



Slavery and Human Trafficking Statement Automobili Lamborghini S.p.A.

This statement has been issued in accordance with Section 54 of the United Kingdom Modern Slavery Act 2015. It describes all implemented measures of Automobili Lamborghini S.p.A. on preventing forms of modern slavery and human trafficking.

Preamble

In view of advancing globalisation and the increased relocation of manufacturing to the relevant sales markets, we are aware of our global responsibility when it comes to defending human rights. For us, this responsibility does not end at our factory doors; it extends well 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 166 Dealers in 51 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 has been updated during 2020 Year according to the Group Whistleblowing channels. 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 either outside the Company and are available to all employees on the intranet and to the third parties on the Internet at any time.

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).

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.

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.



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 web site.

The main procedural principles and safeguards are the protection of both the whistleblower and the concerned person. Discrimination against whistleblowers is a serious regulatory violation and will not be tolerated.

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. Also new hired employees who join Lamborghini are invited to participate to the compliance training of which the human rights protection topic is part of. Moreover, starting from mid of 2020, a dedicated web base training will be conducted to all the employees concerning Ethic Code, of which human rights protection topic is part of, and Whistleblower System.

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 standard GRC process. Risk assessments pertaining to human rights are conducted by internal key divisions, including the updates of the countermeasures taken. The annual regular GRC 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 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](#)), 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.

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

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.



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, according to the existing 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.

Automobili Lamborghini S.p.A.
June 2020

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

Stefano Domenicali

Chairman and CEO of Automobili Lamborghini S.p.A.

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

Paolo Poma

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