

VOLKSWAGEN

AKTIENGESELLSCHAFT



Code of Conduct for Business Partners

Volkswagen Group requirements regarding sustainability in its relationships with business partners

Kodeks poslovne etike za poslovne partnerje

Zahteve Volkswagen Group glede trajnosti v odnosih s poslovnimi partnerji

Content

Preamble	4
1. Objectives and scope	6
2. Fundamental sustainability requirements	8
3. Sustainability requirements in environmental protection	14
4. Sustainability requirements in the area of human rights and employment law of employees	22
5. Sustainability requirements for business ethics	34
6. Sustainability requirements for responsible supply chains	38
7. Verification of compliance with the sustainability requirements by Volkswagen Group	40
8. Reporting Misconduct	46

Vsebina

Preambula	5
1. Cilji in področje veljavnosti	7
2. Osnovne zahteve glede trajnosti	9
3. Zahteve glede trajnosti na področju varstva okolja	15
4. Zahteve glede trajnosti na področju človekovih pravic in delovnih pravic zaposlenih	23
5. Zahteve glede trajnosti in poslovna etika	35
6. Zahteve glede trajnosti in odgovorne dobavne verige	39
7. Preverjanje skladnosti z zahtevami glede trajnosti s strani Volkswagen Group	41
8. Prijava kršitev	47

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 partnerji Volkswagen Group odločilno vplivajo na njegovo poslovno uspešnost. Partnerstvo prinaša trajne poslovne odnose, ki so obojestransko koristni. Zato je Volkswagen Group usmerjen v tesno sodelovanje s svojimi poslovnimi partnerji.

Pri spoštovanju zahtev glede trajnosti se Volkswagen Group zaveda odgovornosti za gospodarski, ekološki in socialni vpliv svojih dejanj.

To koncern pričakuje tudi od svojih poslovnih partnerjev in jih pri izvajanju teh zahtev podpira. V smislu partnerstva in sodelovanja koncern svojim poslovnim partnerjem nudi širok nabor praktično usmerjenih usposabljanj, pobud in drugih virov informacij. Priporoča se, da vsi poslovni partnerji izkoristijo ponujeni nabor in vire informacij.

Zahteve v nadaljevanju opredeljujejo pričakovanja Volkswagen Group glede miselnosti in ravnanja poslovnih partnerjev pri njihovih poslovnih dejavnostih in so temelj uspešnih in odgovornih poslovnih odnosov.

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. Cilji in področje veljavnosti

V tem Kodeksu poslovne etike za poslovne partnerje (v nadaljevanju »Kodeks poslovne etike«) je Volkswagen Group opredelil svoja prizadevanja, zahteve in pričakovanja do poslovnih partnerjev družb Volkswagen Group na področju trajnosti (v nadaljevanju »zahteve glede trajnosti«).

Trajnost pomeni tako spoštovanje človekovih pravic in varstvo okolja, etično in pravno neoporečno poslovanje kot tudi odgovorno nabavo surovin.

V nadaljevanju je za družbo Volkswagen Group, ki uporablja ta Kodeks poslovne etike, uporabljen splošen izraz »Volkswagen Group«.

Kodeks poslovne etike je zavezujoče narave za vse dobavitelje, prodajne partnerje in vse ostale poslovne partnerje B2B (v nadaljevanju »poslovni partnerji«) Volkswagen Group, ki imajo poslovni odnos s Volkswagen Group.

Poslovni partnerji se zavezujejo, da bodo zahteve glede trajnosti prenesli na tiste poslovne partnerje (predvsem dobavitelje), ki vplivajo na pogodbeno razmerje s Volkswagen Group, in da bodo v okviru svojih zmožnosti in razumnih možnosti zagotovili,

da se zahteve glede trajnosti prenesejo vzdolž celotne dobavne verige. Poslovni partnerji vzpostavijo ustrezne nadzorne ukrepe za preverjanje posredovanih zahtev glede trajnosti.

V kolikor so bile s poslovnim partnerjem z ločenimi pogodbami dogovorjene obveznosti, ki odstopajo od načel tega dokumenta, prevladajo te odstopajoče obveznosti.

Zahteve glede trajnosti med drugim temeljijo na desetih načelih globalnega dogovora UN, vodilnih načelih UN o poslovanju in človekovih pravicah, smernicah OECD za večnacionalne družbe, smernicah OECD o potrebni skrbnosti za odgovorne oskrbovalne verige z minerali s konfliktnih območij in območij z visokim tveganjem, konvencijah Mednarodne organizacije dela (MOD), zlasti o temeljnih pravicah pri delu, ter na vodilnih načelih pobude Drive Sustainability.

Poleg tega ta Kodeks poslovne etike temelji na nacionalno in mednarodno priznanih standardih, kot sta Splošna deklaracija o človekovih pravicah, kot je določena zlasti v Mednarodnem paktu o državljanskih in političnih pravicah (ICCPR) ter Mednarodnem paktu o ekonomskih, socialnih in kulturnih pravicah.

2. Fundamental sustainability requirements

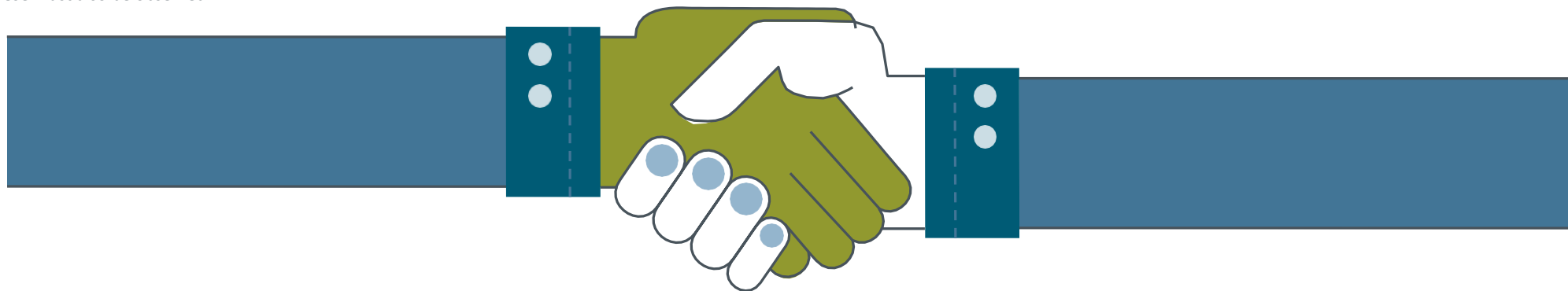
General information

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.



2. Osnovne zahteve glede trajnosti

Splošno

Za Volkswagen Group je upoštevanje zahtev glede trajnosti bistven element njegovih poslovnih razmerij.

Volkswagen Group pričakuje, da bo vrednote, povezane s temi zahtevami glede trajnosti, poslovni partner s strukturiranim in kompetentnim upravljanjem vključil v vsakodnevno poslovanje. Vodje pri poslovnih partnerjih morajo opredeliti in oceniti pravne in druge zahteve ter usposobiti zaposlene, da bi zagotovili skladnosti s temi zahtevami.

Poslovni partnerji morajo vedno upoštevati veljavno zakonodajo. Če te zahteve glede trajnosti presegajo zahteve veljavne zakonodaje, jih je treba dodatno upoštevati.

Obvezne zahteve iz Kodeksa poslovne etike dopolnjujejo dodatna priporočila in napotke v ločenih besedilnih poljih.

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.

Vzpostavitev in uporaba sistemov upravljanja

Pričakuje se, da so poslovni partnerji, ki imajo proizvodne lokacije z več kot 100 zaposlenimi, za te lokacije pridobili certifikat v skladu z mednarodnim standardom ISO 14001 ali uredbo Evropske unije o sistemu EMAS.

Poslovni partnerji, ki imajo proizvodne lokacije z več kot 1.000 zaposlenimi, morajo za te lokacije dodatno pridobiti certifikat v skladu z mednarodnim standardom ISO 45001 ali primerljivim standardom.

NAPOTEK

Za prodajne partnerje z več kot 100 zaposlenimi se prav tako priporoča, da imajo mednarodni standard ISO 14001 oziroma delujejo v skladu z njim.

Pričakuje se, da poslovni partnerji z manj kot 1.000 zaposlenimi na svojih lokacijah vzpostavijo interne sisteme upravljanja ali, v kolikor je izvedljivo, pridobijo nacionalne/panožne certifikate.

Za prodajne partnerje z delavnicami se priporoča tudi, da imajo mednarodni standard ISO 45001 oziroma delujejo v skladu z njim.

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](https://www.vwgroupsupply.com/training)). 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.

Pravilniki

Poslovni partnerji pripravijo pravilnik (npr. Kodeks poslovne etike), v katerem je opredeljena njihova zavezanost socialnim, etičnim in okoljskim standardom. Tak pravilnik je napisan v jezikih, ki jih razumejo zaposleni na lokacijah.

Odgovorna oseba za trajnostni razvoj

Pričakuje se, da poslovni partnerji imenujejo odgovorno osebo za trajnostni razvoj ali podobnega pooblaščenca, ki poroča vodstvu ustreznega poslovnega partnerja. Pooblaščenec je odgovoren za razvoj ciljev in ukrepov glede trajnosti v podjetju.

Usposabljanja

Volkswagen Group svojim poslovnim partnerjem v prizadevanjih za izpolnjevanje zahtev glede trajnosti brezplačno nudi različne oblike usposabljanj ([Usposabljanje in dialog vwgroupsupply.com](https://www.vwgroupsupply.com/training)). Udeležba na teh usposabljanjih je za poslovne partnerje glede na rezultat predhodno opravljene analize tveganj obvezna. Poslovnim partnerjem se ni potrebno udeležiti obveznega usposabljanja, če predložijo dokazilo o udeležbi na podobnem usposabljanju, ki ga izvaja tretji ponudnik.

NAPOTEK

Priporoča se, da poslovni partnerji razvijejo svoje programe usposabljanja za izboljšanje opredelitve smernic, izvajanje procesov in sporočanje svojim zaposlenim, kaj se od njih pričakuje. Poslovni partnerji bi morali svojim zaposlenim zagotavljati stalno dodatno usposabljanje.

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/en/environment)).

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 CO²-neutral economy by 2050.

3. Zahteve glede trajnosti na področju varstva okolja

Poslovni partnerji morajo poznati in upoštevati okoljsko politiko Volkswagen Group, ki je zapisana v dokumentu Environmental Policy Statement Volkswagen Group ([Okolje vwgroupsupply.com](https://www.vwgroupsupply.com/en/environment)).

Emisije toplogrednih plinov

Poslovni partnerji sprejmejo ustrezne ukrepe za zmanjšanje emisij v zrak, ki predstavljajo tveganje za okolje in zdravje, vključno z emisijami toplogrednih plinov. Da bi izboljšali okoljsko sprejemljivost produktov in storitev, poslovni partnerji proaktivno zmanjšujejo emisije toplogrednih plinov vzdolž celotne dobavne verige, denimo z večjo uporabo ogljično nevtralnih virov energije.

Poslovni partnerji, ki Volkswagen Group dobavljajo produkte, mu morajo na zahtevo posredovati podatke o skupni porabi energije v MWh in emisijah CO₂ v tonah (obseg 1, 2 in 3) na ravni produkta, da lahko koncern izboljša kazalnike okoljske učinkovitosti svojih produktov.

Napotek

Svojim poslovnim partnerjem priporočamo, da si zastavijo na znanosti temelječe in časovno omejene cilje za zmanjšanje emisij in uporabo energije iz obnovljivih virov, ki so usklajeni s Pariškim sporazumom, ter sprejmejo ukrepe, ki prispevajo k razogljičenju vzdolž celotne razvojne verige.

Svojim poslovnim partnerjem tudi priporočamo, da se zavežejo k Pariškemu sporazumu in si prizadevajo za ogljično nevtralnost do leta 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.

Učinkovita raba virov

Poslovni partnerji sprejmejo ustrezne ukrepe za zagotovitev učinkovite rabe energije, vode in surovin, uporabe obnovljivih virov ter zmanjšanje škode za okolje in zdravje.

Registracija, vrednotenje in omejitev uporabe snovi in surovin

Poslovni partnerji v okviru ustrezne veljavne zakonodaje in ob upoštevanju ustreznih veljavnih predpisov Volkswagen Group sprejmejo ustrezne ukrepe, s katerimi preprečijo uporabo snovi in materialov s škodljivim vplivom na okolje ali zdravje (npr. rakotvorne, mutagene, za razmnoževanje strupene snovi).

Poslovni partnerji so dolžni izpolnjevati zahteve mednarodnih konvencij in drugih pravnih instrumentov, ki se nanašajo na proizvodnjo in uporabo določenih snovi, ravnanje z njimi

in njihovo odlaganje (zlasti Konvencije Minamata o živem srebru z dne 10. oktobra 2013 in Stockholmske konvencije o obstojnih organskih onesnaževalih (POP) z dne 23. maja 2001), ter ustrezna veljavna izvedbena pravila na nacionalni in nadnacionalni ravni.

Kar zadeva talilnice ali rafinerije kositra, volframa, tantala in zlata, smejo poslovni partnerji uporabljati samo tiste surovine, ki izpolnjujejo zahteve iz »Smernic OECD o potrebni skrbnosti za odgovorne verige oskrbovanja z minerali z območij, prizadetih zaradi konfliktov, in območij z visokim tveganjem« ter jih je preverila pobuda za odgovorne minerale (Responsible Mineral Initiative) ali podobne organizacije.

Poslovni partnerji sprejmejo ustrezne in razumne ukrepe, s katerimi iz svojih dobavnih verig izločijo surovine, pridobljene z globokomorskim rudarjenjem.

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.

Krožno gospodarstvo in ravnanje z odpadki

Poslovni partnerji sprejmejo ustrezne in razumne ukrepe za preprečevanje nastajanja odpadkov, ponovno uporabo virov, recikliranje ter varno in okolju prijazno odstranjevanje ostalih odpadkov, kemikalij in odpadne vode. Tovrstni ukrepi se lahko sprejmejo zlasti med razvojem, proizvodnjo, življenjsko dobo produkta in recikliranjem ob koncu življenjske dobe, pa tudi med drugimi dejavnostmi. Pri tem morajo poslovni partnerji upoštevati tudi mednarodne konvencije o čezmejnem transportu nevarnih odpadkov, zlasti Baselsko konvencijo o nadzoru prehoda nevarnih odpadkov preko meja in njihovega odstranjevanja z dne 22. marca 1989, ter ustrezna veljavna izvedbena pravila na nacionalni in nadnacionalni ravni.

NAPOTEK

Poslovnim partnerjem se priporoča, da pri svojih procesih uporabljajo sekundarne materiale, če je to tehnično izvedljivo in ekonomsko upravičeno. Poslovni partnerji morajo biti seznanjeni z deležem reciklirane vsebine v svojih produktih in morajo ta podatek posredovati Volkswagen Group na njegovo zahtevo.

Poslovni partnerji si morajo poleg upoštevanja teh načel prizadevati tudi za vzpostavitev in spodbujanje sistemov zaprtega kroga.

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.

Ravnanje z vodo

Poslovni partnerji sprejmejo ustrezne in razumne ukrepe za zmanjšanje porabe vode na svojih lokacijah oziroma vzdolž svojih dobavnih verig, pri čemer morejo dati prednost regijam, kjer prihaja do pomanjkanja vode. Pravico do vode je treba vedno spoštovati.

Poslovni partnerji, ki Volkswagen Group dobavljajo produkte, morajo Volkswagen Group na njegovo zahtevo posredovati podatke o skupni porabi sveže vode na ravni produkta.

NAPOTEK

Ustrezni ukrepi so lahko predvsem takšni, ki učinkovito zmanjšujejo porabo vode, vodo ponovno uporabljajo in reciklirajo ter odgovorno in učinkovito čistijo odpadno vodo, da se zaščiti okolje in izboljša splošna kakovost vode.

Poslovni partnerji si v svojem okolju prav tako prizadevajo zagotavljati, da imajo vsi posamezniki dostop do varne, sprejemljive in cenovno dostopne vode v zadostnih količinah za osebno uporabo.

Biotska raznovrstnost

Zagotoviti je treba zaščito naravnih ekosistemov, predvsem zaščito ogroženih habitatov divjih živali, in trajnostno rabo naravnih virov.

Poslovni partnerji si morajo v okviru veljavne zakonodaje in mednarodnih predpisov o biotski raznovrstnosti prizadevati za dobavne verige, kjer ne prihaja do krčenja in degradacije gozdov. Ti mednarodni predpisi so na primer resolucije in priporočila Centra za biotsko raznovrstnost (CBD) in Svetovne zveze za varstvo narave (IUCN).

Etično ravnanje z živalmi

Poslovni partnerji podpirajo in si prizadevajo za etično in humano ravnanje z živalmi.

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. Zahteve glede trajnosti na področju človekovih pravic in delovnih pravic zaposlenih

Poslovni partnerji so dolžni spoštovati konvencije ILO v njihovi veljavni različici, predvsem temeljne pravice pri delu.

Odprava dela otrok in zaščita mladih delavcev

Poslovni partnerji morajo pri svojih dejavnostih in v svojih dobavnih verigah upoštevati najnižjo starost svojih zaposlenih. Zagotoviti morajo, da je najnižja zaposlitvena starost v skladu z veljavno zakonodajo in standardi MOD ter da ne prihaja do prepovedanega dela otrok.

Brez sodobnega suženjstva, trgovine z ljudmi in neetičnega zaposlovanja

Poslovni partnerji morajo sprejeti ustrezne in razumne ukrepe za preprečevanje zasužnjevanja zaradi dolgov, prisilnega ali obveznega dela ter vseh oblik sodobnega suženjstva in trgovine z ljudmi pri poslovanju oziroma vzdolž dobavne verige. Poslovni partnerji zagotovijo, da se delovna razmerja sklepajo prostovoljno,

zaposleni pa jih lahko prekinejo po lastni presoji in v razumnem odpovednem roku. Zaposleni pri poslovnih partnerjih ob zaposlitvi prejmejo pogodbo, ki je v skladu z veljavno zakonodajo, je pripravljena v ustrezno dokumentirani obliki (npr. v pisni ali elektronski obliki), je napisana v jeziku, ki ga razumejo, ter resnično in jasno opredeljuje njihove pravice in obveznosti.

Poslovni partnerji ne smejo zavajati potencialnih zaposlenih glede narave dela, zaposlenim zaračunavati pristojbin za zaposlovanje ali nerazumnih transportnih stroškov ali jim zaseči, uničiti, skriti oziroma onemogočiti dostop do potnih listov ali drugih uradnih identifikacijskih dokumentov, ali omejiti svobode gibanja zaposlenih ali zahtevati, da zaposleni brez poslovnega razloga neprostovoljno uporabljajo nastanitve, ki jim jih zagotovi podjetje.

Zaščita telesne integritete, brez fizičnega kaznovanja

Poslovni partnerji spoštujejo varstvo telesne integritete in sprejemajo ustrezne ukrepe, da zagotovijo upoštevanje te zakonsko zaščitene pravice. Poslovni partnerji v

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.

svojih poslovnih področjih in vzdolž dobavne verige zagotavljajo, da je izključena vsakršna vpletenost, vključno s soudeležbo ali sodelovanjem pri ugrabitvah, mučenju, ubijanju ali podobnih dejanjih, in da se v okviru disciplinskih ukrepov ne uporablja nikakršno telesno kaznovanje. Poleg tega poslovni partnerji na svojih poslovnih področjih in vzdolž dobavne verige zagotavljajo, da ne prihaja do drugih hudih kršitev ali zlorabe človekovih pravic, kot so denimo spolno nasilje, vojni zločini in druge hude kršitve mednarodnega humanitarnega prava, zločini proti človeštvu ali genocid.

Plačila in prejemki

Poslovni partnerji zaposlenim plačujejo ustrezno plačilo. Ustrezno plačilo je najmanj zakonsko določena minimalna plača, ki se izračuna na podlagi zakonodaje lokacije zaposlitve. Ta plača mora, kolikor je mogoče, pokrivati vsaj osnovne potrebe zaposlenih in zagotavljati ustrezen življenjski standard za zaposlene in njihove družine (dostojna plača). Poslovni partnerji so dolžni zaposlene plačevati neposredno, v celoti in pravočasno.

Zdravje in varnost na delovnem mestu, požarna varnost

Poslovni partnerji morajo upoštevati veljavno zakonodajo s področja varstva pri delu, varovanja zdravja in požarne varnosti. Poslovni partnerji vzpostavijo postopek, ki prispeva k stalnemu zmanjševanju tveganj za zdravje in varnost pri delu ter k izboljšanju zdravja in varnosti na delovnem mestu in varstva pred požari. Ukrepi za varnost in zdravje na delovnem mestu ne smejo biti povezani s stroški za zaposlene.

Poslovni partnerji:

- V ustreznem jeziku obveščajo svoje zaposlene o ugotovljenih nevarnostih in s tem povezanih preventivnih in korektivnih ukrepih za zmanjšanje tveganj.
- Izvajajo ustrezne ukrepe za izobraževanje o preprečevanju bolezni, povezanih z delom, preprečevanju nesreč pri delu, prvi pomoči, ravnanju s kemikalijami in požarni varnosti.
- Brezplačno zagotovijo primerno zaščitno opremo in zaščitna oblačila.

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.



- Sprejmejo ustrezne protipožarne ukrepe (tehnične, strukturne oziroma organizacijske) za zmanjšanje škode v primeru požara.
 - Spremljajo in obravnavajo nevarnosti, ki so povezane z zdravjem in varnostjo (na primer kemične, biološke, fizikalne in fiziološke nevarnosti) ter ustrezne varnostne ukrepe.
 - Kemikalije, ki se uporabljajo, označijo v skladu z globalno usklajenim sistemom za razvrščanje in označevanje kemikalij (GHS) ali z uredbo o razvrščanju, pakiranju in označevanju nevarnih kemikalij v evropskih državah (CLP). Kemikalije se skladiščijo, prevažajo in obravnavajo v skladu z veljavnimi zakonskimi in pogodbenimi zahtevami.
 - Razvijejo ustrezne načrte za nujne primere ter zagotovijo ustrezno prvo pomoč, požarno varnost in zdravniško pomoč, material in ustrezna prevozna sredstva za nadaljnje obravnave.
 - Zagotovijo ustrezno število izhodov v sili, evakuacijskih poti in zbirnih mest v sili, ki so označeni z zadostnim številom znakov.
- V primeru nezgode je treba zagotoviti prvo pomoč in zdravstveno oskrbo.

V primeru nevarnosti za zdravje, kot so pandemije, poslovni partnerji sprejmejo vse potrebne ukrepe za zaščito svojih zaposlenih in družbe. Vse ukrepe lokalnih organov je treba v celoti spoštovati in upoštevati.

Delovni čas

Poslovni partnerji morajo zagotoviti, da je delovni čas v skladu z veljavnimi nacionalnimi zakonskimi zahtevami oziroma nacionalnimi zahtevami, ki veljajo v zadevni gospodarski panogi.

Delovne in bivanjske razmere

Poslovni partnerji svojim zaposlenim zagotovijo stranišča in dostop do pitne vode. Vsi prostori za uživanje in pripravo ter za shranjevanje hrane izpolnjujejo veljavne standarde higiene. Če je zaradi narave dela potrebno zagotoviti ustrezne spalne prostore za zaposlene, mora biti poskrbljeno za dovolj prostora, čistočo in varnost. Dostop se ne sme neprimerno omejevati.

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.

Brez škodljivega vpliva na zemljo, vodo in zrak

Poslovni partnerji zagotovijo, da ne vplivajo na škodljiv način na spremembe tal, onesnaževanje vode, onesnaževanje zraka, ne povzročajo škodljivih emisij hrupa in prekomerno ne porabljajo vode, saj bi to lahko povzročilo znatno poslabšanje naravnih pogojev za pridelavo hrane in pitno vodo ali zdravje ljudi.

Brez prisilnih izselitev

Poslovni partnerji pri pridobivanju, gradnji ali drugi uporabi zemljišč, gozdov in voda upoštevajo prepoved nezakonitih izselitev in prepoved nezakonitega odvzema zemljišč, gozdov in voda.

Zagovorniki človekovih pravic

Poslovni partnerji ne dopuščajo in ne izvajajo nikakršne oblike groženj, ustrahovanja ali nasilja zoper zagovornike človekovih pravic ali okoljske aktiviste, vključno s tistimi, ki uveljavljajo svoje pravice do svobode izražanja, združevanja, mirnega zbiranja in protestiranja zoper poslovne dejavnosti poslovnih partnerjev. Zagotavljajo jim dostop do svojih kanalov za poročanje o kršitvah, ne da bi jim grozili povračilni ukrepi oziroma bi bili takšnih ukrepov deležni.

Svoboda združevanja in kolektivna pogajanja

Poslovni partnerji priznavajo pravico vseh zaposlenih do ustanavljanja sindikatov in predstavništev zaposlenih ter včlanjevanja vanje. V zvezi s tem se poslovni partnerji zavezujejo k ohranjanju načela nevtralnosti.

To izključuje vsakršno obliko diskriminacije ali povračilnih ukrepov zaradi dejavnosti sindikatov. Poslovni partnerji priznavajo pravico do kolektivnih pogajanj in pravico sindikatov, da delujejo svobodno in v skladu z zakonodajo kraja zaposlitve. Ta pravica vključuje tudi pravico do stavanja in pravico do kolektivnih pogajanj.

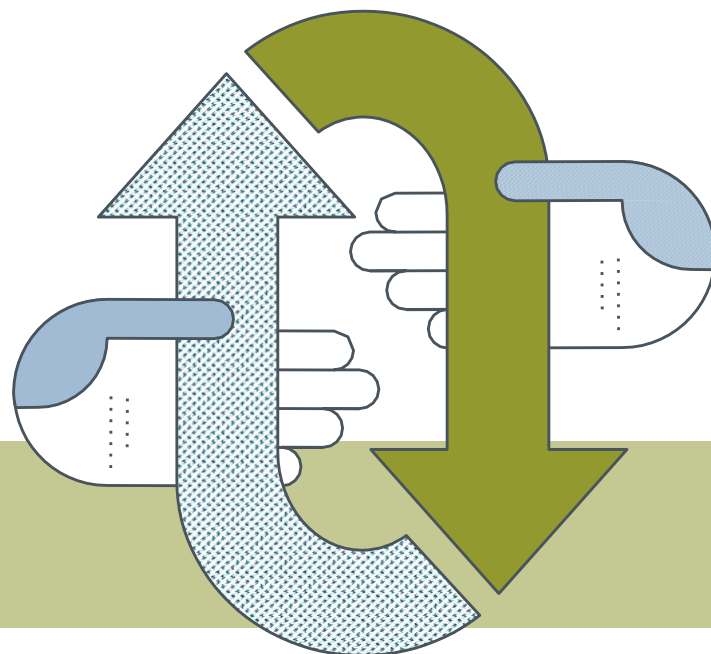
NAPOTEK

Če je ta pravica omejena z veljavnimi zakoni, je treba spodbujati alternativne in zakonite načine za vzpostavitev zastopanja zaposlenih.

Poslovni partnerji spodbujajo socialni in družbeni dialog, po možnosti na podlagi kolektivnih pogajanj, da lahko zagotovijo human delovni čas, ki omogoča zdravo delo.

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.



Brez diskriminacije in brez nadlegovanja

Poslovni partnerji zagotavljajo, da se v delovnem okolju preprečujejo vsakršne oblike diskriminacije, ustrahovanja, nadlegovanja ali neupravičenega zapostavljanja zaposlenih. Prepovedana je zlasti diskriminacija na podlagi etničnega ali socialnega porekla, barve kože, spola, državljanstva, jezika, vere, fizičnih ali duševnih omejitev, spolne identitete, spolne usmerjenosti, zdravstvenega stanja, starosti, zakonskega stanu, nosečnosti/starševstva, članstva v sindikatu ali političnega prepričanja, če slednje temelji na demokratičnih načelih in strpnosti do drugače mislečih, razen če je to upravičeno na podlagi zahtev zaposlitve. Neenako obravnavanje vključuje zlasti neenako plačilo za enako delo.

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.

Varnostne sile

Poslovni partnerji zagotavljajo, da angažiranje varnostnih sil oziroma njihovo ukrepanje ne vodi do kršitev človekovih pravic. Poslovni partnerji zagotavljajo, da neposredno ali posredno ne prispevajo k podpiranju javnih ali zasebnih varnostnih sil, ki nezakonito izvajajo nadzor nad rudniki, transportnimi potmi in subjekti na začetku dobavne verige.

NAPOTEK

Poslovni partnerji bi morali izvajati »Prostovoljna načela o varnosti in človekovih pravicah«, kjer je ustrezno.

Manjšine, ranljive skupine in avtohtono prebivalstvo

Poslovni partnerji spoštujejo pravice manjšin, ranljivih skupin in lokalnih skupnosti do dostojnih življenjskih pogojev.

Raznolikost in vključevanje

Poslovni partnerji morajo razvijati in spodbujati vključujočo kulturo, v kateri je raznolikost cenjena. Med vsemi zaposlenimi in na vseh ravneh hierarhije se spodbuja raznolikost, med drugim zlasti kulturna, etnična in verska raznolikost.

Poslovni partnerji morajo zagotoviti, da lahko vsi zaposleni v celoti prispevajo in izkoristijo svoj potencial ter vzpostavijo zdravo ravnovesje med poklicnim in zasebnim življenjem.

Poslovni partnerji se spodbujajo, naj krepijo sodelovanje z različnimi poslovnimi partnerji, ki jih vodijo ali imajo v lasti ženske ali predstavniki manjšin.

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. Zahteve glede trajnosti in poslovna etika

Poslovni partnerji morajo zmeraj ravnati pošteno in v primeru ugotovljenih kršitev sprejeti ustrezne in razumne ukrepe za njihovo odpravljanje.

Izogibanje nasprotjem interesov

Poslovni partnerji sprejemajo odločitve zgolj na podlagi objektivnih meril, na katera ne smejo vplivati drugi interesi ali odnosi.

Prepoved korupcije

Poslovni partnerji zavračajo in preprečujejo vse oblike korupcije, vključno s t.i. podmazovanjem (plačili za pospeševanje rednih nalog uradnikov). Poslovni partnerji zagotavljajo, da njihovi zaposleni, podizvajalci in zastopniki ne dajejo ali ponujajo podkupnin, plačil za pospeševanje rednih nalog, neprimernih donacij ali drugih neprimernih plačil uradnikom in drugim tretjim osebam oziroma jih od njih ne sprejemajo.

Svobodna konkurenca

Poslovni partnerji spoštujejo pošteno in svobodno konkurenco ter veljavne zakone s področja konkurence in kartelnega prava. Še posebej ne sklepajo protikonkurenčnih dogovorov ali sporazumov s konkurenti, dobavitelji, strankami ali tretjimi osebami in ne zlorablajo morebitnega prevladujočega tržnega položaja. Poslovni partnerji zagotavljajo, da na njihovem poslovnem področju ne prihaja do izmenjave informacij, občutljivih z vidika konkurence, ali kakršnega koli drugega vedenja, ki omejuje ali bi lahko na neprimeren način omejevalo konkurenco.

Nadzor uvoza in izvoza

Poslovni partnerji dosledno upoštevajo vso veljavno zakonodajo za uvoz in izvoz blaga, storitev in informacij. Poleg tega upoštevajo veljavne sezname oseb, skupin in subjektov, za katere veljajo sankcije.

Poslovni partnerji zagotavljajo, da so vsi davki, dajatve in licenčnine, obračunani v zvezi s pridobivanjem, trgovanjem in izvozom mineralov z območij, prizadetih zaradi konfliktov, in območij z visokim tveganjem, plačani v skladu z veljavno zakonodajo.

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 does contribute 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.

Prepared pranja denarja

Poslovni partnerji v okviru svojih poslovnih dejavnosti zagotavljajo skladnost z veljavnimi zakonskimi določbami zoper pranje denarja.

Pravica intelektualne lastnine

Poslovni partnerji spoštujejo pravice intelektualne lastnine in varujejo ustrezne podatke.

Varovanje zaupnih informacij

Poslovni partnerji zagotavljajo, da se podatki, ki jih je treba varovati (poslovne skrivnosti in osebni podatki), zbirajo, obdelujejo, varujejo in brišejo ustrezno in v skladu z zakonodajo. Poslovni partnerji ustrezno zavežejo tudi svoje zaposlene. Podatkov, ki jih je treba varovati, brez dovoljenja ni dovoljeno posredovati tretjim osebam ali objaviti v kakršni koli drugi obliki, v zvezi s tem pa je treba sprejeti zaščitne ukrepe.

Uporaba umetne inteligence

Varstvo osebnih podatkov in varnost podatkov sta osnovna pogoja za uporabo umetne inteligence. Poslovni partnerji zagotovijo, da je ves razvoj, ki temelji na umetni inteligenci, v skladu z veljavnimi zakoni in predpisi.

Sistemi umetne inteligence morajo biti vedno zasnovani tako, da so zanesljivi in niso diskriminatorni. Aplikacije umetne inteligence vedno nadzoruje človek.

Brez podpiranja oboroženih skupin

Poslovni partnerji zagotavljajo, da njihove poslovne dejavnosti neposredno ali posredno ne podpirajo nedržavnih oboroženih skupin.

Razkrivanje in informacije

Poslovni partnerji dokumentirajo svoje poslovne dejavnosti, načine dela, ukrepe na področju zdravja, varnosti in varstva okolja. Te informacije se na zahtevo razkrijejo Volkswagen Group, v kolikor tovrstno razkritje ni v nasprotju z zakonskimi določbami.

6. Sustainability requirements for responsible supply chains

Transparency

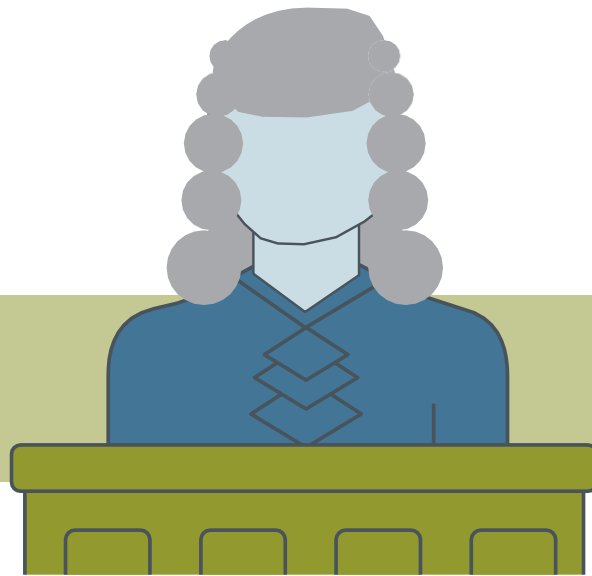
To identify and mitigate sustainability risks in the supply chain, business partners, on request, disclose information on their supply chains to the Volkswagen Group that are required by the Volkswagen Group to fulfil its legal obligations. The business partners are also obliged to impose a corresponding 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. Zahteve glede trajnosti in odgovorne dobavne verige

Transparentnost

Da bi prepoznali in zmanjšali tveganja za trajnost v dobavni verigi, poslovni partnerji Volkswagen Group na zahtevo razkrijejo informacije o svojih dobavnih verigah, ki jih Volkswagen Group potrebuje za izpolnjevanje svojih zakonskih obveznosti. Poslovni partnerji morajo prav tako zagotoviti, da ustrezna zahteva glede razkritja velja za njihove dobavitelje, ti pa jo prenesejo naprej na svoje dobavitelje.

V skladu s tem se lahko od poslovnih partnerjev zahteva, da Volkswagen Group razkrijejo svojo dobavno verigo vse do izvora materiala (vključno s stičišči, kot so talilnice in rafinerije) in predložijo dokazila o sistemih upravljanja ali preverjanjih s strani tretjih oseb, ki preprečujejo ali zmanjšujejo tveganja za trajnost v dobavni verigi.

Dobavne verige surovin

Zaradi znatnega vpliva na ljudi in naš planet imajo vsi posamezniki vzdolž dobavne verige surovin posebno dolžnost, da spoštujejo človekove pravice in varstvo okolja.

Tako morajo poslovni partnerji na področju surovin izpolnjevati zlasti svoje obveznosti glede potrebne skrbnosti iz »Smernic OECD o potrebni skrbnosti za odgovorne verige oskrbovanja z minerali z območij, prizadetih zaradi konfliktov, in območij z visokim tveganjem«.

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. Preverjanje skladnosti z zahtevami glede trajnosti s strani Volkswagen Group

Splošno

Volkswagen Group si pridržuje pravico, da pred oddajo novega naročila ter redno, naključno ali priložnostno med celotnim poslovnim odnosom z ustreznimi sredstvi preveri skladnost z zahtevami glede trajnosti.

Takšno preverjanje lahko opravi na primer z oceno tveganja na zadevnem poslovnem področju poslovnega partnerja, s samooceno poslovnega partnerja oziroma z najemom strokovnjakov za pregled na kraju samem. Takšen pregled na kraju samem se izvaja le ob prisotnosti predstavnikov poslovnega partnerja v rednem delovnem času in v skladu z veljavno zakonodajo, zlasti v zvezi z varstvom podatkov. Poslovni partnerji morajo sprejeti ustrezne in razumne ukrepe, ki Volkswagen Group dajejo pravico, da opravi ustrezne revizije tudi pri njihovih poslovnih partnerjih, če je to potrebno za izpolnjevanje zakonskih obveznosti.

Predpogodbno preverjanje

Če so v okviru predpogodbenih preverjanj ugotovljena tveganja za trajnost, je izvajanje morebitnih ukrepov, ki iz tega izhajajo, pogoj za sklenitev pogodbe. V tem primeru mora poslovni partner po sklenitvi pogodbe v razumnem roku preučiti vsako ugotovljeno ali grozečo kršitev zahteve glede trajnosti na svojem poslovnem področju ali v svoji dobavni verigi in jo odpraviti brez dodatnih stroškov za Volkswagen Group.

Ugotovitve predpogodbenih preverjanj skladnosti z zahtevami glede trajnosti so merilo, pomembno za sklenitev pogodb.

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.

Kršitev zahtev glede trajnosti pri poslovnem partnerju

V primeru nastale ali neposredno grozeče kršitve zahtev glede trajnosti pri poslovnem partnerju je Volkswagen Group upravičen, da nemudoma sprejme ustrezne ukrepe za preprečevanje in odpravo kršitve oziroma zmanjšanje njenega obsega.

V tem primeru je poslovni partner dolžan sprejeti ustrezne ukrepe za preprečevanje, odpravo in zmanjšanje obsega te kršitve.

Poslovni partner se udeleži ene ali več oblik usposabljanj Volkswagen Group, pod pogojem, da bi udeležba na usposabljanju lahko vodila v odpravo ali zmanjšanje kršitve.

Če je kršitev takšna, da je ni mogoče odpraviti v bližnji prihodnosti, mora poslovni partner nemudoma sprejeti in začeti izvajati koncept za odpravo ali zmanjševanje kršitve (vključno s konkretnim časovnim planom). Če je to zakonsko zahtevano, mora Volkswagen Group pri pripravi tega koncepta ustrezno sodelovati.

Kršitev zahtev glede trajnosti v dobavni verigi poslovnega partnerja

Če obstajajo dejanski znaki kršitev obveznosti (utemeljene informacije), povezane s človekovimi pravicami ali varstvom okolja na začetku dobavne verige (pri posrednih dobaviteljih Volkswagen Group), potem mora poslovni partner nemudoma

1. sodelovati pri analizi tveganj Volkswagen Group,
2. opredeliti ustrezne preventivne ukrepe za zadevnega poslovnega partnerja in
3. ustrezno podpreti Volkswagen Group pri pripravi in izvajanju koncepta za preprečevanje, odpravo ali zmanjšanje obsega kršitve.

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.



Druge posledice

Če poslovni partner krši zahteve glede trajnosti oziroma jih ne spoštuje, si Volkswagen Group pridržuje pravico, da sprejme ustrezne ukrepe za zaščito svojih pravic, kot so:

- zahteva za izvajanje ukrepov za izboljšanje,
- preverjanje predlaganih izboljšav ali ukrepov,
- izključitev iz novih pogodb in
- odpoved pogodbe ali izredna odpoved pogodbe.

Volkswagen Group se lahko odreče uveljavljanju pravice do odpovedi, če lahko poslovni partner verodostojno potrdi in dokaže, da je nemudoma začel izvajati protiukrepe za preprečevanje podobnih kršitev v prihodnosti.

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. Prijava kršitev

Prijava kršitev

Kršitve je treba nemudoma prepoznati, obravnavati in odpraviti, da bi zavarovali zaposlene, poslovne partnerje, tretje osebe in Volkswagen Group. To zahteva skrbnost vseh udeležencev, skupaj s pripravljenostjo, da se opozori na morebitne resne kršitve predpisov na podlagi konkretnih dokazov.

Pritožbeni postopek poslovnih partnerjev

Poslovni partnerji vzpostavijo pritožbeni postopek, ki je primeren za njihovo podjetje. Sistem omogoča, da lahko zaposleni in drugi potencialno ogroženi posamezniki anonimno, zaupno in brez strahu pred povračilnimi ukrepi izrazijo svoje pomisleke glede poslovne etike, spoštovanja človekovih pravic ali varstva okolja. Poslovni partnerji ne smejo sprejeti nikakršnih ukrepov, ki bi ovirali, preprečevali ali onemogočali dostop do pritožbenega postopka. Poslovni partner se zavezuje, da bo obveznosti iz prejšnjega stavka pogodbeno prenesel naprej na svoje dobavitelje in da bo v okviru svojih zmožnosti zagotovil, da se obveznosti prenesejo vzdolž dobavne verige.

NAPOTEK

Kanal za pritožbe mora temeljiti na merilih učinkovitosti 31. vodilnega načela UN o podjetništvu in človekovih pravicah ter zajemati lastno poslovanje podjetja in njegovo dobavno verigo.

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).

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 obravnave prijaviteljev Volkswagen Group

Volkswagen Group zaupnim in koristnim informacijam poslovnih partnerjev, strank in drugih tretjih oseb pripisuje velik pomen.

V primeru konkretnih indicov o morebitnih kršitvah s strani zaposlenih v Volkswagen Group, poslovnega partnerja ali poslovnih partnerjev poslovnega partnerja pri sodelovanju s Volkswagen Group, Volkswagen Group vsem vpletenim nudi možnost, da kršitev prijavijo v sistemu obravnave prijaviteljev Volkswagen Group.

Vse informacije in kontakti so na voljo v sistemu obravnave prijaviteljev (volkswagenag.com).

Poslovni partnerji se zavezujejo, da bodo svojim zaposlenim zagotovili neoviran dostop do sistema obravnave prijaviteljev, vzpostavljenega v Volkswagen Group, in da se bodo vzdržali vseh dejanj, ki bi lahko ovirala, preprečevala ali oteževala dostop do tega sistema. Poslovni partnerji se zavezujejo, da bodo obveznosti iz prejšnjega stavka pogodbeno prenesli naprej na svoje dobavitelje in da bodo v okviru svojih zmožnosti zagotovili, da se obveznosti prenesejo vzdolž dobavne verige.

NAPOTEK

Sistem obravnave prijaviteljev Volkswagen Group je odgovoren za prijavljanje težjih kršitev predpisov in kršitev zakona. Sistem obravnave prijaviteljev s poštenim in transparentnim postopkom ščiti naše podjetje, vpletene osebe in prijavitelje. Sistem temelji na standardiziranih in hitrih procesih ter na zaupni in strokovni obdelavi prijav s strani notranjih strokovnjakov.

Sistem obravnave prijaviteljev Volkswagen Group ponuja možnost uporabe spletne komunikacijske platforme za navezovanje stikov z odvetniki, ki delajo v preiskovalnem uradu, izmenjavo dokumentov in ohranjanje stikov prek ločenega nabiralnika. Ta platforma je zaupna in zaščitena. Prijavitelji se lahko sami odločijo, ali želijo pri prijavi navesti svoje ime ali ostati anonimni.

Kot dodatna kontaktna točka so na voljo tudi zunanji varuhi pravic. To so odvetniki, ki so zapriseženi varovati poslovne skrivnosti, tudi do koncerna. Zato so lahko prijavitelji, ki ne želijo navesti svojega imena, lahko prepričani, da njihova identiteta Volkswagen Group ne bo razkrita. Varuhi pravic s privolitvijo prijaviteljev posredujejo prijave – anonimno, če prijavitelj tako želi – sistemu obravnave prijaviteljev Volkswagen Group.

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.

Če so bile s poslovnim partnerjem s posameznimi pogodbami dogovorjene obveznosti, ki odstopajo od načel tega dokumenta, prevladajo te odstopajoče obveznosti.


V primeru dvomov ali nejasnosti velja angleška različica.

Wolfsburg, January 01st, 2023


Wolfsburg, 1. 1. 2023



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