonstrating processes that prevent or mitigate sustainability risks in the supply chain.

### Raw material supply chains

Due to their significant impact on people and planet, raw material supply chains, in particular, require special due diligence from all actors along the supply chain both in terms of compliance with human rights and protecting the environment.

Therefore, business partners comply in particular with their due diligence obligations as described in the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" regarding relevant raw materials.



## 6. Zahtevi održivosti za odgovorne lance snabdevanja

### Transparentnost

Da bi identifikovali i ublažili rizike održivosti u lancu snabdevanja, poslovni partneri, na zahtev, obelodanjuju Volkswagen Grupi informacije o svojim lancima snabdevanja koje su potrebne Volkswagen Grupi da ispuni svoje zakonske obaveze. Poslovni partneri su takođe dužni da nametnu odgovarajuću obavezu obelodanjivanja podataka svojim dobavljačima, koju su zauzvrat dužni da je prenesu na svoje dobavljače.

Ovo posebno može zahtevati da poslovni partneri obelodane svoj lanac snabdevanja Volkswagen Grupi do porekla materijala (uključujući uska grla kao što su topionice i rafinerije) i da pruže dokaze o sistemima upravljanja ili verifikacijama trećih strana koje pokazuju procese koji sprečavaju ili ublažavaju rizike održivosti u lancu snabdevanja.

### Lanci snabdevanja sirovinama

Zbog svog značajnog uticaja na ljude i planetu, lanci snabdevanja sirovinama posebno zahtevaju posebnu pažnju svih aktera duž lanca snabdevanja, kako u pogledu poštovanja ljudskih prava tako i zaštite životne sredine.

Zbog toga se poslovni partneri posebno pridržavaju svojih obaveza dužne pažnje kao što je opisano u „Smernicama OECD-a o dužnoj pažnji za odgovorne lance snabdevanja mineralima iz područja pogođenih sukobima i područja visokog rizika“ u vezi sa relevantnim sirovinama.

## 7. Verification of compliance with the sustainability requirements by Volkswagen Group

### General information

The Volkswagen Group reserves the right to verify compliance with sustainability requirements regularly, randomly or for specific events and using appropriate and adequate means before awarding a new contract and throughout the business relationship.

This can be done, for example, by means of a risk assessment of the relevant business partner's area of responsibility, a self-assessment by the business partner and/or by deploying experts locally (on-site assessment). An on-site assessment of this nature is only carried out in the presence of representatives of the business partner during regular working hours and in accordance with applicable laws, in particular with regard to data protection. The business partners take appropriate and adequate measures that give the Volkswagen Group the right to carry out similar assessments of their business partners if this is necessary for the fulfillment of legal obligations.

### Assessment prior to entering a contract

If sustainability risks are identified during pre-contractual assessments referred to above may also take place before entering a contract or before awarding a new contract, the resulting measures, if any, shall then be binding on the contract to be concluded. In this case, the business partner is obliged upon entering into the contract to assess any determined or imminent violation of the sustainability requirements in its own business area or in its supply chain within a reasonable period and to remedy any such non-compliance at no additional cost to the Volkswagen Group.

The findings of the pre-contractual assessments for compliance with the sustainability requirements constitute a criterion relevant to the award of contracts.

## 7. Verifikacija usaglašenosti sa zahtevima održivosti od strane Volkswagen Grupe

### Opšte informacije

Volkswagen Grupa zadržava pravo da proverava usklađenost sa zahtevima održivosti redovno, nasumično ili za određene događaje i da koristi odgovarajuća i adekvatna sredstva pre dodele novog ugovora i tokom celog poslovnog odnosa.

Ovo se može uraditi, na primer, procenom rizika u relevantnoj oblasti odgovornosti poslovnog partnera, samoprocenom od strane poslovnog partnera i/ili angažovanjem stručnjaka na lokalnom nivou (procena na licu mesta). Ovakva procena na licu mesta se vrši samo u prisustvu predstavnika poslovnog partnera tokom redovnog radnog vremena i u skladu sa važećim zakonima, posebno u pogledu zaštite podataka. Poslovni partneri preduzimaju odgovarajuće i adekvatne mere koje daju pravo Volkswagen Grupi da izvrši slične procene svojih poslovnih partnera ukoliko je to neophodno za ispunjenje zakonskih obaveza.

### Procena pre sklapanja ugovora

Ako se rizici održivosti identifikuju tokom prethodno navedenih predugovornih procena, koje se mogu desiti pre sklapanja ugovora ili pre dodele novog ugovora, mere koje proizilaze, ako ih ima, tada će biti obavezujuće za ugovor koji treba da se zaključi. U ovom slučaju, poslovni partner je dužan da po sklapanju ugovora proceni svako utvrđeno ili neposredno kršenje zahteva održivosti u svom poslovnom području ili u svom lancu snabdevanja u razumnom roku i da otkloni svaku takvu neusklađenost bez dodatnih troškova za Volkswagen Grupu.

Nalazi predugovornih procena za usaglašenost sa zahtevima održivosti predstavljaju kriterijum relevantan za dodelu ugovora.

### Violation of sustainability requirements by business partners

If a violation of the sustainability requirements by the business partner has occurred or is imminent, the Volkswagen Group is entitled to take prompt and appropriate measures to prevent, stop or minimise the extent of such violation.

The business partner is obligated in this case to take all appropriate measures to prevent, stop or minimise the extent of such violation.

The business partner will participate in one or more training formats of the Volkswagen Group, provided that participation in the training may lead to the termination or minimization of the violation.

If the nature of the violation is such that it cannot be terminated in the foreseeable future, the business partner prepares and implements a plan (including a specific schedule) to stop or minimise the violation without undue delay. If required by law, the Volkswagen Group shall be appropriately involved in the preparation of the plan.

### Violation of sustainability requirements in the business partner's supply chain

If there are material grounds (substantiated information) for believing that a human rights or environmental obligation may have been violated in the upstream supply chain (with direct suppliers of Volkswagen Group), the business partner shall, without undue delay:

1. Participate in a risk analysis by the Volkswagen Group,
2. Embed appropriate prevention measures with respect to respective business partner, and
3. Appropriately support the Volkswagen Group with the preparation and implementation of a plan to prevent, stop or minimise the violation.

### Kršenje zahteva održivosti od strane poslovnih partnera

Ako je došlo do kršenja zahteva za održivost od strane poslovnog partnera ili je ono neminovno, Volkswagen Grupa ima pravo da preduzme brze i odgovarajuće mere da spreči, zaustavi ili umanjí obim takvog kršenja.

Poslovni partner je dužan da u ovom slučaju preduzme sve odgovarajuće mere da spreči, zaustavi ili minimizira obim takvog kršenja.

Poslovni partner će učestvovati u jednom ili više formata obuke Volkswagen Grupe, pod uslovom da učešće u obuci može dovesti do prekida ili minimizacije kršenja.

Ako je priroda prekršaja takva da se ne može prekinuti u doglednoj budućnosti, poslovni partner priprema i sprovodi plan (uključujući određeni raspored) za zaustavljanje ili minimizaciju kršenja bez nepotrebnog odlaganja. Ukoliko to zakon zahteva, Volkswagen Grupa će biti na odgovarajući način uključena u pripremu plana.

### Kršenje zahteva održivosti u lancu snabdevanja poslovnog partnera

Ako postoje materijalni osnovi (potkrepljene informacije) za verovanje, da su ljudska prava ili obaveza zaštite životne sredine možda povređeni u uzvodnom lancu snabdevanja (sa direktnim dobavljačima Volkswagen Grupe), poslovni partner će, bez nepotrebnog odlaganja

1. Učestvovati u analizi rizika od strane Volkswagen Grupe,
2. Ugraditi odgovarajuće mere prevencije u odnosu na dotičnog poslovnog partnera, i
3. Na odgovarajući način podržati Volkswagen Grupu u pripremi i implementaciji plana za sprečavanje, zaustavljanje ili minimizaciju kršenja.

### Other consequences

If a business partner violates or does not comply with the sustainability requirements, the Volkswagen Group reserves the right to take appropriate steps to maintain its rights, such as:

- Requesting implementation of improvement measures
- Verifying highlighted improvements/measures
- Excluding the business partner from new orders and
- Terminating the contract up to extraordinary termination

The Volkswagen Group may waive the exercise of its right of termination if the business partner can credibly affirm and prove that it has immediately initiated countermeasures to prevent future, similar violations.



### Ostale posledice

Ako poslovni partner prekrši ili ne poštuje zahteve održivosti, Volkswagen Grupa zadržava pravo da preduzme odgovarajuće korake za očuvanje svojih prava, kao što su:

- Zahtevanje sprovođenja mera unapređenja,
- Verifikacija istaknutih poboljšanja/mera,
- Isključivanje poslovnog partnera iz novih porudžbina i
- Raskid ugovora do vanrednog raskida.

Volkswagen Grupa može da se odrekne korišćenja svog prava na raskid ako poslovni partner može verodostojno da potvrdi i dokaže da je odmah pokrenuo protivmere da spreči buduća, slična kršenja.

## 8. Reporting Misconduct

### Reporting misconduct

Misconduct must be identified at an early stage, dealt with and remedied without delay in order to protect employees, business partners, third parties and the Volkswagen Group. This means that everyone needs to be aware of all compliance regulations, and pay attention and be ready to point out potential serious violations of the rules in case of concrete evidence.

### Business partner grievance mechanism

Business partners establish a grievance mechanism adequate to their business.

The mechanism allows for concerns related to business ethics, human rights or the environment to be raised by both their own employees as well as other potentially affected people anonymously, confidentially and without fear of retaliation.

Business partners shall not undertake any actions that hinder, block or impede access to the complaints procedure. Business partners undertake to contractually pass on the obligations referred to in the preceding sentence to its suppliers and to ensure, to the extent possible and reasonable, that the obligations are passed on in the supply chain.

#### HINT

The grievance channel should build upon the effectiveness criteria from UN Guiding Principle 31 on Business and Human Rights and cover the company's own operations and the supply chain.

## 8. Prijavljivanje nedoličnog ponašanja

### Prijavljivanje nedoličnog ponašanja

Nedolično ponašanje se mora identifikovati u ranoj fazi, rešavati i otklanjati bez odlaganja kako bi se zaštitili zaposleni, poslovni partneri, treća lica i Volkswagen Grupa. To znači da svi treba da budu upoznati sa svim propisima o usklađenosti, te da obrate pažnju i budu spremni da ukažu na potencijalno ozbiljno kršenje pravila u slučaju konkretnih dokaza.

### Mehanizam žalbe poslovnog partnera

Poslovni partneri uspostavljaju žalbeni mehanizam adekvatan njihovom poslovanju.

Mehanizam omogućava da zabrinutost u vezi sa poslovnim etikom, ljudskim pravima ili životnom sredinom, bude iznesena od strane njihovih zaposlenih kao i od strane drugih, potencijalno pogođenih lica, anonimno, poverljivo i bez straha od odmazde.

Poslovni partneri neće preduzimati nikakve radnje koje ometaju, blokiraju ili onemogućavaju pristup postupku prigovora. Poslovni partneri se obavezuju da će ugovorom preneti obaveze iz prethodne rečenice na svoje dobavljače i obezbediti, u meri u kojoj je to moguće i razumno, da se obaveze prenesu dalje u lancu snabdevanja.

#### HINWEIS

Kanal za žalbe treba da se zasniva na kriterijumima efikasnosti iz UN Vodećeg principa 31 o poslovanju i ljudskim pravima i da pokriva sopstveno poslovanje kompanije i lanac snabdevanja.

## Volkswagen Group Whistleblower System

The Volkswagen Group values confidential, relevant tip-offs from business partners, customers and other third parties.

In the event of specific indications of potential misconduct by employees of the Volkswagen Group, or of the business partner or its business partners in turn in the context of collaboration with the Volkswagen Group, the Volkswagen Group offers all stakeholders the possibility to report such misconduct to the Volkswagen Group Whistleblower System.

All information and contact channels can be found at Whistleblower System ([volkswagenag.com](http://volkswagenag.com)).

Business partners should provide their employees with unhindered access to the Whistleblower System implemented by the Volkswagen Group and not perform any actions that obstruct, block or impede access. Business partners undertake to contractually pass on the obligations referred to in the preceding sentence to its suppliers and to ensure, to the extent possible and reasonable, that the obligations are passed on in the supply chain.

### HINT

The Volkswagen Group Whistleblower System is responsible for disclosures regarding serious regulatory and statutory violations. In the context of a fair and transparent procedure, the Whistleblower System protects the company, the persons implicated and the whistleblowers. The system is based upon uniform, fast processes as well as a confidential and professional system for the investigation of tip-offs by internal experts.

The Volkswagen Group Whistleblower System offers the possibility to consult with lawyers in the Investigation Office via an Internet-based communication platform and to exchange documents and remain in contact using a dedicated mailbox. This is a confidential and secure process. Whistleblowers can decide if they would like to remain anonymous or disclose their name when submitting a report.

External ombudspersons are another point of contact. As lawyers, the ombudspersons are subject to the company's legal duty of confidentiality. In this way we can guarantee the anonymity of whistleblowers vis-à-vis the company should they wish to remain anonymous. The ombudspersons pass on the report to the Volkswagen Group Whistleblower System with the consent of the whistleblower – also in anonymised form if required.

## Sistem za uzbunjivanje Volkswagen Grupe

Volkswagen Grupa ceni poverljive, relevantne dojave poslovnih partnera, kupaca i drugih trećih lica.

U slučaju specifičnih indicija potencijalnog nedoličnog ponašanja od strane zaposlenih u Volkswagen Grupi, ili poslovnog partnera ili njihovih poslovnih partnera, u kontekstu saradnje sa Volkswagen Grupom, Volkswagen Grupa nudi svim zainteresovanim stranama mogućnost da prijave takvo nedolično ponašanje putem sistema za uzbunjivanje Volkswagen Grupe.

Sve informacije i kontakt kanali mogu se naći na Whistleblower System ([volkswagenag.com](http://volkswagenag.com)).

Poslovni partneri treba da obezbede svojim zaposlenima neometan pristup sistemu za uzbunjivanje koji implementira Volkswagen Grupa i da ne preduzimaju nikakve radnje koje sprečavaju, blokiraju ili ometaju pristup. Poslovni partneri se obavezuju da će ugovorom preneti obaveze iz prethodne rečenice na svoje dobavljače i obezbediti, u meri u kojoj je to moguće i razumno, da se obaveze prenesu dalje u lancu snabdevanja.

### NAPOMENA

Sistem za uzbunjivanje Volkswagen Grupe je odgovoran za otkrivanje ozbiljnih kršenja propisa i zakona. U kontekstu poštene i transparentne procedure, sistem za uzbunjivanje štiti kompaniju, umešana lica i uzbunjivače. Sistem se zasniva na jednoobraznim, brzim procesima, kao i na poverljivom i profesionalnom sistemu za ispitivanje dojava od strane internih eksperata.

Sistem za uzbunjivanje Volkswagen Grupe nudi mogućnost konsultovanja sa advokatima u Istražnoj kancelariji preko internet komunikacione platforme i razmene dokumenata i održavanje kontakta koristeći namensko poštansko sanduče. Ovo je poverljiv i bezbedan proces. Uzbunjivači mogu da odluče da li žele da ostanu anonimni ili da otkriju svoje ime prilikom podnošenja prijave.

Spoljni ombudsmeni su još jedna tačka kontakta. Kao advokati, ombudsmeni podležu zakonskoj obavezi kompanije da čuvaju poverljivost. Na ovaj način može se garantovati anonimnost uzbunjivača u odnosu na kompaniju, ukoliko žele da ostanu anonimni. Ombudsmeni prosleđuju izveštaj sistemu za uzbunjivanje Volkswagen Grupe uz saglasnost uzbunjivača – i u anonimnom obliku ako je potrebno.

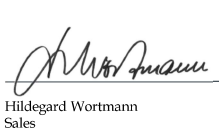
In those cases where obligations have been agreed with the business partner under individual contracts that diverge from the principles in this document, such divergent obligations prevail.  
English language version shall prevail.

U onim slučajevima kada su sa poslovnim partnerom ugovorene obaveze prema pojedinačnim ugovorima koje odstupaju od principa iz ovog dokumenta, prevlađuju te odstupajuće obaveze.  
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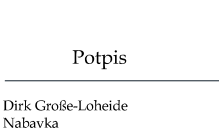
Wolfsburg, January 01<sup>st</sup>, 2023

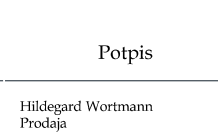
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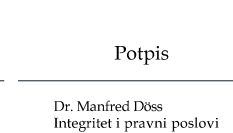
  
Dirk Große-Loheide  
Procurement

  
Hildegard Wortmann  
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Dirk Große-Loheide  
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