



Automobili Lamborghini S.p.A.

"Slavery and Human Trafficking Statement"

(Fiscal Year 2021)

This statement has been prepared pursuant to Section 54 of the United Kingdom Modern Slavery Act 2015. In particular, it details the measures implemented throughout Automobili Lamborghini S.p.A. to prevent forms of modern slavery and human trafficking.

Preamble

In view of advancing globalisation and the increased complexity of our value creation and supply chain, we recognize our global responsibility which includes the human rights protection. For us, this responsibility does not end at our factory gates; but goes beyond them.

1. Organization

Automobili Lamborghini is an Italian Company headquartered in Sant'Agata Bolognese, with the sole shareholder AUDI AG, and it is part of the Volkswagen Group. The Company's purpose is the development, the design, the production and the sales of super sports cars worldwide known for their unique DNA. With 173 Dealers in 52 Countries, Automobili Lamborghini has a balanced distribution of sales in three macro regions as EMEA (Europe, Middle East and Africa), America and Asia-Pacific, each one representing approximately one third of the worldwide sales.

2. Internal measures

Organizational Model pursuant to D. Lgs. No. 231/2001 and Ethic Code

In order to ensure legality, correctness and transparency in the management of its business and its activities, Automobili Lamborghini S.p.A. has adopted an **Organizational and Management Model** according to the Italian Law Decree 231/01¹, and an **Ethic Code**, that is regularly updated based on VW group requirements. The Ethic Code is based on shared values, with a focus on honest conduct, integrity, compliance with all rules, regulations and responsibility. The Organizational Model as well as the Ethic Code apply to all individuals working in the interest of Lamborghini, either inside and outside the Company and are always available to all employees on the Intranet and to the third parties on the Internet.

In particular, the Company has assessed the risk of crimes' commission provided in art. 25 *quinquies* of the 231/01 Decree, that are those that could lead or help the finding of workers in condition of slavery, for example through the human trafficking. Therefore, expected behaviors towards employees and business partners are defined for running business ethically and for avoiding any form of modern slavery.

The Ethic Code seeks to help employees observe the Company's rules at their workplace, as business partners and as members of society, providing them with guidance, assistance and advice. The rejection of all forms of modern slavery and human trafficking likewise forms part of our Ethic Code.

In addition, our activities are guided by the principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the declarations of the International Labour Organization (ILO).

¹ A structured set of rules and procedures in order to prevent the commission of the different type of crimes provided in the Decree 231/01 and considered as relevant for the Company.



Whistleblower System

The Whistleblower System is responsible for receiving and processing reports of serious regulatory violations and/or notices related to the commission of crimes that involve the Company or of behaviour not complying with the rules of conduct and the Ethic Code provisions. Violations of human rights are strong indicators of a serious regulatory violation.

In January 2019, Lamborghini implemented a Whistleblower System Policy, according to the Group requirements, which further developed the whistleblower system, in particular through enhanced communication options.

In case of violation suspect concerning the Ethic Code or any other misconduct in our work environment, those can be reported to the [Group Whistleblower System channels](#)², either providing the name or making it anonymously. The channels are the VW Group Ombudspersons and the Audi Investigation Office of which addresses are available on the Company's web site.

An additional contact point for queries or alerts is the Independent Body³ of Automobili Lamborghini as described on the website.

The main principles of the Whistleblower System are the safeguards of the whistleblower as well as of the concerned person, as the protection of the whistleblower from any discrimination. A potential discrimination is considered a serious regulatory violation and will not be tolerated in any case.

Qualification of employees

The aim of the Company is to give a prompt and precise circulation of the 231/01 Organizational Model and Ethic Code content to every employee and third party that cooperates with Automobili Lamborghini.

Therefore, information disclosure and training to employees at all hierarchical levels play a crucial role within our organization. Starting from mid of 2020, a dedicated Compliance Web Based Training is in place concerning Ethic Code, of which human rights protection topic is part of, as well as the Whistleblower System related topics. Starting in 2022 a refresher training on Ethic Code has also been introduced for all employees.

Training on the Ethic Code is mandatory for all employees, regardless of hierarchical level. Additionally, members of the senior management confirm their knowledge and responsibility with regard to the Ethic Code each year, by signing an own declaration.

Target group-oriented communication and training measures for employees at all hierarchical levels play a key role in this. In the reporting period, specific communication and training activities continued to focus primarily on the Ethic Code, the whistleblower system and the prevention of corruption.

For all the third parties who have business relations with the Company and/or act on behalf of Lamborghini, relevant compliance clauses in relation to the Organizational Model 231/01 and the Ethic Code are present in all their respective contracts.

Risk analysis

The regular risk management process includes a quarterly risk process and the annual ICS process. Risk assessments pertaining to human rights are conducted by internal key divisions, including the updates of the countermeasures taken. The annual process supports the recording process of potential risks by means of a list of focus areas, which also includes potential risks arising from the violation of human rights. On regular basis, risk management reports are submitted to the local and Group Management.

Measures in the supply chain: Sustainability requirements for our Business Partners

In order to maximize the benefit of potential synergies, we select suppliers in close consultation with Volkswagen Group Procurement. All measures and efforts taken by the Volkswagen Group in promoting sustainability in the

² For additional info please refer to Automobili Lamborghini S.p.A. Ethic Code Chapter 7 - Support (Help/Contacts/Whistleblower System).

³ Please note that according to the Group Whistleblower Policy, all hints with suspicion of serious regulatory violation committed by the employees of Automobili Lamborghini will be immediately forwarded to Audi Investigation Office.



supply chain, as well as to safeguard and respect human rights, also contribute to achieve Automobili Lamborghini goals, in addition to the independent activities undertaken.

Although each Business Partner has its own responsibility for running its business ethically, Automobili Lamborghini does not tolerate any form of modern slavery in its activities or supply chains. Additionally, to complying with the principles of the Ethic Code, the Company acknowledges completely the Volkswagen Group requirements in terms of sustainability (i.e. [Volkswagen Group requirements regarding sustainability in its relationships with business partners](#) and the [Code of Conduct for Business Partners](#)), of which reference is present in the nomination agreement, in the contracts and in the related purchase orders of parts and general purchases.

This commitment describes the expected conduct of the Business Partners with respect to key environmental, social and compliance standards. Internationally acknowledged human rights are included in these standards which can be consulted on the website page: www.vwgroupsupply.com.

A key measure introduced in 2019 is the sustainability rating (S-Rating), which is now fully integrated according to the Group Roll-out plan. S-Rating indicates relevant⁴ suppliers' sustainability performance and opportunities for continuous improvement. It evaluates the ecological performance of suppliers as well as their social sustainability and integrity. The S-Rating is of direct relevance to our direct suppliers in terms of contract awards. If a supplier does not meet our requirements for compliance with sustainability standards, they will not be awarded contracts according to Group rules. This is a direct incentive for suppliers to improve their sustainability performance. Sustainability is an established part of the competence profile for all Procurement employees. At this regard, the buyers are trained regularly (last training April 2021). Also relevant and new suppliers have been trained or have the possibility to attend the training sessions organized by the Group.

In case Automobili Lamborghini S.p.A. becomes aware of sustainability violations at or by business partners, those have to be submitted to "Procurement Strategy" (I/BB) at s-rating@audi.de.

Moreover, before undertaking business relationships with Business Partners, the Company follows a pre-qualification process based on a constructed method taking into account data provided by the Partner, either through a verification tool based on the peculiarity of the market where the Partner operates or based on risk-oriented manner. The Business Partners acknowledge that the Company has adopted an Organizational Model pursuant to the Decree 231/01 as well as an Ethic Code ensuring the refrain to undertake any act contrary to the freedom or the dignity of a human being, whose protection is a fundamental value of the Company. Furthermore, for specific clusters of Business Partners, integrity checks are conducted through BPDD tool that ensures the Business Partner Due Diligence Process.

Outlook

Our Company will continue to guarantee the same intolerance as regards to human rights violations by updating its internal rules and risks' analysis and continuing to raise awareness among its employees and its Business Partners about the non-acceptance of any forms of modern slavery and human trafficking as examples of human rights' abuses. In order to confirm the Automobili Lamborghini's commitment to respect and observe human rights in general and to condemn forced labor and human trafficking in particular, the Company acknowledges the importance to disclose the principles of the Ethic Code to all individuals that act for Lamborghini whether they are employees or third parties.

⁴ The relevance of a business partner for the S-Rating comes from factors such as company size or risk exposure, which is derived from the type of service.



Automobili Lamborghini S.p.A.
July 2022

A handwritten signature in black ink, appearing to read "St. Winkelmann", written over a horizontal line.

Stephan Winkelmann

Chairman & Chief Executive Officer of Automobili Lamborghini S.p.A.

A handwritten signature in black ink, appearing to read "P. Poma", written over a horizontal line.

Paolo Poma

Managing Director & CFO of Automobili Lamborghini S.p.A.