



Lead the Charge Automaker Supply Chain Scorecard - 2026 Edition

The aim of this scorecard is to establish a new expectation – and competitive advantage – for what a clean car really is. Not just an EV, but an EV that is manufactured:

- **Equitably** – respecting and advancing the rights of Indigenous Peoples, workers, and local communities throughout the supply chain.
- **Sustainably** – preserving and restoring environmental health and biodiversity across supply chains, whilst reducing primary resource demand through efficient resource use and increased recycled content.
- **Fossil free** – 100% electric and made with a fossil fuel-free supply chain.

The research and indicator development for the scorecard was led by Pensions & Investment Research Consultants (PIRC), Europe's largest independent corporate governance and shareholder advisory firm, whose work was guided by members of the Lead the Charge coalition. Please refer to the accompanying methodology document for more information on the indicator development and research process.

This document contains the scores obtained by each automaker for each indicator of the scorecard, as well as explanations for why they were awarded these scores and information on the thresholds and benchmarks used for each indicator. Note that the final version of this scorecard will be published as an interactive web page online.

Navigating this document

This document has several worksheets which present the data from the scorecard with differing levels of detail:

[2. Summary | Overall - - this worksheet presents the total scores the automakers received for each of the two main categories \(climate & environment, and human rights\), as well as the total scores for each of their four sub-categories.](#)

[3. Summary | Climate & Environment - this worksheets presents the scores for each indicator of the climate and environment category, which looks at automakers' efforts to ensure fossil-free and environmentally responsible supply chains.](#)

[4. Summary | Respect for Human Rights - this worksheet presents the scores for each indicator of the human rights categories, which looks at efforts by automakers to ensure responsible sourcing and respect for human rights throughout their supply chain](#)

[5. Auto Review | Climate & Environment - this worksheet also presents automakers' scores for each indicator in the climate & environment category but additionally includes the explanation and references for each score they received, as well as information on the respective benchmarks and thresholds applied to each indicator.](#)

[6. Auto Review | Respect for Human Rights - this worksheet also presents automakers' scores for each indicator in the human rights category but additionally includes the explanation and references for each score they received, as well as information on the respective benchmarks and thresholds applied to each indicator.](#)

[8. Weightings - this worksheet provides an overview of the weighting methodology applied to the groups of indicators used for each sub-category. Please see the accompanying methodology document for more information on this weighting methodology](#)

[9. 3rd Party Schemes Assessment - this worksheet shows the results of the assessment of third party auditing and accreditation schemes, which results in point modifiers being applied to some indicators. Please see the accompanying methodology document for more information on this assessment.](#)

Overall scores

Auto	Total score	Fossil Free and Environmentally Sustainable Supply Chains						Human rights and Responsible Sourcing					BEV % of total vehicle sales [^]
		General	Steel	Aluminium	Batteries	Total	Total x IM [~]	General	Transition mineral sourcing	Indigenous Peoples' rights	Workers' rights in the supply chain	Total	
BMW	34%	67%	16%	9%	16%	27%	30%	73%	32%	12%	39%	39%	19%
BYD	14%	18%	0%	8%	20%	12%	13%	38%	12%	0%	13%	16%	53%
Ford	45%	58%	23%	37%	29%	37%	40%	73%	70%	26%	28%	49%	6%
GAC	4%	11%	0%	0%	9%	5%	5%	4%	2%	0%	3%	2%	48%
Geely*	27%	38%	19%	21%	26%	26%	31%	51%	17%	2%	26%	24%	36%
GM	22%	29%	18%	19%	7%	18%	20%	46%	23%	11%	19%	25%	19%
Honda	12%	32%	0%	1%	2%	9%	8%	37%	20%	0%	8%	16%	2%
Hyundai	23%	41%	12%	8%	15%	19%	21%	47%	26%	3%	22%	25%	9%
Kia	21%	51%	7%	4%	10%	18%	20%	44%	25%	6%	19%	23%	12%
Mercedes	41%	51%	28%	26%	36%	35%	39%	62%	35%	26%	48%	42%	11%
Nissan	15%	35%	1%	15%	7%	15%	13%	40%	14%	0%	12%	17%	4%
Renault	31%	49%	5%	10%	39%	26%	28%	52%	34%	17%	36%	35%	12%
SAIC	3%	10%	0%	0%	6%	4%	4%	0%	0%	0%	3%	1%	22%
Stellantis	21%	37%	1%	1%	22%	15%	14%	64%	26%	3%	21%	29%	7%
Tesla	49%	45%	22%	45%	56%	42%	50%	60%	69%	25%	40%	48%	100%
Toyota	9%	20%	0%	0%	12%	8%	7%	18%	19%	0%	3%	10%	2%
Volkswagen	39%	54%	13%	16%	31%	28%	31%	68%	48%	23%	46%	46%	11%
Volvo	44%	53%	58%	55%	17%	46%	55%	64%	37%	8%	20%	32%	23%

[^] Automotive sales data from Marklines. All figures are cumulative annual values for the year 2025. The data covers passenger vehicles only.
^{*} Geely Auto Group data includes Marklines sales data from the Geely, Galaxy, Zeekr and Lynk&Co brands only.

[~] InfluenceMap scores were applied as a multiplier on the C&E section. Autos with a C or above received positive multiplier; below received negative, and autos not evaluated by InfluenceMap received no change. See the Climate & Environment review sheet for details. <https://automotive.influencemap.org/>

Summary of fossil-free and environmentally sustainable supply chains scores

Theme	Indicator Category	Indicators	Total Number of Points	BMW Group Points
1. Fossil Free and Environmentally Sustainable Supply Chains (General)	1.1. Disclosure of emissions, water and deforestation management	1.1.1. The company discloses total scope 3 GHG emissions due to purchased goods and services.	2	2
		1.1.2. The company discloses "significant emissions" in its supply chain.	1	0
		1.1.3. The company discloses water usage by key suppliers in its supply chain.	1	0
		1.1.4. The company discloses deforestation and conversion-free commodity volumes from its supply chain	1	0
		DISCLOSE TOTAL	5	2
		DISCLOSE %		40%
	1.2. Target-setting and progress towards fossil free and environmentally sustainable supply chains	1.2.1. The company has set and disclosed a scope 3 SBT (must include reference to upstream/ purchased goods & not only 'Well to Wheel')	2	2
		1.2.2. The company commits to having suppliers provide science-based targets for GHG emissions.	1	0.25
		1.2.3. The company discloses the current percentage of suppliers providing science-based targets.	1	0
		1.2.4. The company requires all significant suppliers to set water reduction targets and disclose their water usage.	1	0.5
		1.2.5. The company has programs in place to monitor suppliers for compliance with GHG emissions targets and other environmental impacts.	1	0.50
		1.2.6. The company commits to eliminate deforestation and the conversion of all natural ecosystems from their supply chains.	1	0.5
		TARGET-SETTING & PROGRESS TOTAL	7	3.75
	TARGET-SETTING & PROGRESS %		54%	
	1.3. Use of supply chain levers to achieve fossil free and environmentally sustainable supply chains	1.3.1. The company incentivises suppliers to reduce GHG and other significant air emissions.	1	0.75
		1.3.2. The company implements incentives and control systems to improve water management by suppliers	1	1
		1.3.3. The company implements incentives and control systems to eliminate deforestation from its supply chain	1	1
		SUPPLY CHAIN LEVERS TOTAL	3	2.75
		SUPPLY CHAIN LEVERS %		92%
	GENERAL CLIMATE AND ENVIRONMENT - TOTAL % SCORE (WEIGHTED)			
2. Fossil Free and Environmentally Sustainable Steel	2.1. Disclosure of scope 3 GHG emissions due to steel supply chains	2.1.1. The company discloses disaggregated GHG emissions for their steel supply chains.	1	0
		DISCLOSE TOTAL	1	0
		DISCLOSE %		0%
	2.2. Target setting and progress towards fossil free and environmentally sustainable steel supply chains	2.2.1. The company has set targets for the use of fossil free and environmentally sustainable steel.	2	0
		2.2.2. The company publishes progress towards their target by disclosing the current percentage of fossil-free and/or lower emission steel in their annual production cycle.	1	0
		2.2.3. The company has a target for the use of recycled steel by 2030.	2	0
		2.2.4. The company publishes progress towards their target by disclosing the current percentage of recycled steel used in its annual production cycle.	1	0
		TARGET-SETTING & PROGRESS TOTAL	6	0
		TARGET-SETTING & PROGRESS %		0%
	2.3. Use of supply chain levers to achieve fossil free and environmentally sustainable steel supply chains	2.3.1. The company participates in multi-stakeholder procurement initiatives to collaborate with other buyers to incentivise investment in and production of fossil free steel at scale.	1	0
		2.3.2. The company participates in multi-stakeholder standard / certification initiatives to drive investment in and production of socially and environmentally sustainable steel at scale.	1	0
		2.3.3. The company has entered into formal arrangements with suppliers to incentivise investment in and greater production of fossil free steel.	2	1.5
		2.3.4. The company integrates improved recyclability of steel into automobile design and manufacturing.	2	0.7
		SUPPLY CHAIN LEVERS TOTAL	6	2.2

Summary of fossil-free and environmentally sustainable supply chains scores					
Theme	Indicator Category	Indicators	Total Number of Points	BMW Group Points	
		SUPPLY CHAIN LEVERS %		37%	
		STEEL - TOTAL % SCORE (WEIGHTED)		16%	
	3.1. Disclosure of scope 3 GHG emissions due to aluminium	3.1.1. The company discloses disaggregated GHG emissions for their aluminium supply chains.	1	0	
		DISCLOSE TOTAL	1	0	
		DISCLOSE %		0%	
	3.1. Disclosure of scope 3 GHG emissions due to aluminium	3.2.1 The company has set targets for the use of fossil free and environmentally sustainable aluminium	2	0	
		3.2.2. The company publishes progress towards their target by disclosing the current percentage of fossil-free and/or lower emission aluminium in their annual production cycle	1	0	
		3.2.3. The company has a target to increase use of recycled aluminium by 2030.	2	0	
		3.2.4. The company publishes progress towards their target by disclosing the current percentage of recycled aluminium used in its annual production cycle	1	0.5	
		TARGET-SETTING & PROGRESS TOTAL	6	0.5	
		TARGET-SETTING & PROGRESS %		8%	
	3.3. Use of supply chain levers to achieve fossil free and environmentally sustainable aluminium supply chains	3.3.1. The company participates in multi-stakeholder procurement initiatives to collaborate with other buyers to incentivise investment in and production of fossil free aluminium at scale.	1	0	
		3.3.2. The company participates in multi-stakeholder standard / certification initiatives to drive investment in and production of socially and environmentally sustainable aluminium	1	0.1	
		3.3.3. The company has entered into formal arrangements with suppliers to incentivise investment in and greater production of fossil free aluminium	2	0	
		3.3.4. The company integrates improved recyclability of aluminium into automobile design and manufacturing.	2	0.7	
		SUPPLY CHAIN LEVERS TOTAL	6	0.8	
		SUPPLY CHAIN LEVERS %		13%	
			ALUMINIUM - TOTAL % SCORE (WEIGHTED)		9%
	4. Fossil Free and Environmentally Sustainable Batteries	4.1. Disclosure of scope 3 GHG emissions due to battery supply chains	4.1.1. The company discloses disaggregated scope 3 emissions for their battery supply chains, including a total for the whole battery and disaggregated emissions for key battery minerals (cathode / anode active materials)	1	0
DISCLOSE TOTAL			1	0	
DISCLOSE %				0%	
4.2. Target setting and progress towards fossil free and environmentally sustainable battery supply chains		4.2.1. The company has set a target to produce fossil free and environmentally sustainable batteries.	1	0	
		4.2.2. The company has set a target to reduce reliance on energy intensive minerals in battery production.	1	0	
		4.2.3. The company has set collection and/or recovery targets for high intensity battery metals.	1	0	
		TARGET-SETTING & PROGRESS TOTAL	3	0	
		TARGET-SETTING & PROGRESS %		0%	
4.3. Use of supply chain levers to achieve fossil free and environmentally		4.3.1. The company requires all battery manufacturers to use 100% renewable electricity	2	1	
		4.3.2. Company engages and/or enters into formal agreements with extractives and other value chain companies to prevent/mitigate adverse environmental impacts of lithium sourcing.	1	0.75	
		4.3.3. Company engages and/or enters into formal agreements with extractives and other value chain companies to prevent/mitigate adverse environmental impacts of nickel sourcing.	1	0.25	

Summary of fossil-free and environmentally sustainable supply chains scores

Theme	Indicator Category	Indicators	Total Number of Points	BMW Group Points
	sustainable battery supply chains	4.3.4. Company engages and/or enters into formal agreements with extractives and other value chain companies to prevent/mitigate adverse environmental impacts of cobalt sourcing.	1	0.25
		4.3.5. The company participates in multi-stakeholder initiatives to collaborate with other buyers to incentivise investment in and production of fossil free and environmentally sustainable batteries at scale.	1	1
		4.3.6. The company invests in the development of new battery chemistries & technologies that minimize their overall material and carbon footprint by reducing the use of emissions-intensive minerals and toxic materials	2	0.5
		4.3.7. The company invests in the development of new battery designs, technologies, systems and/or processes to maximize the safe and effective recycling of EV batteries	1	0
		4.3.8. The company has established processes for battery repair, reuse and repurposing in order to maximize the usable lifespan of its EV batteries.	1	0
		4.3.9. The company has established closed-loop processes in order to maximize the recycling of end-of-life EV batteries	1	0.25
		SUPPLY CHAIN LEVERS TOTAL	11	4
		SUPPLY CHAIN LEVERS %		36%
		BATTERIES - TOTAL % SCORE (WEIGHTED)		
Climate Influence	Influence Map	Multiplier applied:		1.1

CLIMATE AND ENVIRONMENT - TOTAL NORMALIZED	18.0	4.9
CLIMATE AND ENVIRONMENT - TOTAL % SCORE (WEIGHTED)		27%
CLIMATE AND ENVIRONMENT - TOTAL NORMALIZED + IM MULTIPLIER		5.4
CLIMATE AND ENVIRONMENT - TOTAL % SCORE (WEIGHTED) + IM MULTIPLIER		30%

Summary of human rights & responsible sourcing scores				
Sub-section	Indicator Category	Indicators	Total Number of Points	BMW Group Points
1. Responsible Sourcing: General HR indicators	1.1. Commit	1.1.1. The company has a public commitment to human rights.	1	1
		1.1.2. The company extends their human rights commitments to their Tier 1 suppliers and beyond.	2	2
		COMMIT TOTAL	3	3
		COMMIT %		100%
	1.2. Identify	1.2.1. The company has a process in place to assess salient human rights risks in their supply chain.	1	1
		1.2.2. The company discloses the salient human rights risks in their supply chain and where they are located.	1	0.5
		1.2.3. The company has a process for identifying high risk supplier categories in their supply chain.	1	1
		IDENTIFY TOTAL	3	2.5
		IDENTIFY %		83%
	1.3. Prevent, Mitigate and Account	1.3.1. The company assesses the risk of adverse human rights impacts with suppliers prior to entering into any contracts.	2	1
		1.3.2. The company discloses how it monitors suppliers for compliance with the SCoC during the contract period.	2	0.8
		1.3.3. The company reports on how it is prepared to respond if it finds non-conformances with the SCoC	1.5	1
		1.3.5. The company discloses how they verify the implementation of corrective actions.	1	1
		PREVENT, MITIGATE & ACCOUNT TOTAL	6.5	3.8
		PREVENT, MITIGATE & ACCOUNT %		58%
	1.4. Remedy	1.4.1. The company has put in place a formal mechanism whereby workers, suppliers, suppliers' workers (in any tier) and other external stakeholders can raise grievances regarding adverse human rights impacts in their supply chain to an impartial entity.	2	1
		1.4.3. The company discloses data about the practical operation of their grievance mechanism, such as the number of grievances filed, addressed, and resolved, their type, severity and outcome.	1	0.75
		1.4.4. The company has put in place a remedy process for its supply chain.	2	1.5
		REMEDY TOTAL	5	3.25
		REMEDY %		65%
GENERAL HUMAN RIGHTS - TOTAL % SCORE (WEIGHTED)				73%
2. Responsible Sourcing of Transition Minerals	2.1. Commit	2.1.1. The company has a commitment to responsible metals and minerals sourcing.	1	1
		2.1.2. The company requires its suppliers to undertake due diligence in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas (CAHRAs)	2	1.2
		COMMIT TOTAL	3	2.2
		COMMIT %		73%
	2.2. Identify	2.2.1. The company has a process in place to map transition minerals (e.g. nickel, lithium, cobalt, copper, manganese, zinc) in their supply chains to the point of extraction.	2	1.5
		2.2.2. The company discloses conflict minerals risks in their supply chain and where they are located.	1	0.25
		2.2.3. The company discloses broader transition minerals risks in their supply chain and where they are located.	1	0.25
		2.2.4. The company publishes a list of smelters or refiners (SoR) in its supply chain	1	0
		2.2.5. The company discloses which of the SoRs in its supply chain are conformant with the Responsible Minerals Initiative (RMI).	1	0
		IDENTIFY TOTAL	6	2

Summary of human rights & responsible sourcing scores					
Sub-section	Indicator Category	Indicators	Total Number of Points	BMW Group Points	
		IDENTIFY %		33%	
	2.3. Prevent, Mitigate and Account	2.3.1. The company discloses how it monitors suppliers for compliance with the transition minerals due diligence requirements.	2	0.8	
		2.3.2. The company formally engages SoRs to build their capacity to conduct due diligence of their own supply chains.	2	0.5	
		2.3.3. The company formally engages extractives companies and includes human rights clauses in any contractual arrangements.	2	0	
		2.3.4. The company is a member of IRMA and actively engages their suppliers with regards to IRMA mining audits.	2	1.2	
		Note: IRMA does not excuse companies from doing their own supply chain due diligence			
		2.3.5. The company reports on how it is prepared to respond if it finds non-conformances associated with its responsible minerals sourcing policy occurring in its operations or supply chains.	1.5	1	
		2.3.6. The company discloses how they verify the implementation of corrective actions.	1	1	
			PREVENT, MITIGATE & ACCOUNT TOTAL	10.5	4.5
		PREVENT, MITIGATE & ACCOUNT %		43%	
	2.4. Remedy	2.4.1. The company has put in place a formal mechanism whereby grievances can be raised about SoR facilities.	1	0	
		REMEDY TOTAL	1	0	
		REMEDY %		0%	
		TRANSITION MINERALS - TOTAL % SCORE (WEIGHTED)		32%	
3. Indigenous Peoples' Rights and Free Prior and Informed Consent (FPIC)	3.1. Commit	3.1.1. The company explicitly commits to respecting the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).	1	0	
		3.1.2. The company has a public commitment to FPIC.	1	0	
		3.1.3. The company requires its tier 1 suppliers to respect Indigenous Peoples' rights	2	2	
		3.1.5. These commitments are translated into the languages used by the impacted Indigenous Peoples.	1	0	
		COMMIT TOTAL	5	2	
		COMMIT %		40%	
	3.2. Identify	3.2.1. The company has a process in place to assess risks to Indigenous Peoples' rights in their supply chain to the point of extraction.	1	0	
		IDENTIFY TOTAL	1	0	
		IDENTIFY %		0%	
	3.3. Prevent, Mitigate and Account	3.3.1. The company provides additional discussion regarding the practices by which suppliers must obtain FPIC	1	0	
		3.3.2. The company is a member of a multi-stakeholder group (e.g. IRMA) that includes the participation of Indigenous Peoples to ensure respect of Indigenous Peoples' rights at the point of extraction.	2	1.2	
		3.3.3. The company has a formal process in place to engage critical upstream suppliers on FPIC (e.g. extractives companies)	2	0	
		3.3.4. The company reports on how it is prepared to respond if it finds FPIC breaches in its supply chain.	1	0	
		PREVENT, MITIGATE & ACCOUNT TOTAL	6	1.2	
		PREVENT, MITIGATE & ACCOUNT %		20%	
	3.4. Remedy	3.4.1. The company's grievance mechanism has a process for investigating and remedying breaches of FPIC that includes a formal role for impacted Indigenous Peoples.	1	0	
		REMEDY TOTAL	1	0	
		REMEDY %		0%	
			INDIGENOUS RIGHTS - TOTAL % SCORE (WEIGHTED)		12%
4. Respect for	4.1. Commit	4.1.1. The company has a commitment to workers' rights	1	0.5	

Summary of human rights & responsible sourcing scores

Sub-section	Indicator Category	Indicators	Total Number of Points	BMW Group Points
Workers' Rights		4.1.2. The company extends their workers' rights commitments to their Tier 1 suppliers and beyond. Note: only the specific worker rights commitments are evaluated here. Whether or not these commitments are extended beyond tier 1 suppliers is evaluated in the "General" human rights section.	2	1.5
		COMMIT TOTAL	3	2
		COMMIT %		67%
	4.2. Identify	4.2.1. The company consults trade unions and/or workers' representatives in their assessment of salient workers' rights risks in their supply chain.	1	0
		4.2.2. The company discloses the salient workers rights risks in their supply chain and where they are located.	1	1
		IDENTIFY TOTAL	2	1
		IDENTIFY %		50%
	4.3. Prevent, Mitigate and Account	4.3.1. The company actively collaborates with workers and the representative organisation(s) of workers' own choosing to promote respect for workers' rights in its supply chain.	2	2
		4.3.2. The company reports on how it is prepared to respond if it finds non-conformances associated with its workers' rights policy occurring in its operations or supply chains.	1.5	1
		4.3.3. The company works with the relevant trade union and/or worker representative organisation to verify the implementation of corrective actions pertaining to workers' rights.	2	0
		PREVENT, MITIGATE & ACCOUNT TOTAL	5.5	3
		PREVENT, MITIGATE & ACCOUNT %		55%
	4.4. Remedy	4.4.1 Workers and the representative organisations of workers' own choosing are formally included in the remedy process.	1	0
		REMEDY TOTAL	1	0
		REMEDY %		0%
WORKERS' RIGHTS - TOTAL % SCORE (WEIGHTED)				39%
HUMAN RIGHTS - TOTAL NORMALIZED			26.0	10.1
HUMAN RIGHTS - TOTAL % SCORE (WEIGHTED)				39%

Company analysis - fossil-free and environmentally sustainable supply chains

Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
1. Fossil Free and Environmentally Sustainable Supply Chains (General)	1.1. Disclosure of emissions, water and deforestation management	1.1.1. The company discloses total scope 3 GHG emissions due to purchased goods and services.	2	<p>The following scores are absolute, not cumulative:</p> <p>100%: The company discloses scope 3 GHG emissions due to purchased goods and services.</p> <p>25%: The company includes scope 3 GHG emissions including purchased goods and services in overall disclosure, but does not disaggregate.</p> <p>Note: the company may achieve additional points under each of the supply chain areas below, if they provide disaggregated emissions against each supply chain.</p>	<p>BMW disaggregates scope 3 GHG emissions due to "purchased goods and services" from other scope 3 emissions in its 2024 Annual Report (p. 196).</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p>	2
		1.1.2. The company discloses "significant emissions" in its supply chain.	1	<p>Based on GRI 305-7, significant emissions include:</p> <ul style="list-style-type: none"> i. NOx ii. SOx iii. Persistent organic pollutants (POP) iv. Volatile organic compounds (VOC) v. Hazardous air pollutants (HAP) vi. Particulate matter (PM) vii. Other standard categories of air emissions identified in relevant regulations <p>The following scores are absolute not cumulative:</p> <p>100%: the company discloses significant emissions against all of the above categories by key suppliers in its supply chain. The company will need to define its key suppliers if it does not disclose this information for the whole supply chain.</p> <p>50%: the company discloses significant emissions against some of the above categories for part of its supply chain.</p>	<p>BMW indicates in its Terms and Conditions for the Purchase of Production Materials and Automotive Components (2022 version, p. 18) that the supplier, upon BMW's request, shall provide the information relating to the total annual scope of orders placed by and supplied to BMW and its affiliated companies regarding VOC emissions in metric tons. However, this data is not disclosed publicly.</p> <p>Terms and Conditions for the Purchase of Production Materials and Automotive Components https://b2b.bmw.com/web/b2b/einkauf-direktes-material</p>	0
		1.1.3. The company discloses water usage by key suppliers in its supply chain.	1	<p>According to GRI 303, water usage includes:</p> <ul style="list-style-type: none"> - water withdrawn - water consumed - water discharged <p>The following scores are absolute not cumulative:</p> <p>100%: the company provides data against all of the above indicators for key suppliers in its supply chain. The company will need to define key suppliers if they do not disclose this information for their whole supply chain.</p> <p>50%: the company provides data against some of the above indicators for part of its supply chain.</p>	<p>BMW indicates in its Terms and Conditions for the Purchase of Production Materials and Automotive Components (2022 version, p. 18) that the supplier, upon BMW's request, shall provide the information relating to the total annual scope of orders placed by and supplied to BMW and its affiliated companies regarding total water consumption and process wastewater in m3. However, this data is not disclosed publicly.</p> <p>Terms and Conditions for the Purchase of Production Materials and Automotive Components https://b2b.bmw.com/web/b2b/einkauf-direktes-material</p>	0

Company analysis - fossil-free and environmentally sustainable supply chains

Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		1.1.4. The company discloses deforestation and conversion-free commodity volumes from its supply chain	1	<p>50%: The company discloses the percentage of high-risk hard commodity volumes sourced that are compliant with the company's requirements or policies on deforestation and conversion. OR 25%: The company discloses deforestation and conversion-free commodity volumes from at least one of its key high-risk hard commodities</p> <p>50%: The company discloses the percentage of high-risk soft commodity volumes sourced that are compliant with the company's requirements or policies on deforestation and conversion. OR 25%: The company discloses deforestation and conversion-free commodity volumes from at least one of its key high-risk soft commodities</p> <p>MODIFIER: Half points will be awarded if a company discloses information that meets any of the above criteria but only for part of its supply chain</p> <p>High-risk commodities are identified with the SBTN's High Impact Commodities List. Relevant commodities for automotive supply chains include Copper, Iron, Lithium, Nickel, Bauxite/Aluminum, Zinc and Manganese (hard commodities), and Leather and Rubber (soft commodities).</p>	<p>BMW published an updated policy on biodiversity and anti-deforestation in December 2024, showing its commitment towards deforestation and conversion-free supply chains, especially for natural rubber and leather. However, the company does not provide quantitative data on the volumes of deforestation and conversion-free commodities for any of the listed materials.</p> <p>Biodiversity policy (December 2024) https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2024/BMW_Group_BiodiversityPolicy_EN_2024.pdf</p> <p>Anti-deforestation policy (December 2024) https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2024/202412_BMW_AntiDeforestationPolicy_EN.pdf</p> <p>High-Level Commitment of the BMW Group for Sustainable Natural Rubber https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2022/2022_Commitment_BMW_Naturalrubber.pdf</p>	0

Company analysis - fossil-free and environmentally sustainable supply chains

Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
	<p>1.2. Target-setting and progress towards fossil free and environmentally sustainable supply chains</p>	<p>1.2.1. The company has set and disclosed a scope 3 SBT (must include reference to upstream/purchased goods & not only 'Well to Wheel')</p>	<p>2</p>	<p>The following scores are absolute, not cumulative:</p> <p>100%: the company has disclosed verified science-based targets that include scope 3, including 2050 (or sooner) and interim year target(s), and has also disclosed a disaggregated interim target for upstream/purchased goods (scope 3 category 1)</p> <p>50%: the company discloses a lifecycle target that includes upstream/purchased goods, including 2050 (or sooner) and interim year target(s), and/or does not indicate if its target(s) has been verified as science-based.</p> <p>25%: the company only discloses a 2050 zero emissions target with no interim target and/or does not specify upstream/purchased goods.</p>	<p>BMW has a commitment to achieve net zero CO2e emissions across its entire value chain by no later than 2050, with interim targets set for 2030 (2024 Group Report, p. 119).</p> <p>Starting from the financial year 2024, BMW's carbon equivalent reduction targets (Scopes 1, 2, and 3) are presented in absolute values (tonnes CO2e), replacing the relative targets per vehicle that were introduced in 2021 (p. 119). BMW states that "this objective is based on decarbonisation targets up to 2030 that were validated in 2021 by the SBTi" (2024 CDP Questionnaire, p. 511). Regarding the 2050 target, BMW also indicates that "we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years" (p. 523).</p> <p>These targets include an "absolute target of 108 million tonnes of CO2e for 2030," which "was defined for Scope 3 emissions in the Automotive segment, based on Purchased goods and services, Logistics and the Use phase. This is equivalent to a 27.5% reduction in emissions compared to the base year 2019 (148.9 million tonnes of CO2e)" (2024 Group Report, p. 127). Although this target is not disaggregated for purchased goods and services specifically, BMW discloses in its 2024 CDP Questionnaire (p. 162 & 222) that it has also set a target to reduce "carbon emissions in the supply chain by at least 20 % (base year 2019) per vehicle by 2030."</p> <p>2024 Group Report</p> <p>2024 CDP Questionnaire</p>	<p>2</p>

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Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		1.2.2. The company commits to having suppliers provide science-based targets for GHG emissions.	1	<p>The following scores are absolute not cumulative.</p> <p>100%: the company requires all its tier 1 suppliers to set science-based targets. They also require tier 2 suppliers to set science-based targets.</p> <p>75%: the company requires all its tier 1 suppliers set science-based targets.</p> <p>50%: the company commits to having at least 70% of its key suppliers by emissions setting science-based targets within 2 years.</p> <p>25%: company commits to having suppliers setting science-based emissions targets, but does not provide a target date or target date is more than 2 years away.</p> <p>0%: Company does not have a commitment.</p>	<p>BMW states that “one of BMW’s most important KPIs is the rate of suppliers which have set themselves science-based targets” (2024 CDP Questionnaire, p. 216). BMW also considers suppliers' activities in CO2e reduction initiatives, including the setting of science-based emission reduction targets when releasing bidder circles for the nomination process (p. 222). However, BMW has not set a target date to achieve science-based target setting for all its suppliers.</p> <p>2024 CDP Questionnaire https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bbericht/BMW-Group-CDP-Climate-and-Water-Security-Questionnaire-2024.pdf</p>	0.25
		1.2.3. The company discloses the current percentage of suppliers providing science-based targets.	1	<p>25%: the company discloses the current percentage of tier 1 suppliers providing science-based targets.</p> <p>25%: the company discloses the current number and/or percentage of tier 2 suppliers providing science-based targets.</p> <p>25%: additional points for over 50% of tier 1 suppliers providing science-based targets</p> <p>25%: additional points for all tier 1 suppliers providing science-based targets.</p>	<p>BMW discloses the number of suppliers participating in the CDP rating and the number of contractual agreements that include specification of decarbonization measures (2024 CDP Questionnaire, p. 222). However, the company does not disclose the percentage of supplies that have provided science-based targets.</p> <p>2024 CDP Questionnaire https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bbericht/BMW-Group-CDP-Climate-and-Water-Security-Questionnaire-2024.pdf</p>	0

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Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		1.2.4. The company requires all significant suppliers to set water reduction targets and disclose their water usage.	1	<p>50%: the company requires tier 1 suppliers to set water reduction targets</p> <p>50%: the company requires tier 1 suppliers to disclose their water usage. According to GRI 303, water usage includes:</p> <ul style="list-style-type: none"> - water withdrawn - water consumed - water discharged 	<p>BMW indicates in its Terms and Conditions for the Purchase of Production Materials and Automotive Components (2022 version, p. 18) that the supplier, upon BMW's request, shall provide the information relating to the total annual scope of orders placed by and supplied to BMW and its affiliated companies regarding total water usage and process wastewater in m3. In its 2024 CDP questionnaire (p. 218), BMW also indicates that it "collect water quantity information at least annually from suppliers (e.g., withdrawal and discharge volumes)".</p> <p>BMW SCoC states that it expects suppliers to "refrain from harmful changes to the soil, water and air pollution, harmful noise emissions, and excess water consumption" (Supplier Code of Conduct, p. 6). However, the company does not require suppliers to set water reduction targets.</p> <p>Terms and Conditions for the Purchase of Production Materials and Automotive Components https://b2b.bmw.com/web/b2b/einkauf-direktes-material</p> <p>BMW Supplier Code of Conduct https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2022/BMW-Group-Supplier-Code-of-Conduct-V.3.0_englisch_20221206.pdf</p> <p>2024 CDP Questionnaire https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-CDP-Climate-and-Water-Security-Questionnaire-2024.pdf</p>	0.5

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Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		1.2.5. The company has programs in place to monitor suppliers for compliance with GHG emissions targets and other environmental impacts.	1	<p>50%: The company has a process that includes reducing GHGs and other environmental impacts, and includes targets as a basis for compliance.</p> <p>OR</p> <p>25%: The company has a process that includes reducing GHGs and other environmental impacts, but lacks targets as a basis for compliance.</p> <p>PLUS</p> <p>25%: the company provides quantitative information of the number of suppliers audited and the tiers that are audited.</p> <p>25%: the company provides qualitative case studies of how they have engaged suppliers on their targets.</p>	<p>BMW uses standardized self-assessment questionnaires with emissions related requirements relating to nomination, as well as third-party audits in accordance with the audit program of the Responsible Business Alliance (RBA) and the Responsible Supply Chain Initiative (RSCI), and on-site inspections by sustainability experts of the BMW Group (BMW Supplier Code of Conduct, p. 16).</p> <p>In its 2024 Group Report (p. 178), BMW discloses the number of suppliers (12,078) that were assessed using online assessment, and the number of suppliers inspected on-site (132), although the company does not disclose the tiers that were audited.</p> <p>BMW Supplier Code of Conduct https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2022/BMW-Group-Supplier-Code-of-Conduct-V.3.0_englisch_20221206.pdf</p> <p>2022 Annual Report https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2023/bericht/BMW-Group-Report-2022-en.pdf</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p>	0.50

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Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		1.2.6. The company commits to eliminate deforestation and the conversion of all natural ecosystems from their supply chains.	1	<p>The following scores are absolute, not cumulative:</p> <p>100%: The company has time-bound targets to eliminate deforestation and the conversion of natural ecosystems from their supply chain.</p> <p>OR</p> <p>100%: The company has time-bound targets to eliminate sourcing of high-risk commodities from areas of High Carbon Stock (HCS) and High Conservation Value (HCV).</p> <p>75%: The company has time-bound targets to eliminate deforestation and conversion of natural ecosystems in the supply chain of at least one of its high-risk hard commodities, and at least one soft-commodity.</p> <p>OR</p> <p>75%: The company has time-bound targets to eliminate sourcing from areas of High Carbon Stock (HCS) and High Conservation Value (HCV) for at least one of its high-risk hard commodities, and at least one soft-commodity.</p> <p>50%: The company has time-bound targets to eliminate deforestation and conversion of natural ecosystems in the supply chain of at least one of its high-risk commodities.</p> <p>OR</p> <p>50%: The company has time-bound targets to eliminate sourcing from areas of High Carbon Stock (HCS) and High Conservation Value (HCV) for at least one of its high-risk commodities.</p> <p>25%: The company has a general commitment or policy to halt deforestation and the conversion of natural ecosystems in its supply chains, which extends beyond illegal deforestation or conversion.</p>	<p>According to its Supplier Code of Conduct (p. 7), "The BMW Group is committed to halting deforestation and the conversion of natural ecosystems in supply chains. We expect our suppliers to protect natural ecosystems and not to contribute to the changing, deforestation, or damage of natural woodland and other natural ecosystems. Where applicable, the guidelines of the High Conservation Value Resource Network (HCV) and the High Carbon Stock Approach (HCSA) are to be applied."</p> <p>BMW is a signatory of the Deforestation-Free Call to Action of the Leather Working Group and commits to source cowhides and components containing cowhide from supply chains that are free from deforestation and land conversion impacts by 2030 (Anti-deforestation policy, p. 3). BMW also commits to sourcing sustainable natural rubber, although this commitment does not have a time-bound target.</p> <p>The company has not set deforestation targets for any high-risk hard commodities.</p> <p>Anti-deforestation policy (December 2024) https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2024/202412_BMW_AntiDeforestationPolicy_EN.pdf</p> <p>BMW Supplier Code of Conduct https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2022/BMW-Group-Supplier-Code-of-Conduct-V.3.0_englisch_20221206.pdf</p> <p>High-level Commitment of the BMW Group for Sustainable Natural Rubber (February 2022) https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2022/2022_Commitment_BMW_Naturalrubber.pdf</p> <p>Biodiversity policy (December 2024) https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2024/BMW_Group_BiodiversityPolicy_EN_2024.pdf</p>	0.5

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Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
	<p>1.3. Use of supply chain levers to achieve fossil free and environmentally sustainable supply chains</p>	<p>1.3.1. The company incentivises suppliers to reduce GHG and other significant air emissions.</p>	<p>1</p>	<p>50%: the company specifies that sustainability and/or ESG are included as factors for choosing a preferred supplier.</p> <p>25%: the company specifies that GHG emissions are included in the tender and contracting process.</p> <p>25%: the company specifies that "other significant air emissions" targets are included in the tender and contracting process.</p> <p>As companies are unlikely to publish their contract information, references may be found in sustainability reports, procurement policies, etc.</p>	<p>The BMW Group has included sustainability in its supplier questionnaire and assessment (Supplier Code of Conduct). The company indicates that "We give preference to suppliers who exceed the minimum requirements set out here and are committed to ongoing development, for example by expanding the commitments described above to their supply chain" (p. 14-15). This indicates that BMW specifies that sustainability is included as a factor for choosing a preferred supplier.</p> <p>BMW also indicates that it considers the "setting of science-based emission reduction targets when releasing bidder circles for nomination process." (2024 CDP Questionnaire, p. 210).</p> <p>Supplier code of conduct (Supplier sustainability policy, June 2022) https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2022/BMW-Group-Supplier-Code-of-Conduct-V.3.0_englisch_20221206.pdf</p> <p>2024 CDP Questionnaire https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-CDP-Climate-and-Water-Security-Questionnaire-2024.pdf</p>	<p>0.75</p>

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Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		1.3.2. The company implements incentives and control systems to improve water management by suppliers	1	<p>20%: The company's Supplier Code of Conduct and / or Responsible Sourcing Policy includes specific requirements for suppliers with regards to water management and conservation (e.g. having in place a water management plan).</p> <p>40%: The company has established purchase control systems to incentivize improved water management by (potential) new suppliers (e.g. water management is explicitly taken into account in the tender process and is a factor in selecting suppliers).</p> <p>40%: The company has operationalized policies, systems and/or processes to manage risks and address impacts of water depletion/pollution by (existing) suppliers (e.g. the company discloses specific water risks it has identified as part of its supply chain risk assessment process; the company provides evidence of how they have engaged with, or suspended, noncompliant suppliers on water management, etc.). Note: generic claims (e.g. simply stating that the company assesses / manages water-related risks) are insufficient — companies must explain the specific mechanisms used and/or provide concrete examples or data to illustrate implementation.</p>	<p>BMW includes general expectations related to water in its Supplier Code of Conduct: BMW expects its suppliers to “refrain from harmful changes to the soil, water and air pollution, harmful noise emissions, and excess water consumption” (Supplier Code of Conduct, p. 6). This is part of BMW’s purchasing terms and conditions and contracts with its direct suppliers (2024 CDP Questionnaire, p. 205).</p> <p>BMW discloses in its 2024 CDP Questionnaire that water management and stewardship is included in its supplier assessment and awards scheme (p. 219). BMW assesses “nominated and potential supplier locations worldwide based on the industry-wide Drive Sustainability questionnaire (p. 205), which contains questions related to water quality, consumption, and management”, which is part of the tendering process. This indicates that water management is taken into consideration in the tender process (through the awards scheme).</p> <p>BMW’s online assessments for suppliers, based primarily on the standard sustainability questionnaire of the industry initiative Drive Sustainability, includes requirements on “policy on environment” and “responsible supply chain management, including water quality, consumption & management” in its questionnaire for suppliers. The company also indicates that it would “retain and engage” in case of supplier non-compliance with water related requirements.</p> <p>Water is also identified as an explicit environmental risk for several material supply chains in BMW’s Responsible Raw Material Report. In the same report, BMW discloses company engagement on lithium mining in Chile to promote the sustainable use of water resources in the Salar de Atacama, through a “30-point action plan for sustainable water management in Salar de Atacama – including a register of water rights, study analyses, a public library, water campaigns, and projects around drinking water supplies and the use of greywater” (Responsible Raw Material Management at the BMW Group, p.12 - 13)</p> <p>2024 CDP Questionnaire https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-CDP-Climate-and-Water-Security-Questionnaire-2024.pdf</p> <p>BMW’s self-assessment questionnaire (SAQ) for suppliers https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2022/Sustainability-Assessment-Questionnaire_SAQ_5.0_EN.pdf</p> <p>Responsible Raw Material Management at the BMW Group https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2025/Rohstoffmanagement_EN.pdf</p>	1

Company analysis - fossil-free and environmentally sustainable supply chains

Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		1.3.3. The company implements incentives and control systems to eliminate deforestation from its supply chain	1	<p>20%: The company's Supplier Code of Conduct and / or Responsible Sourcing Policy includes specific requirements for suppliers with regards to deforestation and land conversion.</p> <p>40%: The company has established purchase control systems to incentivize compliance on deforestation and land conversion by (potential) new suppliers (e.g. deforestation is explicitly taken into account in the tender process and is a factor in choosing a preferred supplier).</p> <p>40%: The company has operationalized policies, systems and/or processes to manage risks and address impacts of deforestation and land conversion by existing suppliers (e.g. the company discloses specific deforestation risks it has identified as part of its supply chain risk assessment process; the company provides evidence of how they have engaged with, or suspended, noncompliant suppliers on deforestation, etc.). Note: generic claims (e.g. simply stating that the company assesses / manages deforestation risks) are insufficient — companies must explain the specific mechanisms used and/or provide concrete examples or data to illustrate implementation.</p>	<p>BMW indicates in its Supplier Code of Conduct (p. 7) that it is “committed to halting deforestation and the conversion of natural ecosystems in supply chains” and that it expects its suppliers to “protect natural ecosystems and not to contribute to the changing, deforestation, or damage of natural woodland and other natural ecosystems”.</p> <p>In addition, BMW indicates that it “gives preference to suppliers that are committed to the principles of certified, sustainable agriculture and forestry in their land and forest use” (p. 7).</p> <p>BMW indicates that it has due diligence, traceability, complaint, and monitoring mechanisms in place to assess potential risks of deforestation within relevant supply chains (Anti-deforestation policy, p. 2). Deforestation is also identified as an explicit environmental risk for several material supply chains in BMW's Responsible Raw Material Report. In the same report, BMW discloses its involvement in the Living Rubber Project in Indonesia, which aims "to help strengthen the social and environmental resilience of the natural rubber supply chain." (Responsible Raw Material Management at the BMW Group, p.12 - 13).</p> <p>Supplier code of conduct (Supplier sustainability policy, June 2022) https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2022/BMW-Group-Supplier-Code-of-Conduct-V.3.0_englisch_20221206.pdf</p> <p>2024 CDP Questionnaire https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-CDP-Climate-and-Water-Security-Questionnaire-2024.pdf</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p> <p>Responsible Raw Material Management at the BMW Group https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2025/Rohstoffmanagement_EN.pdf</p>	1

Company analysis - fossil-free and environmentally sustainable supply chains

Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
2. Fossil Free and Environmentally Sustainable Steel	2.1. Disclosure of scope 3 GHG emissions due to steel supply chains	2.1.1. The company discloses disaggregated GHG emissions for their steel supply chains.	1	<p>The following scores are absolute, not cumulative:</p> <p>100%: The company discloses scope 3 GHG emissions for purchased goods and services, disaggregated for their steel supply chains</p> <p>50%: The company discloses a Life Cycle Assessment (LCA) for at least one electric vehicle model that includes disaggregated data on the embodied GHG emissions from the steel used in that vehicle.</p>	<p>BMW discloses Scope 3 GHG emissions for purchased goods and services, but it is not disaggregated for the steel supply chain (2024 Annual Report, p. 196).</p> <p>BMW's disclosed LCAs for EV models also do not include disaggregated GHG emissions data from steel used in the vehicle.</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p> <p>BMW Group Vehicle Footprint Reports section of BMW sustainability webpage https://www.bmwgroup.com/en/sustainability.html</p>	0
	2.2. Target setting and progress towards fossil free and environmentally sustainable steel supply chains	2.2.1. The company has set targets for the use of fossil free and environmentally sustainable steel.	2	<p>The scores below are absolute, not cumulative:</p> <p>100%: the company has a commitment to source 100% fossil-free steel by 2040, and has set interim targets to source at least 10% fossil-free steel AND 50% lower emission steel by 2030.</p> <p>80%: the company has a commitment to source 100% fossil-free steel by 2050, and has set interim targets to source at least 10% fossil-free steel AND 50% lower emission steel by 2030.</p> <p>60%: the company has set a target to source at least 10% fossil-free steel OR 50% lower emission steel by 2030.</p> <p>40%: the company has set an emissions reduction target for its steel supply chain that is aligned with the IEA Net Zero Roadmap (2023 version), specifically a 27% reduction by 2030 and 90% by 2050.</p> <p>20%: the company has a commitment to net zero steel by 2050 and/or a 2030 steel supply chain emissions reduction target that falls short of the above-mentioned thresholds.</p> <p>Note: For definitions of fossil-free steel and lower emission steel used in this indicator and those below, as well as comparisons with definitions from other standards and schemes, please refer to the methodology document.</p>	<p>BMW recognizes the role of CO2-reduced steel in decarbonization, indicating that "by using CO2e-reduced manufacturing processes or higher proportions of recyclates, CO2e emissions can be reduced by up to 80% for aluminium and up to 70% for steel!" (2024 Group Report, p. 122). However, the company does not disclose a specific target for steel.</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p>	0

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Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		2.2.2. The company publishes progress towards their target by disclosing the current percentage of fossil-free and/or lower emission steel in their annual production cycle.	1	<p>The scores below are absolute, not cumulative:</p> <p>100%: The company discloses the current percentage of lower emission and/or fossil-free steel in its production cycle</p> <p>50%: The company partially discloses the quantity of fossil-free and/or lower emission steel used in its annual production cycle, e.g., in the form of an absolute amount instead of a percentage or only for some elements within its annual production cycle.</p>	Not disclosed.	0
		2.2.3. The company has a target for the use of recycled steel by 2030.	2	<p>The scores below are absolute, not cumulative:</p> <p>100%: the company discloses a target to use at least 38% recycled steel by 2030, aligned with the IEA Net Zero Roadmap (2023 version). The target includes a specific commitment or target for increasing the use of post-consumer scrap.</p> <p>75%: the company discloses a target to use at least 38% of recycled steel by 2030, but does not specify a target for post-consumer scrap.</p> <p>50%: the company discloses a target for the use of recycled steel below the 38% threshold and lacks detail on scrap type.</p>	<p>BMW recognizes the role of secondary materials and CO2-reduced steel in decarbonization (2024 Group Report, p. 122). However, the company has not set a relevant target.</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p>	0
		2.2.4. The company publishes progress towards their target by disclosing the current percentage of recycled steel used in its annual production cycle.	1	<p>The scores below are absolute, not cumulative:</p> <p>100%: the company discloses the percentage of recycled steel in their annual production cycle including volumes of both pre- and post-consumer steel. NB: Total recycled/scrap steel volume is sufficient if total steel volume is disclosed.</p> <p>75%: the company discloses the percentage of recycled steel in their annual production cycle.</p> <p>50%: The company partially discloses the quantity of recycled steel used in its annual production cycle, e.g., in the form of an absolute amount instead of a percentage or only for some elements within its annual production cycle.</p>	Not disclosed.	0

Company analysis - fossil-free and environmentally sustainable supply chains

Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
	<p>2.3. Use of supply chain levers to achieve fossil free and environmentally sustainable steel supply chains</p>	<p>2.3.1. The company participates in multi-stakeholder procurement initiatives to collaborate with other buyers to incentivise investment in and production of fossil free steel at scale.</p>	1	<p>50%: the company is a member of SteelZero.</p> <p>50%: the company is a member of the First Movers Coalition's sector group on steel</p>	<p>The company is neither a member of SteelZero, nor a member of FMC steel sector group.</p> <p>https://www.theclimategroup.org/steelzero-members</p>	0
		<p>2.3.2. The company participates in multi-stakeholder standard / certification initiatives to drive investment in and production of socially and environmentally sustainable steel at scale.</p>	1	<p>25%: the company is a member of ResponsibleSteel.</p> <p>50%: the company actively engages their steel suppliers regarding ResponsibleSteel certification.</p> <p>25%: the company has disclosed purchasing agreements for ResponsibleSteel certified steel.</p> <p>Note: 0.6 points modifier applied due to multistakeholder initiative assessment. See sheet 8.</p>	<p>The company is not a member of ResponsibleSteel. <u>https://www.responsiblesteel.org/members-and-associates</u></p>	0

Company analysis - fossil-free and environmentally sustainable supply chains

Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		2.3.3. The company has entered into formal arrangements with suppliers to incentivise investment in and greater production of fossil free steel.	2	<p>50%: the company states that it has entered into a formal arrangement with at least one steel supplier to invest in and scale-up production of lower emission or fossil-free steel.</p> <p>25%: at least one purchase agreement signed by the company with a steel supplier for the provision of lower emission or fossil-free steel is a binding contract for which timelines and scale of supply (e.g. volume of steel to be purchased per year) are publicly disclosed.</p> <p>25%: at least one purchase agreement signed by the company is for the provision of steel produced with breakthrough technologies for fossil-free steelmaking.</p>	<p>The company discloses that it has invested in US start-up Boston Metal for "carbon free" steel production in its 2022 Group Report (p. 107) and indicated that it has increased its stake in Boston Metal in April 2023 in its 2023 Group Report (p. 107). However, no additional details are provided.</p> <p>In addition, in the 2021 Group Report (p. 71), BMW previously disclosed a contractual relationship with H2 Green Steel (which changed its name to Stegra as of 2024) to purchase hydrogen steel made with green energy. However, the volume and timeline of supply are not disclosed.</p> <p>BMW has also noted in a press release (February 2022) that it has entered into a contract with Salzgitter AG with the agreement for Salzgitter to start supplying low-carbon steel 2026 onwards. BMW also notes in another press release agreements it has signed for low-carbon steel in China, the U.S. and Mexico (15 Nov 2022). However, these agreements are not included or referenced in any official reporting, and are thus not taken into consideration for scoring.</p> <p>Group Report 2023 https://www.bmwgroup.com/en/report/2023/downloads/BMW-Group-Report-2023-en.pdf?page=1</p> <p>Group Report 2022 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2023/bbericht/BMW-Group-Report-2022-en.pdf</p> <p>Group Report 2021 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2022/bbericht/BMW-Group-Report-2021-en.pdf</p> <p>Press release upon agreement with Salzgitter AG (Feb 2022) https://www.press.bmwgroup.com/global/article/detail/T0366153EN/bmw-group-significantly-increases-use-of-low-carbon-steel-in-series-production-at-european-plants</p> <p>Press release on agreements for CO2-reduced steel in China, Mexico and the U.S. (15 Nov 2022) https://www.press.bmwgroup.com/global/article/detail/T0405678EN/bmw-group-secures-co2-reduced-steel-for-global-production-network</p>	1.5

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Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		2.3.4. The company integrates improved recyclability of steel into automobile design and manufacturing.	2	<p>25%: the company discloses that it is implementing a closed-loop process for steel recycling (must include reference to post-consumer scrap).</p> <p>OR</p> <p>10%: the company discloses that it is implementing a closed-loop process for steel recycling (no reference to post-consumer scrap).</p> <p>PLUS</p> <p>25%: the company provides a qualitative description of the closed-loop process(es) it is implementing for steel recycling.</p> <p>25%: the company discloses that it improves the recyclability of steel through automotive and/or component design.</p> <p>25%: the company explains how it has used automotive and/or component design to improve the recyclability of steel (e.g. by minimizing copper contamination).</p>	<p>BMW discloses in its 2024 Group Report (p. 28), that “ We are working with partners to establish a circular economy that enables high-quality recycling of steel, aluminium, glass and plastic. We ourselves will increase the proportion of secondary material in our vehicles in the future along the ‘Secondary First’ principle.” It is unclear whether this process is for post-consumer steel or is limited to manufacturing scrap, and no additional details are disclosed.</p> <p>BMW discloses that it applies “design for circularity” principles and that “to advance a circular economy approach to product development, the BMW Group is committed to drawing up global strategies for materials and components, with a particular focus on key materials such as steel, aluminium, battery materials, and thermoplastics” (2024 Group Report, p. 144). However, the company does not provide explain or provide any concrete examples of how it has applied automotive/component design to improve the recyclability of steel.</p> <p>BMW also discloses that it supports a Car2Car project which focuses on the recycling of raw materials including steel, and donates its vehicles to “improve the quality of secondary raw materials obtained from the recycling of end-of-life vehicles”. The Car2Car project “began in January 2023 and is expected to run until December 2025” (2024 Group Report, p. 145). Although this project is an example of an initiative to advance the recycling of post-consumer steel scrap, it appears to be an R&D/pilot project that BMW is participating in to improve post-consumer steel scrap recycling. It is therefore considered an example of improving the recyclability of steel through automotive and component design.</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p>	0.7
3.Fossil Free and Environmentally Sustainable Aluminium	3.1. Disclosure of scope 3 GHG emissions due to aluminium	3.1.1. The company discloses disaggregated GHG emissions for their aluminium supply chains.	1	<p>The following scores are absolute, not cumulative:</p> <p>100%: The company discloses scope 3 GHG emissions for purchased goods and services, disaggregated for their aluminum supply chains</p> <p>50%: The company discloses a Life Cycle Assessment (LCA) for at least one electric vehicle model that includes disaggregated data on the embodied GHG emissions from the aluminum used in that vehicle.</p>	<p>BMW discloses Scope 3 GHG emissions for purchased goods and services, but it is not disaggregated for the aluminium supply chain (2024 Annual Report, p. 196). BMW’s disclosed LCAs for EV models also do not include disaggregated GHG emissions data from aluminium used in the vehicle.</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p> <p>BMW Group Vehicle Footprint Reports section of BMW sustainability webpage https://www.bmwgroup.com/en/sustainability.html</p>	0

Company analysis - fossil-free and environmentally sustainable supply chains

Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
	<p>3.2. Target setting and progress towards fossil free and environmentally sustainable aluminum supply chains</p>	<p>3.2.1 The company has set targets for the use of fossil free and environmentally sustainable aluminium</p>	<p>2</p>	<p>The scores below are not additive. They indicate specific thresholds for getting that percentage of points:</p> <p>100%: the company has a commitment to source 100% fossil-free aluminium by 2040, with interim targets for all procured primary aluminium to be produced with low-carbon power by 2035 and to source at least 10% fossil-free aluminium by 2030</p> <p>80%: the company has set a target that is aligned with Mission Possible 1.5 scenario: to ensure all primary aluminium is produced with low-carbon power by 2035</p> <p>60%: the company has set a target of procuring at least 10% fossil-free aluminium by 2030</p> <p>40%: the company has set an emissions reduction target for its aluminium supply chain that is aligned with the IEA Net Zero Roadmap (2023 version), specifically a 27% reduction by 2030 and by 95% by 2050</p> <p>20%: the company has a commitment to net zero aluminium by 2050 and/or a 2030 emissions reduction target for its aluminium supply chain that falls short of the above-mentioned thresholds</p> <p>Note: For definitions of fossil-free aluminium and lower emission aluminium used in this indicator and those below, as well as comparisons with definitions from other standards and schemes, please refer to the methodology document.</p>	<p>BMW recognizes the role of CO2-reduced aluminium in decarbonization, indicating that “by using CO2e-reduced manufacturing processes or higher proportions of recyclates, CO2e emissions can be reduced by up to 80% for aluminium and up to 70% for steel” (2024 Group Report, p. 122). However, the company has not disclosed a relevant target.</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p>	<p>0</p>

Company analysis - fossil-free and environmentally sustainable supply chains

Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		3.2.2. The company publishes progress towards their target by disclosing the current percentage of fossil-free and/or lower emission aluminium in their annual production cycle	1	<p>The following scores are absolute, not cumulative:</p> <p>100%: The company discloses the current percentage of fossil-free and/or lower emission aluminium in its supply chain</p> <p>50%: The company partially discloses the quantity of fossil-free and/or lower emission aluminum used in its annual production cycle, e.g., in the form of an absolute amount instead of a percentage or only for some elements within its annual production cycle.</p>	Not disclosed.	0
		3.2.3. The company has a target to increase use of recycled aluminium by 2030.	2	<p>These scores are not cumulative, they are thresholds for achieving a particular score.</p> <p>100%: the company discloses a target to use at least 42% recycled aluminium by 2030, aligned with the IEA Net Zero Roadmap (2023 version). The target includes a specific commitment or target for increasing the use of post-consumer aluminium scrap.</p> <p>75%: the company discloses a target to use at least 42% of recycled aluminium by 2030, but does not specify a target for post-consumer scrap</p> <p>50%: the company discloses a target for the use of recycled steel below the 42% threshold and lacks detail on scrap type</p>	<p>BMW recognizes the role of secondary materials and CO2-reduced aluminium in decarbonization (2024 Group Report, p. 122). However, the company has not disclosed any relevant target.</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p>	0
		3.2.4. The company publishes progress towards their target by disclosing the current percentage of recycled aluminium used in its annual production cycle	1	<p>These scores are not cumulative, they are thresholds for achieving a particular score:</p> <p>100%: the company discloses the percentage of recycled aluminium in their annual production cycle including volumes of both pre- and post-consumer aluminium. NB: Total recycled/scrap steel volume is sufficient if total steel volume is disclosed.</p> <p>75%: the company discloses the percentage of recycled aluminium in their annual production cycle.</p> <p>50%: The company partially discloses the quantity of recycled aluminum used in its annual production cycle, e.g., in the form of an absolute amount instead of a percentage or only for some elements within its annual production cycle.</p>	<p>BMW disclosed that "Since 2024, the MINI Countryman has used cast wheels containing 70% secondary aluminium." There is no further disclosure of the percentage of recycled aluminium used in its entire annual production cycle.</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p>	0.5

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Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
	<p>3.3. Use of supply chain levers to achieve fossil free and environmentally sustainable aluminium supply chains</p>	<p>3.3.1. The company participates in multi-stakeholder procurement initiatives to collaborate with other buyers to incentivise investment in and production of fossil free aluminium at scale.</p>	1	<p>100%: the company is a member of First Movers Coalition sector group on aluminium</p>	<p>The company is not a member of FMC sector group on aluminium. https://initiatives.weforum.org/first-movers-coalition/community</p>	0
		<p>3.3.2. The company participates in multi-stakeholder standard / certification initiatives to drive investment in and production of socially and environmentally sustainable aluminium</p>	1	<p>25%: the company is a member of the Aluminum Stewardship Initiative (ASI). 50%: the company actively engages their aluminum suppliers regarding ASI certification. 25%: the company has disclosed purchasing commitments for ASI certified aluminum. Note: 0.4 points modifier applied due to multistakeholder initiative assessment. See sheet 8.</p>	<p>BMW is a member of the Aluminum Stewardship Initiative (ASI). It is unclear to what extent BMW actively engages the suppliers regarding ASI certification.</p> <p>BMW discloses “Direct sourcing of ASI-certified (CoC) material” as a preventive measure in response to the environmental risks of bauxite mining disclosed in its Responsible Raw Materials Management Report (p. 3). However, the company does not indicate whether this is actively being implemented or a future plan. BMW discloses in the 2024 Group Report (p. 206) regarding ASI that “The objective of this collaboration is to create a uniform international basis for the certification of raw material production and processing and to increase the acceptance and adoption of recognised standards.” However, BMW does not elaborate on how it engages aluminium suppliers regarding ASI certification. Thus it does not get points for the second sub-indicator.</p> <p>https://aluminium-stewardship.org/about-asi/members</p> <p>Responsible Raw Materials Management at the BMW Group (RRMM report) https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2025/Rohstoffmanagement_EN.pdf</p>	0.1

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Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		3.3.3. The company has entered into formal arrangements with suppliers to incentivise investment in and greater production of fossil free aluminium	2	<p>50%: the company states that it has entered into a formal arrangement with at least one aluminium supplier to invest in and scale-up production of lower emission or fossil-free aluminium.</p> <p>25%: at least one purchase agreement signed by the company with an aluminium supplier for the provision of lower emission or fossil-free aluminium is a binding contract for which timelines and scale of supply (e.g. volume of aluminium to be purchased per year) are publicly disclosed.</p> <p>25%: at least one purchase agreement signed by the company is for the provision of aluminium produced with new technologies for fossil-free aluminium production.</p>	<p>It was announced in a press release that BMW signed an agreement to produce reduced CO2 aluminium with Rio Tinto. It was also announced in a press release that more than a third of aluminium used at BMW Group’s light metal foundry in Landshut is made in Dubai using solar power. But this has not been disclosed as part of official reporting and is therefore not eligible for scoring.</p> <p>Rio Tinto agreement - https://www.press.bmwgroup.com/global/article/detail/T0409442EN/70-percent-less-co2:-bmw-group-plans-to-source-aluminium-from-sustainable-production-in-canada-from-2024?language=en</p> <p>Landshut announcement https://www.bmwgroup.com/en/news/general/2024/decarbonisation.html</p>	0
		3.3.4. The company integrates improved recyclability of aluminium into automobile design and manufacturing.	2	<p>25%: the company discloses that it is implementing a closed-loop process for aluminium recycling (must include reference to post-consumer scrap).</p> <p>OR</p> <p>10%: the company discloses that it is implementing a closed-loop process for aluminium recycling (no reference to post-consumer scrap).</p> <p>PLUS</p> <p>25%: the company provides a qualitative description of the closed-loop process(es) it is implementing for aluminium recycling.</p> <p>25%: the company discloses that it improves the recyclability of aluminium through automotive and/or component design.</p> <p>25%: the company explains how it has used automotive and/or component design to improve the recyclability of aluminium (e.g. through the development of new alloys).</p>	<p>BMW discloses in its 2024 Group Report (p. 28), that “ We are working with partners to establish a circular economy that enables high-quality recycling of steel, aluminium, glass and plastic. We ourselves will increase the proportion of secondary material in our vehicles in the future along the ‘Secondary First’ principle.” It is unclear whether this process is for post-consumer aluminium or is limited to manufacturing scrap, and no additional details are disclosed.</p> <p>BMW discloses that it applies “design for circularity” principles and that “To advance a circular economy approach to product development, the BMW Group is committed to drawing up global strategies for materials and components, with a particular focus on key materials such as steel, aluminium, battery materials, and thermoplastics” (2024 Group Report, p. 144). However, the company does not provide explain how it has applied automotive/component design to improve the recyclability of aluminium specifically.</p> <p>BMW also discloses that it supports a Car2Car project which focuses on the recycling of raw materials including aluminium, and donates its vehicles to “improve the quality of secondary raw materials obtained from the recycling of end-of-life vehicles”. The Car2Car project “began in January 2023 and is expected to run until December 2025” (2024 Group Report, p. 145). Although this project is an example of an initiative to advance the recycling of post-consumer aluminium scrap, it appears to be an R&D/pilot project that BMW is participating in to improve post-consumer aluminium scrap recycling. It is therefore considered an example of improving the recyclability of aluminium through automotive and component design.</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p>	0.7

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Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
4. Fossil Free and Environmentally Sustainable Batteries	4.1. Disclosure of scope 3 GHG emissions due to battery supply chains	4.1.1. The company discloses disaggregated scope 3 emissions for their battery supply chains, including a total for the whole battery and disaggregated emissions for key battery minerals (cathode / anode active materials)	1	<p>The following scores are absolute, not cumulative:</p> <p>100%: the company provides scope 3 GHG emissions their battery supply chain, disaggregated for cell production / manufacturing and key cathode / anode active materials (i.e. individual minerals) used in the battery</p> <p>75%: the company provides scope 3 GHG emissions their battery supply chain, disaggregated for cell production / manufacturing and cathode and anode active materials (as a total)</p> <p>50%: The company discloses scope 3 GHG emissions for purchased goods and services, disaggregated for their battery supply chain.</p> <p>25%: The company discloses a Life Cycle Assessment (LCA) for at least one electric vehicle model that includes disaggregated data on the embodied GHG emissions from the battery used in that vehicle.</p>	Not disclosed.	0
	4.2. Target setting and progress towards fossil free and environmentally sustainable battery supply chains	4.2.1. The company has set a target to produce fossil free and environmentally sustainable batteries.	1	<p>The scores below are not additive. They indicate specific thresholds for getting that percentage of points:</p> <p>100%: the company has a commitment to produce 100% fossil free batteries by 2040 and a target to reduce their battery supply chain emissions by 50% by 2030.</p> <p>75%: the company has a commitment to produce 100% fossil free batteries by 2050 and a target to reduce their battery supply chain emissions by 50% by 2030.</p> <p>50%: the company has set an emissions reduction target for its battery supply chain that is aligned with the IEA Heavy Industry Guidance, specifically a 27% emissions reduction by 2030 and 95% by 2050.</p> <p>25%: the company has a commitment to net zero batteries by 2050 and/or a 2030 emissions reduction target for its battery supply chain that falls short of the above-mentioned thresholds.</p>	Not disclosed.	0

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Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		4.2.2. The company has set a target to reduce reliance on energy intensive minerals in battery production.	1	<p>25%: statement of intent to reduce high intensity minerals in battery production (which may include a commitment to producing smaller batteries).</p> <p>25%: the company has set a disaggregated target for the reduction of primary sources of nickel in their supply chain.</p> <p>25%: the company has set a disaggregated target for the reduction of primary sources of lithium in their supply chain.</p> <p>25%: the company has set a disaggregated target for the reduction of primary sources of cobalt in their supply chain.</p> <p>Note: The final three scoring criteria can also be met by setting targets for increasing the % recycled nickel/lithium/cobalt used in new batteries.</p>	<p>While BMW announced that batteries for its Neue Klasse range will contain recycled cobalt, lithium and nickel, the company has not disclosed a broader target (2024 Group Report, p. 144).</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p>	0
		4.2.3. The company has set collection and/or recovery targets for high intensity battery metals.	1	<p>100%: the company has a medium term target of 95% recovery for cobalt & nickel with 70% lithium by 2030 (equal to that proposed by the EU) and a short term target of 90% recovery rate for cobalt & nickel and 35% lithium by 2025.</p> <p>25%: the company has set collection and/or recovery targets for high intensity battery metals that are lower and/or not disaggregated.</p> <p>Note: companies that disclose recovery rates already achieved at commercial scale and/or with existing supplier requirements on recovery rates may score points for this indicator if the disclosed recovery rates match the 2025 thresholds (25% of points) or the 2030 thresholds (100% of points).</p>	Not disclosed.	0

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Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
	<p>4.3. Use of supply chain levers to achieve fossil free and environmentally sustainable battery supply chains</p>	<p>4.3.1. The company requires all battery manufacturers to use 100% renewable electricity</p>	<p>2</p>	<p>The following scores are absolute, not cumulative: 100%: the company discloses a requirement that all battery manufacturers are required to use 100% renewable electricity. 50%: the company discloses agreements/requirements for 100% renewable energy with some battery manufacturers 25%: the company discloses agreements/requirements for reduced emissions with some battery manufacturers or 50%: the company discloses a requirement that all battery manufacturers are required to be "carbon neutral", "net zero" or similar but does not define how they are using the term.</p>	<p>BMW discloses that it has introduced "green electricity as a mandatory criterion for awarding new contracts in our supply chain" (2024 CDP Questionnaire, p. 162). BMW also indicates on its website (Circular Economy & CO2 Reduction section) that "Our battery cell suppliers are already required to use 100 percent energy from regenerative sources, as stipulated in our contracts with them." This was also mentioned in its 2021 Group Report (p. 79): "In 2020, we entered into contractual agreements with battery cell manufacturers to use only energy generated from renewable sources to produce the current generation of battery cells." However, it is unclear if this applies only to new contracts, or also applies to existing suppliers.</p> <p>BMW also discloses in its 2024 Group Report (p. 64) that "The use of secondary materials and the use of electricity from renewable sources in particular in battery cell production significantly reduce the Group's carbon equivalent footprint. The measures taken in this regard were either agreed upon separately in sustainability agreements or taken into account in the award of projects." According to BMW, "In 2023, the number of such contractual agreements with suppliers specifying decarbonisation measures, including green electricity, rose to 707." (2024 CDP Questionnaire, p. 212). These agreements supposedly also include those with battery cell producers.</p> <p>Based on the above information, we can conclude that BMW has agreements for 100% renewable energy with some battery manufacturers, but it is unclear if all existing battery suppliers are required to use 100% renewable electricity.</p> <p>2024 CDP Questionnaire https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-CDP-Climate-and-Water-Security-Questionnaire-2024.pdf</p> <p>BMW Group Report 2021 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2022/bericht/BMW-Group-Report-2021-en.pdf</p> <p>https://www.bmwgroup.com/en/sustainability/circular-economy.html</p>	<p>1</p>

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Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		<p>4.3.2. Company engages and/or enters into formal agreements with extractives and other value chain companies to prevent/mitigate adverse environmental impacts of lithium sourcing.</p>	1	<p>25%: the company has identified and disclosed specific environmental risks of lithium sourcing (e.g. air pollution, water, biodiversity etc.).</p> <p>25%: the company describes its overall approach or strategy to prevent/mitigate environmental risks and adverse impacts within its lithium supply chain (e.g. incorporating environmental conditions into contracts with suppliers, participating in multi-stakeholder initiative(s) to address environmental impacts of lithium sourcing etc.).</p> <p>25%: the company has entered into contractual agreements for the purchase of low-carbon lithium. These agreements may include joint ventures, purchasing commitments, and/or other forms of investment, including R&D.</p> <p>25%: the company provides examples or case studies of contractual agreements and/or direct engagement with specific lithium mining or refining companies to address environmental risks and adverse impacts. Note: examples of direct engagement can be with direct or indirect suppliers. In order to score points here, the company must provide the name of the lithium supplier and the location of the mine or project in question, and it must be clear the engagement / agreement addresses environmental impacts specifically.</p>	<p>BMW recognizes specific environmental risks from lithium sourcing, including “water consumption in arid areas and use” (Responsible Raw Materials Management at the BMW Group, p. 11). The company also mentions water risks from lithium mining in its 2024 CDP Questionnaire (p. 219).</p> <p>BMW discloses a range of preventative measures it is undertaking to address these risks in its lithium supply chain, including supplier certification; the establishment of a traceability system; investments in innovative extractive technologies to reduce environmental impacts; and participating in multi-stakeholder initiatives such as the Responsible Lithium Partnership, which aims to achieve a shared understanding of responsible natural resource management with local interest groups and to develop a vision for the future of the Salar de Atacama salt flat in Chile. The Responsible Lithium Partnership project also commissioned a scientific study by the University of Alaska Anchorage and the University of Massachusetts Amherst to investigate the effects of lithium mining on local water balances in Latin America. BMW also discloses that as part of this project, the Mesa Multiactor (multi-stakeholder roundtable) brings together around 20 organisations to work on a 30-point action plan for sustainable water management in Salar de Atacama – including a register of water rights, study analyses, a public library, water campaigns, and projects around drinking water supplies and the use of greywater (Responsible Raw Materials Management at the BMW Group, p. 12).</p> <p>BMW provides examples of contractual agreements it has signed with specific lithium mining companies to address environmental risks, specifically by minimizing resource use and enhancing resource efficiency. These include investment into startups Lilac Solutions, which is “developing an ion-exchange lithium extraction technology with enhanced recovery rates, reduced impurities, and lower acid consumption”, as well as Mangrove Lithium that is “working on an electrochemical process for producing high-purity, battery-grade lithium hydroxide more cost-effectively.” (2024 Group Report, p. 145). In BMW’s 2022 Group Report (p. 107) the company explained how the technologies developed by these two companies facilitate the extraction of lithium in “a far more eco- and resource-friendly way than previously possible.”</p> <p>However, BMW does not disclose any offtake agreement for low-carbon lithium specifically.</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p> <p>Responsible Raw Materials Management at the BMW Group (RRMM report) https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2025/Rohstoffmanagement_EN.pdf</p> <p>BMW Group investiert in innovatives Verfahren für effizienten und nachhaltigen Lithiumabbau (Press release cited in RRMM report) https://www.press.bmwgroup.com/deutschland/article/detail/T0347452DE/bmw-group-investiert-in-</p>	0.75

Company analysis - fossil-free and environmentally sustainable supply chains

Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		<p>4.3.3. Company engages and/or enters into formal agreements with extractives and other value chain companies to prevent/mitigate adverse environmental impacts of nickel sourcing.</p>	1	<p>25%: the company has identified and disclosed specific environmental risks of nickel sourcing (e.g. air pollution, water, biodiversity etc.).</p> <p>25%: the company describes its overall approach or strategy to prevent/mitigate environmental risks and adverse impacts within its nickel supply chain (e.g. incorporating environmental conditions into contracts with suppliers, participating in multi-stakeholder initiative(s) to address environmental impacts of nickel sourcing etc.).</p> <p>25%: the company has entered into contractual agreements for the purchase of low-carbon nickel. These agreements may include joint ventures, purchasing commitments, and/or other forms of investment, including R&D.</p> <p>25%: the company provides examples or case studies of contractual agreements and/or direct engagement with specific nickel mining or refining companies to address environmental risks and adverse impacts. Note: examples of direct engagement can be with direct or indirect suppliers. In order to score points here, the company must provide the name of the nickel supplier and the location of the mine or project in question, and it must be clear the engagement / agreement addresses environmental impacts specifically.</p>	<p>BMW discloses specific environmental risks of nickel sourcing, including “mining waste on water, soil and air, e.g. from tailings and acid mine drainage; CO2 emissions, especially from fossil fuel use in mining and processing; Deforestation and the associated loss of biodiversity” (Responsible Raw Material Management at the BMW Group, p. 19).</p> <p>BMW also discloses “preventive measures” it is implementing in response to these identified environmental risks. However, these are all extremely broad (e.g. “Contractual assurance by suppliers of compliance with ESG standards” and “Establishment of traceability systems”) and it is therefore unclear if these are future plans or already operational.</p> <p>The company does not disclose any contractual agreements for the supply of low-carbon lithium or any examples of engagement with specific lithium companies to address adverse environmental impacts.</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p> <p>Responsible Raw Material Management at the BMW Group https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2025/Rohstoffmanagement_EN.pdf</p>	0.25

Company analysis - fossil-free and environmentally sustainable supply chains

Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		<p>4.3.4. Company engages and/or enters into formal agreements with extractives and other value chain companies to prevent/mitigate adverse environmental impacts of cobalt sourcing.</p>	1	<p>25%: the company has identified and disclosed specific environmental risks of cobalt sourcing (e.g. air pollution, water, biodiversity etc.).</p> <p>25%: the company describes its overall approach or strategy to prevent/mitigate environmental risks and adverse impacts within its cobalt supply chain (e.g. incorporating environmental conditions into contracts with suppliers, participating in multi-stakeholder initiative(s) to address environmental impacts of lithium sourcing etc.).</p> <p>25%: the company has entered into contractual agreements for the purchase of low-carbon cobalt. These agreements may include joint ventures, purchasing commitments, and/or other forms of investment, including R&D.</p> <p>25%: the company provides examples or case studies of contractual agreements and/or direct engagement with specific cobalt mining or refining companies to address environmental risks and adverse impacts. Note: examples of direct engagement can be with direct or indirect suppliers. In order to score points here, the company must provide the name of the cobalt supplier and the location of the mine or project in question, and it must be clear the engagement / agreement addresses environmental impacts specifically.</p>	<p>BMW discloses specific environmental risks it has identified from cobalt sourcing, including “Environmental impacts of mining waste on water, soil, air and people, e.g. from acidic and toxic mine water; Deforestation and the associated loss of biodiversity” (Responsible Raw Material Management at the BMW Group, p. 4).</p> <p>BMW also discloses broad “preventive measures” in response to these identified environmental risks. However, it is unclear if these are future plans or already operational.</p> <p>The company does not disclose any offtake agreement for low-carbon cobalt or direct engagement with cobalt companies to address adverse environmental impacts. BMW does disclose that it part of the Implementation of Cobalt for Development field project. However, according to the project goal disclosed by BMW, specifically “to promote sustainable development by enabling access to education and alternative sources of income, and increasing financial resilience among mining communities in the DR Congo”, the project does not explicitly involve preventing/mitigating environmental risks. As a result, the company does not get points for the last sub-indicator.</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p> <p>Responsible Raw Material Management at the BMW Group https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2025/Rohstoffmanagement_EN.pdf</p>	0.25

Company analysis - fossil-free and environmentally sustainable supply chains

Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		4.3.5. The company participates in multi-stakeholder initiatives to collaborate with other buyers to incentivise investment in and production of fossil free and environmentally sustainable batteries at scale.	1	100%: the company is a member of the Global Battery Alliance.	BMW is a member of the Global Battery Alliance https://www.globalbattery.org/about/members/	1
		4.3.6. The company invests in the development of new battery chemistries & technologies that minimize their overall material and carbon footprint by reducing the use of emissions-intensive minerals and toxic materials	2	<p>25%: the company provides examples of R&D that they are conducting in-house or in partnership with value chain partners to develop new battery chemistries / technologies that reduce the use of emissions-intensive minerals (such as nickel and cobalt). Note: this could include R&D into the development of smaller batteries.</p> <p>25%: the company provides examples of the systems and processes it is developing to scale this R&D to commercial production.</p> <p>50%: the company has brought to market electric vehicles that utilize battery chemistries / technologies that meet the above criteria.</p>	<p>BMW holds shares in Solid Power, an industry leading manufacturer of solid-state batteries for electric vehicles" (2024 Group Report, p. 301). The company does not provide further disclosure regarding scaling up the R&D.</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p>	0.5

Company analysis - fossil-free and environmentally sustainable supply chains

Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		4.3.7. The company invests in the development of new battery designs, technologies, systems and/or processes to maximize the safe and effective recycling of EV batteries	1	<p>25%: the company provides examples of R&D that they are conducting in-house or in partnership with value chain partners to improve the recyclability of batteries (i.e. recovery rates). Note this could include R&D into battery design and/or recycling methods.</p> <p>25%: the company provides examples of the systems and processes it is developing to scale this R&D to commercial production.</p> <p>50%: the company provides examples of battery recycling processes it has developed in-house or in partnership with value chain partners that have achieved recovery rates of at least 95% cobalt/nickel & 70% lithium. Note disclosed recovery rates achieved at the pilot / R&D stage are valid for points here. Disclosure of recovery rates achieved at commercial scale is evaluated in indicator 4.3.10.</p>	<p>BMW discloses that it applies “design for circularity” principles and that “To advance a circular economy approach to product development, the BMW Group is committed to drawing up global strategies for materials and components, with a particular focus on key materials such as steel, aluminium, battery materials, and thermoplastics” (2024 Group Report, p. 144). However, the company does not provide any example of R&D into battery design to improve the recyclability of batteries.</p> <p>On its webpage on circular economy, BMW indicates that “Since late 2024 the BMW Group has been establishing a closed loop in battery production to recover cobalt, nickel and lithium from used high-voltage batteries.” However, the company does not provide further detail regarding whether this is at the pilot stage or is at the commercial operation stage. Nor does it mention the recovery rate achieved at the R&D/pilot stage.</p> <p>2024 Group Report</p> <p>Webpage on circular economy</p>	0
		4.3.8. The company has established processes for battery repair, reuse and repurposing in order to maximize the usable lifespan of its EV batteries.	1	<p>25%: the company indicates that there are processes in place (such as inspection, design, access to battery information, collection and transportation, etc.) for repairing, reusing and/or repurposing batteries.</p> <p>25%: the company provides qualitative information about processes (including the establishment and operation of collection points) to increase the % of batteries being collected for reuse, repurposing and/or recycling</p> <p>50%: the company provides quantitative information about the collection of batteries (i.e total numbers and / or percentages of batteries collected).</p>	<p>BMW indicates that it has organized “the return of end-of-life vehicles for recycling at more than 2,800 collection points in 32 countries” (2024 Group Report, p. 145). However, there is no disclosure of collection points for batteries or repurposing initiatives for batteries.</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p>	0

Company analysis - fossil-free and environmentally sustainable supply chains

Theme	Indicator Category	Indicators	Total Number of Points	Score Attribution (Scores are cumulative unless otherwise specified)	BMW Group Analysis	BMW Group Points
		4.3.9. The company has established closed-loop processes in order to maximize the recycling of end-of-life EV batteries	1	<p>25%: the company indicates that there is a closed-loop process in place for recycling batteries (that involves recovering raw materials).</p> <p>25%: the company provides detail on the battery recycling process / method(s) used and discloses that they do not use incineration / high-temperature combustion processes.</p> <p>50%: the company provides quantitative information about the % of batteries currently being recycled (at commercial scale). Note: this could be mineral recovery rates and/or the total percentage of batteries recycled (out of all batteries collected for end-of-life treatment).</p>	<p>BMW discloses that its Chinese subsidiary, BMW Brilliance Automotive Ltd., established a collection and recycling network for high-voltage storage (HVS) systems in 2022. BMW also discloses that “Work began on implementing a network of this kind in the European Union in the reporting year.” (2024 Group Report, p. 145) The objective of these initiatives is to “reintroduce the collected HVS materials as secondary material for the production of new HVS cells, thereby fostering a closed-loop system” (p. 145) However, it is unclear if the network in EU is already operational or still under preparation. As a result, it only gets points for the first and not the last sub-indicator.</p> <p>The company does not provide quantitative or qualitative information about these battery recycling efforts.</p> <p>2024 Group Report https://www.bmwgroup.com/en/report/2024/downloads/BMW-Group-Report-2024-en.pdf</p>	0.25
5. Climate Lobbying		Performance Band (A+ to F) is a full measures of a company's climate policy engagement, accounting for both its own engagement and that of its industry associations.	Multiplier of total category score	A=1.3 B=1.2 C=1.1 N/D = 1 D=0.9 E= 0.8 F=0.7	C- Performance Band https://lobbymap.org/company/BMW-Group	1.1

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
1. Responsible Sourcing: General HR indicators	1.1. Commit	1.1.1. The company has a public commitment to human rights.	1	100%: the company has a standalone human rights policy or other formal commitment that it will respect the Universal Declaration of Human Rights and the International Bill of Rights, or commit to the UN Guiding Principles on Business and Human Rights (UNGPs) and/or the OECD Guidelines for Multinational Enterprises.	<p>BMW has a Human Rights Policy entitled “Policy Statement on Respect for Human Rights and Corresponding Environmental Standards”. This includes a commitment to comply with the International Bill of Human Rights, consisting of the United Nations Universal Declaration of Human Rights, as well as the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social, and Cultural Rights, and to the UN Guiding Principles on Business and Human Rights (p. 7).</p> <p>Policy Statement on Respect for Human Rights and Corresponding Environmental Standards https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/company/downloads/en/2025/BMW_Group_Compliance_Menschenrechte_Grundsatz_EN.pdf</p>	1
		1.1.2. The company extends their human rights commitments to their Tier 1 suppliers and beyond.	2	<p>50%: the company has a Supplier Code of Conduct (SCoC) or equivalent. The SCoC explicitly references the company’s human rights policy or states that suppliers are required to respect and/or uphold all human rights.</p> <p>OR</p> <p>25%: the company has a Supplier Code of Conduct (SCoC) or equivalent that explicitly requires suppliers to comply with the company’s human rights policy that is limited in scope, or to respect a limited selection of human rights listed by the company.</p> <p>PLUS</p> <p>50%: the company "requires" or otherwise mandates their suppliers to apply the requirements of the SCoC to their own suppliers.</p> <p>OR</p> <p>25%: the company "expects" or "encourages" their suppliers to apply these standards to their own suppliers.</p>	<p>The company has a Group Supplier Code of Conduct (GSCoC) which explicitly references the company’s “Policy Statement on Respect for Human Rights and corresponding Environmental Standards” (p. 3). Suppliers are required to comply with these standards: “Compliance with the minimum requirements outlined in these standards is a binding part of the BMW Group terms and conditions of purchase” (p. 3). The company “expect that the supplier has established or is implementing a due diligence process with appropriate measures to ensure that its suppliers and subcontractors, in turn, also comply with the standards and rules set out in this document.”. “The supplier shall pass on sustainability requirements in accordance with this Supplier Code of Conduct to its suppliers” (p. 14).</p> <p>Group Supplier Code of Conduct (GSCoC) https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2022/BMW-Group-Supplier-Code-of-Conduct-V.3.0_englisch_20221206.pdf</p>	2

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
	1.2. Identify	1.2.1. The company has a process in place to assess salient human rights risks in their supply chain.	1	<p>25%: the company states that there is a process in place for identifying salient human rights risks.</p> <p>25%: the company explains its methodology for identifying risks (e.g. desktop review) and prioritising them.</p> <p>25%: the company specifies how often they repeat this risk assessment.</p> <p>25%: the company specifies if and how they engage with external human rights experts. Note: this engagement must be specific to the company and its supply chains to be scored here. Simply participating in a multistakeholder initiative that includes human rights experts is not sufficient, unless the company has articulated how it applies the information gained via these initiatives to their own supply chain.</p> <p>Finally, effective risk identification involves consultation with potentially impacted stakeholders. We have included additional indicators under each section below to reflect this.</p>	<p>BMW describes its human rights risk assessment process, including its salient risk prioritisation process, in its Policy Statement on Respect for Human Rights (p. 20-21). This is done annually or on an ad hoc basis: “a change in business activities or substantiated knowledge from relevant reports may require an immediate update to the risk assessment” (p. 20).</p> <p>In addition: “We conduct risk analyses regularly for our direct suppliers and on an ad hoc basis for our indirect suppliers” (GSCoC, p. 5).</p> <p>The company describes the methodology for identifying risks, which includes systematic data collection and analysis, reaching out to external stakeholders, gathering data from complaints mechanisms, questionnaires, audits, etc (Policy Statement on Respect for Human Rights, p. 20-21). More detail is provided in the company’s Annual Report (AR, p. 97).</p> <p>BMW describes the actions taken to consult external experts: “... the BMW Group involves affected stakeholders and users of sustainability statements in assessing the material sustainability topics. The following stakeholder groups were consulted in order to draw opinions from as wide a circle as possible: investors, the Works Council of BMW AG as employee representatives, customers, suppliers and other business partners, network partners, representatives from civil society, NGOs, and representatives from politics and science. Stakeholders are placed in E, S or G groups based on their expertise, and asked for their individual opinion of the assessment results. Opinions are gathered using structured interview formats, e.g. virtual stakeholder forums with external moderators.” (AR, p. 98).</p> <p>Policy Statement on Respect for Human Rights and Corresponding Environmental Standards https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/company/downloads/en/2025/BMW_Group_Compliance_Menschenrechte_Grundsatz_EN.pdf BMW Group Report 2024 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-Report-2024-en.pdf</p>	1

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
		1.2.2. The company discloses the salient human rights risks in their supply chain and where they are located.	1	<p>The following scores are absolute not cumulative:</p> <p>25%: the company names the generic, salient risks in their supply chain (e.g. conflict minerals, forced labour, water security, etc.).</p> <p>50%: the company discloses where in their supply chain these risks occur, by reference to geographical location, material type, and/or tier. Note: greater level of specificity on all these elements is expected under indicator 2.2.2 on transition minerals risks.</p> <p>100%: the company provides additional description of these risks. Note: to score here, the description must be based on findings from the company's due diligence measures, and not constitute a generic description.</p>	<p>BMW names the generic, salient risks to human rights in their supply chain in the company's AR (p. 175, 231-2). These appear to focus on risks to labour rights only. In relation to these risks, the company also specifies relevant tiers and provides some additional description (e.g. the nature and possible effects of these risks).</p> <p>BMW's Responsible Raw Material Management report also lists key human rights risks per specific raw material, and indicates the relevant tier (i.e. they all occur at mining level), and some of the countries of origin for some of the raw materials (p. 3-21). However, no additional description concerning these risks is provided.</p> <p>Note: the company only provides additional description of the risks to workers' rights listed in the AR. This is too limited to grant points under the last sub-indicator, especially considering the significance of the risks to other rightsholders listed in the company's Responsible Raw Material Management report, and the company's own acknowledgment of the existence of risks to human rights associated with security personnel (typically affecting local communities) as well as the rights of local communities and Indigenous Peoples in its Policy Statement on Respect for Human Rights. For this reason, points are not granted for the last sub-indicator.</p> <p>BMW Group Report 2024 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2025/Rohstoffmanagement_EN.pdf Policy Statement on Respect for Human Rights and Corresponding Environmental Standards https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/company/downloads/en/2025/BMW-Group-Compliance-Menschenrechte-Grundsatz_EN.pdf</p>	0.5

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
		1.2.3. The company has a process for identifying high risk supplier categories in their supply chain.	1	<p>50%: the company outlines the process for how they identify high risk supplier categories in Tier 1 in order to prioritise differential preventive/mitigating action. This may include taking into account the leverage that the automotive company has to affect change (e.g. their annual spend, whether they are a primary or majority buyer, etc.), the geography of suppliers, and the severity of the risks that have been identified.</p> <p>25%: the company outlines how this process extends beyond tier 1. Note: this does not necessarily have to involve a process that extends to the point of extraction, as this is covered below in the transition minerals section.</p> <p>25%: the company outlines the types of preventive/mitigating actions it uses to manage those risks. Note: to score here, it must do more than indicate that there are differential assurance actions, it must specify what those are.</p>	<p>BMW outlines the process for how they identify “supplier locations and product groups at particularly high risk of being linked to possible human rights violations” in its Group Code on Human Rights and Working Conditions (p. 16). These include “a risk filter, a media screening, a sustainability self-assessment questionnaire for the automotive industry, and on-site assessments carried out either by the BMW Group or external third parties.”.</p> <p>Further detail is provided in the Policy Statement on Respect for Human Rights, including the additional measure to confirm risks, such as human rights impact assessments. In relation to indirect suppliers, the company notes: “Above a defined risk threshold, we use questionnaires... for our direct suppliers and, on an ad-hoc basis, for our indirect suppliers (p. 22).</p> <p>The company also outlines the different preventive and remedial measures it might adopt based on these assessment (such as training, ad-hoc risk assessments, etc), including beyond Tier 1 (p. 22-24).</p> <p>BMW’s AR also details the company’s risk assessment process for Tier 1 and beyond (p. 177-178). It states that “the extent of the preventive measures is based on the potential risks, the nature and scope of the business activity and the size of the supplier. These measures are queried, validated and evaluated as part of the procurement process using the Drive Sustainability online assessment” (p. 178).</p> <p>Additional control mechanisms are put in place for “suppliers in high-risk regions or high-risk commodities”. For these situations, the company uses on-site assessments of environmental and social standards at supplier locations using industry-wide or cross-industry assessment programmes, such as the Validated Audit Programme (VAP) provided by the RBA and the Responsible Supply Chain Initiative (RSCI) (p. 178).</p> <p>Group Code on Human Rights and Working Conditions https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/company/downloads/en/2025/BMW_Group_Compliance_HumanRights_Code_EN.pdf Policy Statement on Respect for Human Rights and Corresponding Environmental Standards https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/company/downloads/en/2025/BMW_Group_Compliance_Menschenrechte_Grundsatz_EN.pdf BMW Group Report 2024 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-Report-2024-en.pdf</p>	1

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
	1.3. Prevent, Mitigate and Account	1.3.1. The company assesses the risk of adverse human rights impacts with suppliers prior to entering into any contracts.	2	<p>25%: the company outlines the process to assess risks at individual suppliers. This may include supplier questionnaires, audits, etc. Note: it is not enough for companies to state that they assess suppliers prior to entering into any contracts, they must outline how this assessment occurs. Secondly, a requirement that suppliers sign a statement confirming their compliance is not sufficient risk assessment. Similarly, companies must outline how they verify information provided in supplier self-assessment questionnaires.</p> <p>25%: the company provides quantitative information of the number of potential new suppliers assessed, and the tier that they belong to.</p> <p>25%: the company provides quantitative information on the number of potential new suppliers where non-conformances were found. Note: the action taken to respond to these findings is addressed by indicators below.</p> <p>25%: this process extends beyond tier 1 to tier 2 at a minimum.</p>	<p>BMW explains that “Standardised procedures are embedded in the procurement process. These include the industry-wide sustainability questionnaire developed by the Drive Sustainability initiative (online assessment) and risk-based audits at supplier locations (onsite assessments) in accordance with the standards of the Responsible Business Alliance (RBA) and the Responsible Supply Chain Initiative (RSCI). These procedures enable that expectations regarding human rights and the environment are considered when direct suppliers are selected” (AR, p. 178).</p> <p>Further detail is provided in both the Policy Statement on Respect for Human Rights (p. 22-24) and the Group Code on Human Rights and Working Conditions (p. 16). Information provided in supplier self-assessment questionnaires is “checked for accuracy and completeness by an independent organization; in other cases, the information is reviewed by the BMW Group’s internal departments.” (Policy Statement on Respect for Human Rights, p. 22). The company’s GSCoC also specifies that the company “may request further suitable certificates as supplier verification” (p. 16).</p> <p>BMW discloses that, “in the reporting year, 12,078 supplier sites were assessed using the online assessment”, and that “a total of 132 active and potential supplier sites” were inspected (AR, p. 178). However, the company does not state how many of these assessments and inspections concerned potential new suppliers. The company does not report on identified non-conformances either. The company provides information about the percentage of new suppliers with fully implemented or ongoing corrective action plans at the time of awarding contracts (AR, p. 178). However, this does not indicate the total number of non-conformances found against all potential new suppliers assessed, but only in relation to suppliers whose contracts went ahead.</p> <p>Last year, BMW provided some explanation regarding supplier risk assessment beyond tier 1, and this will be taken into account for purposes of scoring this year. This year’s report adds that depending on the level of the potential risk, preventive or remedial measures required of direct suppliers as part of the procurement process might extend beyond tier 1 (AR, p. 178).</p> <p>Policy Statement on Respect for Human Rights and Corresponding Environmental Standards https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/company/downloads/en/2025/BMW_Group_Compliance_Menschenrechte_Grundsatz_EN.pdf Group Code on Human Rights and Working Conditions https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/company/downloads/en/2025/BMW_Group_Compliance_HumanRights_Code_EN.pdf BMW Group Report 2024 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-Report-2024-en.pdf</p>	1

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
		1.3.2. The company discloses how it monitors suppliers for compliance with the SCoC during the contract period.	2	<p>20%: the company indicates that there is a process in place to monitor compliance.</p> <p>20%: the company provides details on the process (e.g. tools, technologies and sources of information they use).</p> <p>20%: the company provides quantitative information on the number of suppliers assessed for compliance and the tiers that are assessed. Note: this indicator refers to quantitative assessment tools (e.g. surveys).</p> <p>20%: the company provides quantitative information of the number of suppliers audited and the tiers that are audited. Note: this indicator refers to on-site audits.</p> <p>20%: the company provides quantitative information on non-conformances found, their type and severity. Note: it is insufficient just to provide a number, additional information (for example, on the type, location, and/or severity of the non-conformances) must also be provided.</p> <p>OR</p> <p>10%: the company provides quantitative information on non-conformances found</p> <p>Note: Quantitative information on assessments and audits can be provided as a percentage of suppliers assessed / audited or as a number. If the company provides a number of suppliers assessed / audited, they must also provide the total number of suppliers (this can refer to the company as a whole, or to the total number of suppliers within a relevant category). The action taken to respond to these findings is addressed by indicators below.</p> <p>For due diligence to be effective, it must involve potentially impacted stakeholders and/or their representatives. This is scored under each of the sections listed below.</p>	<p>BMW states that they “monitor implementation of our due diligence on an ongoing basis” (Policy Statement on Respect for Human Rights Policy, p. 14) and that it “has established a multi-stage due diligence process to monitor its supply chain” (Group Code on Human Rights and Working Conditions, p. 14).</p> <p>The company’s GSCoC explains: “Upon request, the supplier shall fully and truthfully answer questions from the BMW Group about compliance with its obligations under this Standard, including its actions, any violations, and grievances. ... In order to review suppliers’ compliance with the standards set out in this document, we use, for example, standardized self-assessment questionnaires with requirements relating to nomination, as well as third-party audits in accordance with the audit program of the Responsible Business Alliance (RBA) and the Responsible Supply Chain Initiative (RSCI), and on-site inspections by sustainability experts of the BMW Group. To detect violations, the company also has permanent “Reporting Channels” (p. 16).</p> <p>The company provides additional detail in the AR, “The online and on-site assessments are also used to establish if the supplier is complying with the standards set out in the BMW Group Supplier Code of Conduct” (AR, p. 178).</p> <p>BMW discloses that, “in the reporting year, 12,078 supplier sites were assessed using the online assessment” and that a total of 132 active and potential supplier sites were inspected (AR, p. 178). However, the company does not specify the tier. In addition, the company does not indicate what percentage of total suppliers these numbers represent, and does not disclose the total number of suppliers, as requested in the explanation at the bottom of this indicator.</p> <p><u>Policy Statement on Respect for Human Rights and Corresponding Environmental Standards</u> https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/company/downloads/en/2025/BMW_Group_Compliance_Menschenrechte_Grundsatz_EN.pdf <u>Group Code on Human Rights and Working Conditions</u> https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/company/downloads/en/2025/BMW_Group_Compliance_HumanRights_Code_EN.pdf <u>Group Supplier Code of Conduct (GSCoC)</u> https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2022/BMW-Group-Supplier-Code-of-Conduct-V.3.0_englisch_20221206.pdf <u>BMW Group Report 2024</u> https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-Report-2024-en.pdf</p>	0.8

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
		1.3.3. The company reports on how it is prepared to respond if it finds non-conformances with the SCoC	1.5	<p>This indicator relates to the contractual relationship, or potential contractual relationship, between suppliers and the auto-manufacturer. It applies to all tiers to the point of extraction where there is, or there might be, a direct relationship between the auto manufacturer and the supplier.</p> <p>33%: the company discloses the actions it will take in response to findings of non-conformance by potential new suppliers (for example, time-bound action plans before contracts go ahead, policy revision, targeted training, onsite audits, refraining from contracting, etc.).</p> <p>33%: the company discloses specific actions it will take in response to findings of non-conformance by existing suppliers.</p> <p>33%: the company discloses the number of corrective action plans or equivalent issued during the reporting year. Note: this is distinct from providing remedy to impacted stakeholders.</p> <p>Note: this is distinct from providing remedy to impacted stakeholders.</p>	<p>BMW explains that if any deviations are found when considering new suppliers, preventive measures are requested. “Prospective suppliers of production-related goods and services are required to successfully implement these measures up to the start of production”.</p> <p>Measures to “implement, expand or continue to implement the necessary preventive or remedial measures” may continue after signing a contract, “within a specified period” (AR, p. 178).</p> <p>In case of findings of non-conformance by existing suppliers, the company discloses that, “an escalation process is initiated, and corrective action plans are developed in conjunction with the supplier. Where a supplier fails to take effective corrective action, the BMW Group may potentially terminate the supply contract.” (Group Code, p. 16).</p> <p>Further response measures are described in the company’s Policy Statement on Respect for Human Rights: “on-site Human Rights Impact Assessments”, and “ad-hoc risk assessment” (p. 23, 25). “Depending on the extent of the violation, we reserve the right to require our business partners to rectify the situation immediately, take legal action, temporarily suspend the business relationship, or, as a last resort, terminate it” (p. 25).</p> <p>The company does not disclose the number of corrective action plans or equivalent measures issued during the reporting year. While the company discloses the proportion of new suppliers with implemented or ongoing corrective action, this does not cover all existing suppliers, and therefore points are not awarded.</p> <p>BMW Group Report 2024 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-Report-2024-en.pdf Group Code on Human Rights and Working Conditions https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/company/downloads/en/2025/BMW_Group_Compliance_HumanRights_Code_EN.pdf Policy Statement on Respect for Human Rights and Corresponding Environmental Standards https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/company/downloads/en/2025/BMW_Group_Compliance_Menschenrechte_Grundsatz_EN.pdf</p>	1

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
		1.3.5. The company discloses how they verify the implementation of corrective actions.	1	<p>The following scores are absolute, not cumulative:</p> <p>100%: the company discloses the types of actions that it undertakes across its whole supply chain to verify whether corrective actions have occurred.</p> <p>25%: the company only a subset of the types of actions that it undertakes to verify whether correction actions have occurred (e.g. audits) and/or only discloses the types of actions that it undertakes for certain supply chains and/or materials to verify whether corrective actions have occurred.</p> <p>Note: successful corrective measures involve impacted stakeholders and/or their representatives. Their involvement is scored under each section below.</p>	<p>BMW explains that the implementation of remedial action plans is monitored in cooperation with the RBA and the RSCI. If the non-conformances had been categorised as severe, “the effectiveness of the agreed measures is verified in an on-site closure assessment” (AR, p. 179).</p> <p>BMW Group Report 2024 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-Report-2024-en.pdf</p>	1
	1.4. Remedy	1.4.1. The company has put in place a formal mechanism whereby workers, suppliers, suppliers' workers (in any tier) and other external stakeholders can raise grievances regarding adverse human rights impacts in their supply chain to an impartial entity.	2	<p>10%: if the company only has an in-house mechanism</p> <p>20%: the company has put in place an independent, formal mechanism to report a grievance to an impartial entity regarding human rights in the company's supply chains.</p> <p>20%: The mechanism is available to its workers, suppliers, suppliers' workers (in any tier) and other external stakeholders (e.g. whistleblower hotline).</p> <p>50%: the company communicates how the existence of the mechanism is communicated to its suppliers' workers and other impacted stakeholders. Note: simply posting it on the website is not enough.</p> <p>The involvement of impacted stakeholders and their legitimate representatives (e.g. workers, indigenous communities, etc.) in the design, review, operation and ongoing improvement of grievance mechanisms is central to their efficacy. As such, additional indicators have been included under each focus area regarding the specific integration of feedback from different stakeholder groups.</p>	<p>The company has put in place the BMW Group Compliance Contact, the BMW Group SpeakUP Line, the Human Rights Contact Supply Chain, and an Ombudsperson (Policy Statement on Respect for Human Rights, p. 27). All employees and external parties can raise their compliance concerns to the SpeakUp Line and the Ombudsperson, and these concerns can relate to the company's own activities or the supply chain. The Ombudsperson is a “neutral external person bound by attorney-client privilege” (Rules for Procedure for Informants, p. 2).</p> <p>The company does not explain how it communicates the existence of these mechanisms to its suppliers' workers and other impacted stakeholders. In its Annual Report, BMW states that “information on the reporting channels available can be found on the BMW Group website and elsewhere” (AR, p. 179). As noted under the last sub-indicator, this information is not enough to achieve points.</p> <p>Policy Statement on Respect for Human Rights and Corresponding Environmental Standards https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/company/downloads/en/2025/BMW_Group_Compliance_Menschenrechte_Grundsatz_EN.pdf</p> <p>Rules of Procedure for Informants https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/Menschenrechte/BMW_Group_Rules%20of%20procedure_LkSG_EN.pdf</p> <p>BMW Group Report 2024 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-Report-2024-en.pdf</p>	1

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
		1.4.3. The company discloses data about the practical operation of their grievance mechanism, such as the number of grievances filed, addressed, and resolved, their type, severity and outcome.	1	<p>25%: The company provides quantitative information about the total number of grievances raised during the reporting year.</p> <p>25%: The company provides quantitative information about the total number of supply chain grievances, with detail as to their type, severity, tier, and geographical location.</p> <p>25%: the company provides information about the number of supply chain grievances resolved, and an indication of how they were resolved. Note: simply stating that the grievance was resolved is not enough - the company must disclose the substantive outcome (e.g. rejected and reasons for rejection, confirmed and compensation provided, and/or agreement with the complainant reached, and/or rectification of wrongful practices requested, etc.). The indicator below seeks greater detail as to the concrete measures of reparation offered.</p> <p>25%: The company provides information about the total number of ongoing supply chain grievances.</p>	<p>BMW discloses that, “in the reporting year, 22 notifications of potential violations of the sustainability principles in the supply chain were received through the reporting channels” (AR, p. 179).</p> <p>The company does not disclose details as to type, severity, tier, or geographical location. However, the company does provide information about their outcome. Of the 22 notifications, 16 were resolved as unjustified. The remaining 6 were still being processed.</p> <p>The company also refers to 6 notifications from previous years. Of these, 3 were resolved as unjustified, and 3 were still being processed (p. 179). This suggests that, at the close of the reporting year, there were a total of 9 ongoing supply chain notifications which hadn’t been resolved.</p> <p>BMW Group Report 2024 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-Report-2024-en.pdf</p>	0.75

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Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
		1.4.4. The company has put in place a remedy process for its supply chain.	2	<p>25%: the company describes how they investigate an issue that is raised and escalate the issue within the company</p> <p>25%: the company indicates how they determine appropriate remedy</p> <p>25%: the company indicates whether the affected rightsholders are involved in the determination of remedy and how</p> <p>25%: the company discloses information about the number of confirmed human rights grievances in its supply chain that resulted in measures of reparation to those affected</p> <p>Note: the UNGPs specify that impacted stakeholders should be involved in the determination of remedy. As such, additional indicators have been included under each of the focus areas to provide a score regarding the company's engagement with specific stakeholder groups.</p>	<p>The company's Rules of Procedure for Informants explains the process once a complaint has been submitted, including how the issue raised is investigated. This includes how the Complaints Office verifies or gathers additional information and seeks to clarify the facts. If the allegation is confirmed, a "solution" is determined by the relevant department. Information about participation of rightsholders in the determination of remedy is insufficient. The Rules of Procedure specify that, wherever possible, the complainant will be involved in finding a solution, but this is too limited and does not describe what this involvement might look like.</p> <p>BMW states that "if violations have already occurred, we conduct on-site Human Rights Impact Assessments. These are aimed at providing a better understanding of the structural causes of the violations, so we can remediate them effectively." (Policy Statement on Respect for Human Rights, p. 23). Later in the Statement, the company states that they respond by "conducting an ad-hoc risk assessment" (p. 25). If violations are confirmed or are imminent, the company takes "remedial action without undue delay to prevent, end, or minimize the violation", or to "prevent, mitigate, or remediate the possible violation" (p. 25).</p> <p>BMW does not disclose information about the number of confirmed human rights grievances in its supply chain that resulted in measures of reparation to those affected. However, as described under 1.4.3 above, the company states that no notification of supply chain grievances has yet resulted in a confirmed grievance, and it is therefore presumed that no specific reparations to complainants have had to be offered.</p> <p>Rules of Procedure for Informants https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/Menschenrechte/BMW_Group_Rules%20of%20procedure_LkSG_EN.pdf</p> <p>Policy Statement on Respect for Human Rights and Corresponding Environmental Standards https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/company/downloads/en/2025/BMW_Group_Compliance_Menschenrechte_Grundsatz_EN.pdf</p> <p>BMW Group Report 2024 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-Report-2024-en.pdf</p>	1.5

Company analysis - human rights & responsible sourcing						
Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
2. Responsible Sourcing of Transition Minerals	2.1. Commit	2.1.1. The company has a commitment to responsible metals and minerals sourcing.	1	<p>The following scores are not cumulative, they are absolute:</p> <p>100%: the company has a standalone responsible minerals sourcing policy or their human rights policy includes a section on the responsible sourcing of minerals and metals that applies to all minerals and metals.</p> <p>75%: the company has a standalone responsible minerals sourcing policy or their human rights policy includes a section on the responsible sourcing of minerals and metals that goes beyond "conflict minerals" to include some other minerals or metals (e.g. includes cobalt).</p> <p>50%: the company has a standalone responsible minerals sourcing policy or their human rights policy includes a commitment to the responsible sourcing of "conflict minerals" only.</p>	<p>BMW does not have a standalone responsible minerals sourcing policy, but the company includes specific commitments in its Policy Statement on Respect for Human Rights (p. 13): "We adopt a risk-based approach to handling raw materials with the aim of avoiding negative impact on human rights and environment-related standards. In our risk analysis, we take into account that some of the raw materials used to manufacture our products may be hazardous to people and the environment during procurement and processing and require special measures.". The policy also states: "We take a long-term, holistic view that begins with respect for human rights and sustainable extraction of raw materials throughout our far-reaching supplier network and extends all the way into our sales networks" (p. 3).</p> <p>Policy Statement on Respect for Human Rights and Corresponding Environmental Standards https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/company/downloads/en/2025/BMW_Group_Compliance_Menschenrechte_Grundsatz_EN.pdf</p>	1
		2.1.2. The company requires its suppliers to undertake due diligence in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas (CAHRAs)	2	<p>50%: Implementation of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs:</p> <ul style="list-style-type: none"> - 50%: the SCoC requires suppliers to undertake due diligence in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs in relation to all salient metals and minerals from anywhere. <p>OR</p> <ul style="list-style-type: none"> - 25%: the SCoC requires suppliers to undertake due diligence in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs in relation to all metals and minerals from CAHRAs. <p>OR</p> <ul style="list-style-type: none"> - 10%: the SCoC requires suppliers to undertake due diligence in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs in relation to tin, tungsten, tantalum, and gold (3TGs) from CAHRAs. <p>50%: Implementation of Due Diligence:</p> <ul style="list-style-type: none"> - 25%: the company requires suppliers to have a due diligence process in place to identify raw materials sources, specifically, conducting due diligence on Smelter or Refiners (SoRs) in their supply chain (this may include the use of third party certification, etc). - 25%: the company requires suppliers to disclose smelter/refiner information. 	<p>BMW's GSCoC requires suppliers of raw materials to establish special due diligence processes in accordance with the 'OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas' for tin, tungsten, tantalum, and gold (conflict minerals) from conflict-affected and high-risk areas (p. 12-13).</p> <p>Suppliers must extend due diligence processes to a list of additional metals and minerals (aluminium, graphite, cobalt, lithium, mica, etc.), but are not expressly required to do this in line with the OECD Guidance (p. 13).</p> <p>The GSCoC also indicates that smelters and refiners without an adequate, audited due diligence processes in place must be excluded. Upon request, suppliers must disclose their raw materials supply chain, including information on the origin of the material, e.g. via the 'Responsible Minerals Assurance Process' (RMAP) by the RMI. Raw materials should be obtained from audited sources, using independent, third-party assurance, such as the Standard for Responsible Mining from the 'Initiative for Responsible Mining Assurance' (IRMA)." (p. 13).</p> <p>The company does not state whether it requires suppliers to disclose smelter/refiner information specifically. While the above paragraphs suggest that this information might be required as part of the broader requirement to disclose raw materials supply chains, and specific requirements to work with adequately audited SoR, this is not expressly articulated. While points for the last sub-indicator will continue to be given this year, we will expect greater clarity going forward to continue to award points.</p> <p>Group Supplier Code of Conduct (GSCoC) https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2022/BMW-Group-Supplier-Code-of-Conduct-V.3.0_englisch_20221206.pdf</p>	1.2

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
	2.2. Identify	2.2.1. The company has a process in place to map transition minerals (e.g. nickel, lithium, cobalt, copper, manganese, zinc) in their supply chains to the point of extraction.	2	<p>25%: the company discloses that they have a process in place to map transition minerals supply chains back to the point of extraction.</p> <p>25%: the company provides detail on the processes that they have put in place to map their transition minerals supply chains to the point of extraction.</p> <p>25%: the company discloses the portion of the transition minerals supply chain that they have mapped to the point of extraction. Note: this could be by specifying which supply chains they have mapped, a percentage of total suppliers mapped, etc.</p> <p>25%: the company discloses concrete information from their mapping including, at minimum, primary countries of origin</p> <p>MODIFIER: In order to achieve full credit the mapping must cover at least the three focus minerals that are of significant industry and stakeholder focus given outsized volume and/or impacts: cobalt, nickel & lithium. Companies that map two of fewer minerals will receive half scores.</p>	<p>BMW states that “supply chain mapping forms the basis for analysing risks at indirect suppliers. Therefore, the Company works continuously to increase transparency throughout its supply chain, making use of external databases, among other things”. For conflict minerals, BMW uses RMI tools to trace raw materials back to smelters (AR, p. 180).</p> <p>The AR provides a link to a webpage containing additional information on specific raw materials. According to this, the company is working with suppliers of lithium, nickel, mica, and cobalt to establish traceability systems. The company has contributed to the development of the Catena-X digital ecosystem as a tool for data exchange across the value chain “and is in the process of gradually integrating its partners in the supply chain” (AR, p. 63). “It is important for the BMW Group to be able to trace components along international, multi-level supply chains. Another key advancement is the provision of digital product passports, which will be required for many products in future. They contain product-specific data for components such as batteries, steel, aluminium and wheels. Catena-X makes data from sub-supplier chains available, especially regarding origin, material composition and recycling” (AR, p. 65).</p> <p>This webpage referred to above also provides raw material-specific information relating to countries of origin. It is not always clear whether these are generic statements relating to where these raw materials tend to come from, or statements about the confirmed countries of origin of BMW’s raw materials. Based on the way the information is laid out, it is only possible to confirm that at least some of BMW’s copper comes from Peru, cobalt from the DRC, mica from India, and bauxite from Guinea.</p> <p>BMW Group Report 2024 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-Report-2024-en.pdf Responsible Raw Material Management (website) https://www.bmwgroup.com/en/sustainability/responsible-raw-material-management.html#carousel-35691fdd3c-item-5090c76bb8-tabpanel</p>	1.5

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
		2.2.2. The company discloses conflict minerals risks in their supply chain and where they are located.	1	<p>Note: Conflict minerals refers to tin, tungsten, tantalum and gold or "3TG".</p> <p>25%: the company discloses the risks of sourcing conflict minerals from CAHRAs in their supply chains, specifying the minerals and countries of origin potentially involved.</p> <p>25%: the company discloses whether they source conflict minerals from CAHRAs, as well as the relevant transition minerals and countries of origin involved.</p> <p>50%: the company describes the human rights risks associated with the CAHRA countries they source conflict minerals from in some level of detail. Note: to score here, the description must be based on findings from the company's due diligence measures, and not constitute a generic description.</p>	<p><u>BMW recognises the risk that tin, tungsten, tantalum and gold from CAHRAs, including the DRC, " could find their way into our products via the supply chain" (BMW Group Conflict Minerals Policy).</u></p> <p><u>The company also discusses this risk in its Responsible Raw Material Management Report (p. 14). However, the company does not confirm whether the conflict minerals in their products do indeed come from CAHRAs.</u></p> <p><u>The company's "Responsible Raw Material Management" webpage contains information about 3TG, stating that they are "primarily extracted in the Democratic Republic of Congo (DRC) and neighbouring regions and in the conflict-affected and high-risk areas (CAHRAs)". However, this is a generic description and the company does not state whether the 3TG in its products come from any of these countries. Last year, the company did confirm that their products contained 3TG at least from the DRC, and got points for this sub-indicator. Because the last sub-indicator rests on the company having confirmed that they source 3TG from at least one CAHRA country, points cannot be given for this sub-indicator either. Again, last year the company got points for this sub-indicator for providing some description about the human rights risks associated with sourcing from the DRC.</u></p> <p><u>BMW Group Conflict Minerals Policy</u> https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/new_umwelt-und-sozialstandards/CM-Policy_EN.pdf <u>Responsible Raw Material Management at the BMW Group</u> https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2025/Rohstoffmanagement_EN.pdf</p>	0.25

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
		2.2.3. The company discloses broader transition minerals risks in their supply chain and where they are located.	1	<p>The following scores are absolute and not cumulative:</p> <p>100%: the company discloses broader risks from transition minerals in their supply chains and where these are located, by reference to tier, and geographical location for lithium, nickel, cobalt and at least one other mineral.</p> <p>50%: the company discloses broader risks from transition minerals in their supply chains and where these are located, by reference to tier and geographical location for lithium, nickel and cobalt.</p> <p>25%: the company discloses broader risks from sourcing at least one transition mineral, with reference to tier and geographical location and/or the company discloses human rights risks of sourcing transition minerals in general, including countries of origin, without disaggregating this information for individual minerals</p>	<p>BMW's Annual Report does not disclose human rights risks associated with specific transition minerals in their supply chains. However, the company's Responsible Raw Material Management report does disclose risks associated with specific transition and other minerals in their supply chain, with some reference about where in the supply chain these are located.</p> <p>While the company mentions the relevant tier (all the listed risks occur at mine site level), it does not always indicate the country of origin, or it only indicates the country of origin where the relevant minerals mostly come from, but not necessarily where the minerals in its own supply chain come from.</p> <p>As far as lithium, nickel, and cobalt are concerned, it is only possible to confirm that the company sources at least some of its cobalt from the DRC (p. 4), and some of its lithium from Chile (p. 11). In relation to nickel, the company only refers to the countries where this mineral mostly comes from, and not necessarily where the nickel in its own supply chain comes from.</p> <p>Note: even in relation to cobalt and lithium, the country of origin information only emerges implicitly from the description of specific MSI projects the company is involved in, and is not the result of a deliberate disclosure practice.</p> <p>BMW Group Report 2024 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-Report-2024-en.pdf Responsible Raw Material Management at the BMW Group https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2025/Rohstoffmanagement_EN.pdf</p>	0.25
		2.2.4. The company publishes a list of smelters or refiners (SoR) in its supply chain	1	<p>100%: the company publishes a complete list of smelters/refiners in their supply chain for at least 3TG minerals.</p> <p>50%: the company publishes a partial list of smelters/refiners in their supply chain. Note: to score here, the company must disclose a significant number of SoRs.</p>	Not disclosed	0

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
		2.2.5. The company discloses which of the SoRs in its supply chain are conformant with the Responsible Minerals Initiative (RMI).	1	<p>100%: the company discloses information on RMI conformance for all of the SoRs identified in their supply chain.</p> <p>50%: the company only discloses information on RMI conformance for some of the SoRs in its supply chain or only discloses information on RMI conformance on an aggregate / percentage basis-</p> <p>Note: 0.4 points modifier applied due to multistakeholder initiative assessment. See sheet 8.</p>	Not disclosed	0
	2.3. Prevent, Mitigate and Account	2.3.1. The company discloses how it monitors suppliers for compliance with the transition minerals due diligence requirements.	2	See general HR indicators	See general HR indicators.	0.8
		2.3.2. The company formally engages SoRs to build their capacity to conduct due diligence of their own supply chains.	2	<p>25%: the company discloses that it participates in industry wide schemes that engage with smelters/refiners on their compliance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs.</p> <p>25%: the company specifies that it engages directly with SoRs to build their capacity to conduct due diligence.</p> <p>50%: the company provides detail on how it engages with SoRs to build their capacity</p>	<p>BMW is a member of the Responsible Minerals Initiative (RMI), which provides third party assessments of SoRs in line with the OECD Guidelines (AR, p. 64).</p> <p>“On an ad hoc basis, we require our suppliers to provide us with information about their supply chain for these materials, as well as other critical raw materials where applicable, including information about the origin of the material, for instance via the Responsible Minerals Assurance Process (RMAP) of the Responsible Minerals Initiative (RMI) (GSCoC, p. 13).</p> <p>BMW does not specify whether they engage with SoRs directly.</p> <p>BMW Group Report 2024 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-Report-2024-en.pdf Group Supplier Code of Conduct (GSCoC) https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2022/BMW-Group-Supplier-Code-of-Conduct-V.3.0_englisch_20221206.pdf</p>	0.5

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
		2.3.3. The company formally engages extractives companies and includes human rights clauses in any contractual arrangements.	2	<p>50%: the company discloses that it has entered into direct agreements with extractives companies for the sourcing of transition minerals and that these companies are subject to human rights requirements</p> <p>50%: the company discloses the name of extractive companies it has entered into direct agreement with, the relevant transition minerals, and the location of the relevant mine or mines. Note: to score here, the company must provide this level of detail for a meaningful number of contracts (one or two is not enough).</p>	<p>BMW states that they “can also secure raw materials such as lithium and cobalt itself directly, where required, in order to increase its security of supply, boost resilience in the supply chain and encourage the purchasing of raw materials from responsible sources” (AR, p. 64). However, the company does not provide details of any actual agreement.</p> <p>Last year, points were given because BMW had reported on the use of human rights clauses the year before, and this was considered to still be valid and relevant. However, this information is now too old to be considered. Last year’s report had also included a link to a webpage containing information on a number of direct sourcing agreements which were considered for awarding points. However, this year’s report does not contain any such references, and the webpage no longer appears to provide this information.</p> <p>BMW Group Report 2024 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-Report-2024-en.pdf</p> <p>Responsible Raw Material Management at the BMW Group https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2025/Rohstoffmanagement_EN.pdf</p> <p>The BMW Group Stakeholder Engagement Policy https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2024/20241022_Stakeholder-Engagement-Policy_EN.pdf</p>	0

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
		<p>2.3.4. The company is a member of IRMA and actively engages their suppliers with regards to IRMA mining audits.</p> <p>Note: IRMA does not excuse companies from doing their own supply chain due diligence</p>	2	<p>25%: The company is a member of IRMA.</p> <p>50%: The company actively engages extractive companies within its supply chain regarding auditing by IRMA.</p> <p>25%: the company has established requirements for minerals / metals within its supply chain to be sourced from IRMA audited mines. Note: such requirements do not need to be effective immediately, but the requirement must at least refer to a pathway towards sourcing from mines that have undergone independent IRMA audits within a period of time. Requirements can apply to extractive companies and/or downstream suppliers (e.g. battery manufacturers).</p> <p>Note: 0.8 points modifier applied due to multistakeholder initiative assessment. See sheet 8.</p>	<p>BMW is a member of IRMA (AR, p. 180), and it engages suppliers regarding certification by IRMA.</p> <p>The company explains that they are “involved in the development and implementation of environmental and social standards in the supply chain, including those at the Initiative for Responsible Mining (IRMA) and the Responsible Minerals Initiative (RMI), and the implementation of the same by suppliers” (AR, p. 64).</p> <p>Last year, the company explained that they were actively encouraging lithium, cobalt, and nickel producers to obtain certification by IRMA. The company appears to only encourage or expect IRMA auditing, i.e. not yet require it: “The supplier should obtain raw materials from audited sources. We expect the supplier to obtain certification by an independent third party, such as the Standard for Responsible Mining from the Initiative for Responsible Mining Assurance (IRMA). The BMW Group is involved in multi-stakeholder initiatives that aim to establish the standards set out in this document in raw material supply chains. We recommend that suppliers also involve themselves actively in this where relevant” (GSCoC, p. 13).</p> <p>BMW Group Report 2024 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-Report-2024-en.pdf Group Supplier Code of Conduct (GSCoC) https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2022/BMW-Group-Supplier-Code-of-Conduct-V.3.0_englisch_20221206.pdf</p>	1.2
		<p>2.3.5. The company reports on how it is prepared to respond if it finds non-conformances associated with its responsible minerals sourcing policy occurring in its operations or supply chains.</p>	1.5	<p>See general HR indicators</p>	<p>See general HR indicators</p>	1

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
		2.3.6. The company discloses how they verify the implementation of corrective actions.	1	See general HR indicators	See general HR indicators.	1
	2.4. Remedy	2.4.1. The company has put in place a formal mechanism whereby grievances can be raised about SoR facilities.	1	<p>50%: the company has put in place an independent, formal grievance mechanism that applies specifically to SoRs. This mechanism may be run in conjunction with other auto manufacturers. Note: this is in addition to any generic grievance mechanism that can be accessed by external stakeholders.</p> <p>50%: the company discloses how they review and investigate grievances raised through this mechanism.</p>	Not disclosed	0
3. Indigenous Peoples' Rights and Free Prior and Informed Consent (FPIC)	3.1. Commit	3.1.1. The company explicitly commits to respecting the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).	1	100%: the company has an explicit commitment to the UNDRIP in their human rights policy and/or in a standalone Indigenous Peoples' rights policy.	<p>The company commits to the ILO Convention 169 in its Policy Statement on Respect for Human Rights (p. 7), but not to the UNDRIP. It does not have a standalone Indigenous Peoples' rights policy.</p> <p>Policy Statement on Respect for Human Rights and Corresponding Environmental Standards https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/company/downloads/en/2025/BMW_Group_Compliance_Menschenrechte_Grundsatz_EN.pdf</p>	0
		3.1.2. The company has a public commitment to FPIC.	1	<p>100%: the company has an explicit commitment to FPIC in their human rights policy and/or in a standalone Indigenous Peoples' rights policy. Note: to score full points, the commitment must be unqualified.</p> <p>50%: the company has an explicit commitment to FPIC in their human rights policy and/or in a standalone Indigenous Peoples' rights policy, but it is qualified (e.g. it allows for only consultation in practice, it is expected only in certain circumstances, it applies only to certain parts of the supply chain, etc.)</p>	The company does not commit explicitly to FPIC in its human rights policy, and it does not have a standalone Indigenous Peoples' rights policy.	0

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
		3.1.3. The company requires its tier 1 suppliers to respect Indigenous Peoples' rights	2	The SCoC, responsible sourcing policy or equivalent explicitly requires suppliers to respect the UNDRIP (50%) and FPIC (50%). MODIFIER: Points will be halved if the policy is qualified.	BMW requires suppliers to respect "the rights of indigenous peoples and local communities ... throughout the supply chain in accordance with the 'UN Declaration on the Rights of Indigenous Peoples'" and to obtain FPIC. FPIC is "as defined by the UN-REDD Programme"(GSCoC, p. 12). Group Supplier Code of Conduct (GSCoC) https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2022/BMW-Group-Supplier-Code-of-Conduct-V.3.0_englisch_20221206.pdf	2
		3.1.5. These commitments are translated into the languages used by the impacted Indigenous Peoples.	1	50%: the company requires suppliers to translate these commitments to the languages of the impacted Indigenous Peoples. 50%: the company requires that these translations are actively made available to the Indigenous Peoples concerned.	Not disclosed	0
3.2. Identify		3.2.1. The company has a process in place to assess risks to Indigenous Peoples' rights in their supply chain to the point of extraction.	1	25%: The company discloses that their supply chain risk identification process explicitly includes FPIC and other Indigenous Peoples' rights issues through to the point of extraction. 25%: the company discloses where in the supply chain these risks occur (e.g. materials, tiers, and geographical location). 25%: the company explains how Indigenous Peoples are involved in the risk identification process. 25%: the company provides case studies of this process in practice. Case studies should include information on the location, supplier/s involved, the potential impacts on Indigenous Peoples' rights, the Indigenous Peoples concerned and their objections or concerns, and the way the company went about or is ensuring that the specific rights in question are respected.	The company does not disclose whether FPIC risks are identified and assessed as part of the supply chain risk identification process. The company does disclose on its website some information about where in specific raw material supply chains these risks occur. However, it is not clear whether this relates to the company's supply chain or is a generic description. This is because, as indicated earlier, the indication of country of origin appears to be a generic description of the place where these materials tend to come from, and not where the raw materials in the company's supply chain concretely come from. Information on Indigenous People's involvement in risk identification and/or concrete examples/case studies are not provided. Responsible Raw Material Management (website) https://www.bmwgroup.com/en/sustainability/responsible-raw-material-management.html#carousel-35691fdd3c-item-5090c76bb8-tabpanel	0

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
	3.3. Prevent, Mitigate and Account	3.3.1. The company provides additional discussion regarding the practices by which suppliers must obtain FPIC	1	<p>100%: the company describes in detail the process that suppliers must follow (for example, guidance put in place by the company for suppliers to follow, or other practical means of operationalising the company's FPIC commitments throughout the supply chain).</p> <p>25%: the company states a minimum expectation for suppliers and/or the process it describes is limited in its application.</p>	Not disclosed	0
		3.3.2. The company is a member of a multi-stakeholder group (e.g. IRMA) that includes the participation of Indigenous Peoples to ensure respect of Indigenous Peoples' rights at the point of extraction.	2	Refer to Responsible Sourcing of Transition Minerals indicators.	Refer to Responsible Sourcing of Transition Minerals indicators.	1.2
		3.3.3. The company has a formal process in place to engage critical upstream suppliers on FPIC (e.g. extractives companies)	2	<p>This score relates to direct engagement by the company with extractives companies. Note: It is in addition to their membership of IRMA, and it applies whether the extractive companies are direct or indirect suppliers.</p> <p>25%: the company formally engages extractive companies regarding FPIC.</p> <p>25%: the company states that they formally review company documents (e.g. meeting minutes) to ensure that Indigenous Peoples' FPIC has been provided.</p> <p>50%: the company engages directly with representatives of Indigenous Peoples affected by mining operations to review that regular engagement and consultation take place, community needs are responded to, and there continues to be FPIC.</p>	<p>Not disclosed. While the company now has a Stakeholder Engagement Policy, this does not provide any information about engagement with Indigenous Peoples to resolve specific issues or for the specific purpose of remedy.</p> <p>The BMW Group Stakeholder Engagement Policy https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2024/20241022_Stakeholder-Engagement-Policy_EN.pdf</p>	0

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
		3.3.4. The company reports on how it is prepared to respond if it finds FPIC breaches in its supply chain.	1	<p>The general HR indicators provide a baseline for this. In addition:</p> <p>25%: the company discloses the action it will take if disagreements or disputes with Indigenous Peoples arise in its supply chain.</p> <p>25%: the company discloses the action it will take if it finds FPIC breaches in its supply chain.</p> <p>50%: the company explains how the Indigenous Peoples affected by FPIC breaches are involved in decisions about how to respond (including, but not limited to, whether the company should suspend or cease its relationship with a supplier).</p>	<p>Not disclosed. While the company now has a Stakeholder Engagement Policy, this does not provide any information about engagement with impacted Indigenous Peoples for purposes of addressing and resolving issues concerning them, including FPIC breaches.</p> <p>The BMW Group Stakeholder Engagement Policy https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2024/20241022_Stakeholder-Engagement-Policy_EN.pdf</p>	0
	3.4. Remedy	3.4.1. The company's grievance mechanism has a process for investigating and remedying breaches of FPIC that includes a formal role for impacted Indigenous Peoples.	1	<p>FPIC is a continuous process – not a single decision at a single moment in time. Grievance mechanisms should be able to address FPIC concerns throughout the lifetime of a project.</p> <p>25%: the company explains how it involves Indigenous Peoples in the design of its grievance mechanisms and/or processes to address their complaints.</p> <p>25%: the company explains how it involves Indigenous Peoples in the investigation of grievances and determination of remedy.</p> <p>50%: the company provides examples or case studies of remedy provided to Indigenous Peoples for confirmed breaches of FPIC in the supply chain.</p>	<p>Not disclosed. While the company now has a Stakeholder Engagement Policy, this does not provide any information about engagement with Indigenous Peoples regarding grievance mechanisms or processes to determine remedy for FPIC breaches.</p> <p>The BMW Group Stakeholder Engagement Policy https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2024/20241022_Stakeholder-Engagement-Policy_EN.pdf</p>	0

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
4. Respect for Workers' Rights	4.1. Commit	4.1.1. The company has a commitment to workers' rights	1	<p>25%: The company's human rights policy (or similar) includes a specific commitment to the ILO Declaration on Fundamental Principles and Rights at Work and/or the ILO Fundamental Conventions.</p> <p>OR</p> <p>50%: The company identifies and commits to respecting each of the five Fundamental Principles and Rights at Work as established in the ILO Declaration (companies who do not make explicit and unqualified commitments to all five ILO principles will not be scored):</p> <ol style="list-style-type: none"> 1. freedom of association and the effective recognition of the right to collective bargaining; 2. the elimination of all forms of forced or compulsory labour; 3. the effective abolition of child labour; 4. the elimination of discrimination in respect of employment and occupation; and 5. a safe and healthy working environment. <p>PLUS</p> <p>25%: the company has a commitment to a living wage in their human rights policy or in another formal policy document.</p> <p>25%: the company outlines how it calculates a living wage.</p>	<p>BMW's Policy Statement on Respect for Human Rights lists the ILO Declaration on Fundamental Principles and Rights at Work, and explicitly mentions the five fundamental principles (p. 7, 8-10). In this policy, the company commits to "fair remuneration", but not to a living wage. Globally, they commit to "the locally applicable, legally guaranteed minimum standards and minimum wages of the respective economic sectors" (p. 10).</p> <p>Policy Statement on Respect for Human Rights and Corresponding Environmental Standards https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/company/downloads/en/2025/BMW_Group_Compliance_Menschenrechte_Grundsatz_EN.pdf</p>	0.5
		4.1.2. The company extends their workers' rights commitments to their Tier 1 suppliers and beyond.	2	<p>25%: The SCoC includes a specific commitment to the ILO Declaration on Fundamental Principles and Rights at work and/or the ILO Fundamental Conventions.</p> <p>OR</p> <p>50%: The SCoC includes specific requirements on each of the five Fundamental Principles and Rights at Work as established in the ILO Declaration (companies whose SCoCs do not include explicit and unqualified requirements on all five ILO principles will not be scored):</p> <ol style="list-style-type: none"> 1. freedom of association and the effective recognition of the right to collective bargaining; 2. the elimination of all forms of forced or compulsory labour; 3. the effective abolition of child labour; 4. the elimination of discrimination in respect of employment and occupation; and 5. a safe and healthy working environment. <p>PLUS</p> <p>25%: the SCoC requires suppliers to pay a living wage.</p> <p>25%: the SCoC prohibits the payment of recruitment fees.</p>	<p>BMW's GSCoC requires suppliers to observe the principles and rights set forth in the ILO Declaration on Fundamental Principles and Rights at Work (p. 8), and explicitly lists all five fundamental principles (p. 9-11). It also includes a requirement to pay a wage "at least in accordance with the locally applicable minimum wage regulations and in any case shall be a living wage" (p. 11). It does not expressly prohibit the payment of recruitment fees.</p> <p>Group Supplier Code of Conduct (GSCoC) https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/responsibility/downloads/en/2022/BMW-Group-Supplier-Code-of-Conduct-V.3.0_englisch_20221206.pdf</p>	1.5

Note: only the specific worker rights commitments are evaluated here. Whether or not these commitments are extended beyond tier 1 suppliers is evaluated in the "General" human rights section.

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
	4.2. Identify	4.2.1. The company consults trade unions and/or workers' representatives in their assessment of salient workers' rights risks in their supply chain.	1	<p>Generic supply chain indicators provide a baseline score for this. To get additional points here, companies must specify that they consult with labour unions and/or workers' representatives regarding salient workers' rights in the supply chain. This must expressly include labour unions and/or workers' representatives in the supply chain and/or global union federations (GUFs)</p> <p>Note: workers' representatives are not a substitute for trade unions where trade unions are allowed to operate and not limited in their activities.</p>	<p>BMW explains that, in assessing the material sustainability topics, the company consulted with "investors, the Works Council of BMW AG as employee representatives, customers, suppliers and other business partners, network partners, representatives from civil society, NGOs, and representatives from politics and science." (AR, p. 98). However, this does not include labour unions and/or workers' representatives in the supply chain, or global union federations.</p> <p>BMW Group Report 2024 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-Report-2024-en.pdf</p>	0
		4.2.2. The company discloses the salient workers rights risks in their supply chain and where they are located.	1	<p>The following scores are absolute not cumulative:</p> <p>100%: the company's risk assessment explicitly identifies the salient risks to workers' rights and describes where in the supply chain these are located.</p> <p>25%: the company's risk assessment explicitly identifies workers' rights risks for at least one material / supply chain and the location/s.</p>	<p>BMW's risk assessment identifies the salient risks to workers' rights in the supply chain, and describes where in the supply chain these are located, by differentiating between Tier 1 and "n-tier" (AR, p. 175).</p> <p>BMW Group Report 2024 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-Report-2024-en.pdf</p>	1

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
	<p>4.3. Prevent, Mitigate and Account</p>	<p>4.3.1. The company actively collaborates with workers and the representative organisation(s) of workers' own choosing to promote respect for workers' rights in its supply chain.</p>	<p>2</p>	<p>25%: the company has a collective agreement with the relevant trade union in the headquartered country.</p> <p>25%: the company has a global framework agreement with IndustriALL for neutrality across all its operations.</p> <p>25%: the company describes the formal mechanisms it has put in place to consult trade unions and/or workers' representatives on the company's workers' rights principles and/or policies.</p> <p>25%: IndustriAll was actively involved in the formulation of the company's workers' rights principles and/or policies.</p>	<p>BMW discloses that between 80-100% of its employees in Germany are covered by worker representation (AR, p. 168). While points are given for the first sub-indicator, it is worth noting the less complete and precise language the company uses compared with last year, in which the company clearly stated that 100% of headquarter employees were represented by a trade union or fell under a collective bargaining agreement (the company now stating that information on "collective agreement coverage" is not reported "due to non materiality" under their ESRS assessment).</p> <p>The company has a global framework agreement with IndustriAll, and in past reporting the company explained that IndustriAll was involved in the elaboration of its workers' rights commitments. BMW has a number of formal mechanisms to consult trade unions. "The BMW Group works in close cooperation with the General Works Council to uphold fair working conditions and respect for human rights, not only for our own employees, but also by suppliers and other business partners, such as sales partners" (AR, p. 161). The company discloses that they conduct "Up to two meetings per year between the BMW EURO Works Council and corporate management", and "employee representatives from production sites outside Europe are also invited to attend" (p. 163).</p> <p>The Economic Committee of the General Works Council has a formal oversight role regarding the company's human rights due diligence process (Group Code on Human Rights and Working Conditions, p. 19). The company's Group Code on Human Rights and Working Conditions was developed in consultation with the BMW EURO Works Council (p. 20). The Code also indicates that questions and concerns related to human rights are handled by a Human Rights Response Team which includes a member of the employee representative body of the affected entity. The team verifies reports and takes the necessary action, including appropriate corrective measures where warranted. "For international entities, a representative of the BMW EURO Works Council will be invited." (p. 18).</p> <p>BMW Group Report 2024 https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/ir/downloads/en/2025/bericht/BMW-Group-Report-2024-en.pdf Group Code on Human Rights and Working Conditions https://www.bmwgroup.com/content/dam/grpw/websites/bmwgroup_com/company/downloads/en/2025/BMW_Group_Compliance_HumanRights_Code_EN.pdf IndustriAll https://www.industrialunion.org/bmw</p>	<p>2</p>

Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points
		4.3.2. The company reports on how it is prepared to respond if it finds non-conformances associated with its workers' rights policy occurring in its operations or supply chains.	1.5	Refer to general HR indicators.	Refer to general HR indicators.	1
		4.3.3. The company works with the relevant trade union and/or worker representative organisation to verify the implementation of corrective actions pertaining to workers' rights.	2	<p>50%: the company specifies that it works with the relevant trade union and/or workers' representatives in the elaboration of corrective action plans.</p> <p>50%: the company specifies that it works with the relevant trade union and/or workers' representatives in the verification of corrective action plan implementation.</p>	Not disclosed	0
	4.4. Remedy	4.4.1 Workers and the representative organisations of workers' own choosing are formally included in the remedy process.	1	<p>50%: the company specifies that trade unions and/or workers' representatives are formally involved in any remedy process concerning breaches of workers' rights in the supply chain.</p> <p>50%: the company provides examples or case studies of remedy provided to workers for confirmed breaches of workers' rights in the supply chain.</p>	Not disclosed	0

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Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	BMW Group analysis	BMW Group Points

Indicator category	% weighting	Normalized weighting
Climate & Environment		
Disclose	100%	1.0
Target setting & progress	150%	1.5
Supply chain levers	200%	2.0
		4.5
Human rights		
Commit	100%	1.0
Identify	150%	1.5
Prevent, Mitigate and Account	200%	2.0
Remedy	200%	2.0
		6.5

Note: Total scores across both categories were taken as an average of the two percentages scored for each one