



## 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 <sup>^</sup>
		General	Steel	Aluminium	Batteries	Total	Total x IM <sup>~</sup>	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%

<sup>^</sup> 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.

<sup>~</sup>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/>

LINKED DATA

**Summary of fossil-free and environmentally sustainable supply chains scores**

Theme	Indicator Category	Indicators	Total Number of Points	Volkswagen Points
<b>1. Fossil Free and Environmentally Sustainable Supply Chains (General)</b>	<b>1.1. Disclosure of emissions, water and deforestation management</b>	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
		<b>DISCLOSE TOTAL</b>	<b>5</b>	<b>2</b>
		<b>DISCLOSE %</b>		<b>40%</b>
	<b>1.2. Target-setting and progress towards fossil free and environmentally sustainable supply chains</b>	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	0.5
		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	0.5
		1.2.6. The company commits to eliminate deforestation and the conversion of all natural ecosystems from their supply chains.	1	0.5
		<b>TARGET-SETTING &amp; PROGRESS TOTAL</b>	<b>7</b>	<b>2.25</b>
	<b>TARGET-SETTING &amp; PROGRESS %</b>		<b>32%</b>	
	<b>1.3. Use of supply chain levers to achieve fossil free and environmentally sustainable supply chains</b>	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	0.6
		1.3.3. The company implements incentives and control systems to eliminate deforestation from its supply chain	1	1
		<b>SUPPLY CHAIN LEVERS TOTAL</b>	<b>3</b>	<b>2.35</b>
		<b>SUPPLY CHAIN LEVERS %</b>		<b>78%</b>
	<b>GENERAL CLIMATE AND ENVIRONMENT - TOTAL % SCORE (WEIGHTED)</b>			
<b>2. Fossil Free and Environmentally Sustainable Steel</b>	<b>2.1. Disclosure of scope 3 GHG emissions due to steel supply chains</b>	2.1.1. The company discloses disaggregated GHG emissions for their steel supply chains.	1	0
		<b>DISCLOSE TOTAL</b>	<b>1</b>	<b>0</b>
		<b>DISCLOSE %</b>		<b>0%</b>
	<b>2.2. Target setting and progress towards fossil free and environmentally sustainable steel supply chains</b>	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
		<b>TARGET-SETTING &amp; PROGRESS TOTAL</b>	<b>6</b>	<b>0</b>
		<b>TARGET-SETTING &amp; PROGRESS %</b>		<b>0%</b>
	<b>2.3. Use of supply chain levers to achieve fossil free and environmentally sustainable steel supply chains</b>	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	0.2
		<b>SUPPLY CHAIN LEVERS TOTAL</b>	<b>6</b>	<b>1.7</b>

Summary of fossil-free and environmentally sustainable supply chains scores				
Theme	Indicator Category	Indicators	Total Number of Points	Volkswagen Points
		SUPPLY CHAIN LEVERS %		28%
	STEEL - TOTAL % SCORE (WEIGHTED)			13%
	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
		TARGET-SETTING & PROGRESS TOTAL	6	0
		TARGET-SETTING & PROGRESS %		0%
	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	0.3
		3.3.3. The company has entered into formal arrangements with suppliers to incentivise investment in and greater production of fossil free aluminium	2	1
		3.3.4. The company integrates improved recyclability of aluminium into automobile design and manufacturing.	2	0.8
		SUPPLY CHAIN LEVERS TOTAL	6	2.1
		SUPPLY CHAIN LEVERS %		35%
	ALUMINIUM - TOTAL % SCORE (WEIGHTED)			16%
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	0.25
		TARGET-SETTING & PROGRESS TOTAL	3	0.25
		TARGET-SETTING & PROGRESS %		8%
	4.3. Use of supply chain levers to achieve fossil free and environmentally sustainable battery supply chains	4.3.1. The company requires all battery manufacturers to use 100% renewable electricity	2	2
		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	0.5

**Summary of fossil-free and environmentally sustainable supply chains scores**

Theme	Indicator Category	Indicators	Total Number of Points	Volkswagen Points
		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	0.5
		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	1
		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	0.5
		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	0.25
		4.3.9. The company has established closed-loop processes in order to maximize the recycling of end-of-life EV batteries	1	0.5
		<b>SUPPLY CHAIN LEVERS TOTAL</b>	<b>11</b>	<b>7</b>
		<b>SUPPLY CHAIN LEVERS %</b>		<b>64%</b>
	<b>BATTERIES - TOTAL % SCORE (WEIGHTED)</b>			<b>31%</b>
<b>Climate Influence</b>	<a href="#">Influence Map Performance Band: https:</a>	Multiplier applied:		1.1

<b>CLIMATE AND ENVIRONMENT - TOTAL NORMALIZED</b>	18.0	<b>5.1</b>
<b>CLIMATE AND ENVIRONMENT - TOTAL % SCORE (WEIGHTED)</b>		<b>28%</b>
<b>CLIMATE AND ENVIRONMENT - TOTAL NORMALIZED + IM MULTIPLIER</b>		<b>5.6</b>
<b>CLIMATE AND ENVIRONMENT - TOTAL % SCORE (WEIGHTED) + IM MULTIPLIER</b>		<b>31%</b>

**Summary of human rights & responsible sourcing scores**

Sub-section	Indicator Category	Indicators	Total Number of Points	Volkswagen points
<b>1. Responsible Sourcing: General HR indicators</b>	<b>1.1. Commit</b>	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	1
		<b>COMMIT TOTAL</b>	<b>3</b>	<b>2</b>
		<b>COMMIT %</b>		<b>67%</b>
	<b>1.2. Identify</b>	1.2.1. The company has a process in place to assess salient human rights risks in their supply chain.	1	0.75
		1.2.2. The company discloses the salient human rights risks in their supply chain and where they are located.	1	1
		1.2.3. The company has a process for identifying high risk supplier categories in their supply chain.	1	1
		<b>IDENTIFY TOTAL</b>	<b>3</b>	<b>2.75</b>
		<b>IDENTIFY %</b>		<b>92%</b>
	<b>1.3. Prevent, Mitigate and Account</b>	1.3.1. The company assesses the risk of adverse human rights impacts with suppliers prior to entering into any contracts.	2	1.5
		1.3.2. The company discloses how it monitors suppliers for compliance with the SCoC during the contract period.	2	1.4
		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
		<b>PREVENT, MITIGATE &amp; ACCOUNT TOTAL</b>	<b>6.5</b>	<b>4.9</b>
	<b>PREVENT, MITIGATE &amp; ACCOUNT %</b>		<b>75%</b>	
	<b>1.4. Remedy</b>	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	0.25
		1.4.4. The company has put in place a remedy process for its supply chain.	2	1
		<b>REMEDY TOTAL</b>	<b>5</b>	<b>2.25</b>
		<b>REMEDY %</b>		<b>45%</b>
<b>GENERAL HUMAN RIGHTS - TOTAL % SCORE (WEIGHTED)</b>				<b>68%</b>
<b>2. Responsible Sourcing of Transition Minerals</b>	<b>2.1. Commit</b>	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
		<b>COMMIT TOTAL</b>	<b>3</b>	<b>2.2</b>
		<b>COMMIT %</b>		<b>73%</b>
	<b>2.2. Identify</b>	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	2
		2.2.2. The company discloses conflict minerals risks in their supply chain and where they are located.	1	0.5
		2.2.3. The company discloses broader transition minerals risks in their supply chain and where they are located.	1	1
		2.2.4. The company publishes a list of smelters or refiners (SoR) in its supply chain	1	1

**Summary of human rights & responsible sourcing scores**

Sub-section	Indicator Category	Indicators	Total Number of Points	Volkswagen points	
		2.2.5. The company discloses which of the SoRs in its supply chain are conformant with the Responsible Minerals Initiative (RMI).	1	0.2	
		<b>IDENTIFY TOTAL</b>	<b>6</b>	<b>4.7</b>	
		<b>IDENTIFY %</b>		<b>78%</b>	
	<b>2.3. Prevent, Mitigate and Account</b>	2.3.1. The company discloses how it monitors suppliers for compliance with the transition minerals due diligence requirements.	2	1.4	
		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	1	
		2.3.4. The company is a member of IRMA and actively engages their suppliers with regards to IRMA mining audits.	2	1.6	
		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	
		<b>PREVENT, MITIGATE &amp; ACCOUNT TOTAL</b>	<b>10.5</b>	<b>6.5</b>	
	<b>PREVENT, MITIGATE &amp; ACCOUNT %</b>		<b>62%</b>		
	<b>2.4. Remedy</b>	2.4.1. The company has put in place a formal mechanism whereby grievances can be raised about SoR facilities.	1	0	
		<b>REMEDY TOTAL</b>	<b>1</b>	<b>0</b>	
		<b>REMEDY %</b>		<b>0%</b>	
<b>TRANSITION MINERALS - TOTAL % SCORE (WEIGHTED)</b>				<b>48%</b>	
<b>3. Indigenous Peoples' Rights and Free Prior and Informed Consent (FPIC)</b>	<b>3.1. Commit</b>	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	1	
		3.1.3. The company requires its tier 1 suppliers to respect Indigenous Peoples' rights	2	0	
		3.1.5. These commitments are translated into the languages used by the impacted Indigenous Peoples.	1	0	
		<b>COMMIT TOTAL</b>	<b>5</b>	<b>1</b>	
		<b>COMMIT %</b>		<b>20%</b>	
	<b>3.2. Identify</b>	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	0.5	
		<b>IDENTIFY TOTAL</b>	<b>1</b>	<b>0.5</b>	
		<b>IDENTIFY %</b>		<b>50%</b>	
	<b>3.3. Prevent, Mitigate and Account</b>	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	1.6	
		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	

Summary of human rights & responsible sourcing scores				
Sub-section	Indicator Category	Indicators	Total Number of Points	Volkswagen points
		<b>PREVENT, MITIGATE &amp; ACCOUNT TOTAL</b>	6	1.6
		<b>PREVENT, MITIGATE &amp; ACCOUNT %</b>		27%
	<b>3.4. Remedy</b>	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
		<b>REMEDY TOTAL</b>	1	0
		<b>REMEDY %</b>		0%
		<b>INDIGENOUS RIGHTS - TOTAL % SCORE (WEIGHTED)</b>		23%
<b>4. Respect for Workers' Rights</b>	<b>4.1. Commit</b>	4.1.1. The company has a commitment to workers' rights	1	0.75
		4.1.2. The company extends their workers' rights commitments to their Tier 1 suppliers and beyond.	2	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.		
		<b>COMMIT TOTAL</b>	3	2.25
		<b>COMMIT %</b>		75%
	<b>4.2. Identify</b>	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	1
		4.2.2. The company discloses the salient workers rights risks in their supply chain and where they are located.	1	1
		<b>IDENTIFY TOTAL</b>	2	2
		<b>IDENTIFY %</b>		100%
	<b>4.3. Prevent, Mitigate and Account</b>	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	1
		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
		<b>PREVENT, MITIGATE &amp; ACCOUNT TOTAL</b>	5.5	2
		<b>PREVENT, MITIGATE &amp; ACCOUNT %</b>		36%
	<b>4.4. Remedy</b>	4.4.1 Workers and the representative organisations of workers' own choosing are formally included in the remedy process.	1	0
<b>REMEDY TOTAL</b>		1	0	
<b>REMEDY %</b>			0%	
		<b>WORKERS' RIGHTS - TOTAL % SCORE (WEIGHTED)</b>		46%
		<b>HUMAN RIGHTS - TOTAL NORMALIZED</b>	26.0	12.1
		<b>HUMAN RIGHTS - TOTAL % SCORE (WEIGHTED)</b>		46%

**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)	Volkswagen Analysis	Volkswagen 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><b>100%:</b> The company discloses scope 3 GHG emissions due to purchased goods and services.</p> <p><b>25%:</b> 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>Volkswagen disaggregates scope 3 GHG emissions due to "purchased goods and services" (2024 AR, p. 293).</p> <p>2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></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"> <li>i. NOx</li> <li>ii. SOx</li> <li>iii. Persistent organic pollutants (POP)</li> <li>iv. Volatile organic compounds (VOC)</li> <li>v. Hazardous air pollutants (HAP)</li> <li>vi. Particulate matter (PM)</li> <li>vii. Other standard categories of air emissions identified in relevant regulations</li> </ul> <p>The following scores are absolute not cumulative:</p> <p><b>100%:</b> the company discloses significant emissions against all of the above categories <b>by key suppliers</b> 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><b>50%:</b> the company discloses significant emissions against some of the above categories <b>for part</b> of its supply chain.</p>	<p>VW discloses air emissions (VOC, NOx, SO<sub>2</sub>, etc.) only for its own operations and only for sites that exceeded the threshold as defined by the E-PRTR (2024 AR, p. 307). It does not cover the supply chain.</p> <p>2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></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"> <li>- water withdrawn</li> <li>- water consumed</li> <li>- water discharged</li> </ul> <p>The following scores are absolute not cumulative:</p> <p><b>100%:</b> 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><b>50%:</b> the company provides data against some of the above indicators <b>for part of</b> its supply chain.</p>	<p>VW discloses water consumption, withdrawals and wastewater discharge for its own operations (Volkswagen Group and companies with operational control) (2024 AR, p. 317). It does not cover the supply chain.</p> <p>2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></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)	Volkswagen Analysis	Volkswagen Points
		1.1.4. The company discloses deforestation and conversion-free commodity volumes from its supply chain	1	<p><b>50%:</b> 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.</p> <p><b>OR</b></p> <p><b>25%:</b> The company discloses deforestation and conversion-free commodity volumes from at least one of its key high-risk hard commodities</p> <p><b>50%:</b> 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.</p> <p><b>OR</b></p> <p><b>25%:</b> The company discloses deforestation and conversion-free commodity volumes from at least one of its key high-risk soft commodities</p> <p><b>MODIFIER:</b> 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>VW indicates that its 2024 activities focused on preparing for the requirements of the new EUDR by establishing the necessary internal structures and processes, such as the implementation of an IT-based traceability system and the development of a compliance management system (2024 Raw Materials Report, p. 59). However, the company does not provide quantitative disclosure yet.</p> <p>2024 Responsible Raw Materials Report (RMR)  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></p>	0
	<b>1.2. Target-setting and progress towards fossil free and environmentally sustainable supply chains</b>	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	<p>The following scores are absolute, not cumulative:</p> <p><b>100%:</b> the company has disclosed <b>verified science-based</b> targets that include scope 3, including 2050 (or sooner) and interim year target(s), and <b>has also disclosed a disaggregated interim target for upstream/purchased goods (scope 3 category 1)</b></p> <p><b>50%:</b> 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 <b>if its target(s) has been</b> verified as science-based.</p> <p><b>25%:</b> the company only discloses a 2050 zero emissions target with no interim target and/or does not specify upstream/purchased goods.</p>	<p><u><a href="#">VW has a goal to achieve net carbon neutrality by 2050. The intermediate target is to reduce the carbon footprint per kilometer traveled during the use phase of its passenger cars and light commercial vehicles by 30% by 2030 (compared to 2018) (2024 AR, p. 236). This target has also been independently certified by the SBTi as 2°C aligned (2024 AR, p. 268). A further goal is for global production sites to achieve net carbon neutrality by 2040 (ten years earlier than originally planned) (2024 AR, p. 236). However, these targets do not cover upstream/purchased goods.</a></u></p> <p><u><a href="#">Previously in its 2023 Sustainability Report (p. 62), VW disclosed that "By 2030, the Group wants to emit 30% less CO2 on average per vehicle (passenger cars and light commercial vehicles) over the entire life cycle than in 2018. The targets are to be achieved through pure CO2 reduction." Points were awarded in last year's assessment due to some ambiguity in VW's disclosure regarding the scope of the "entire life cycle" target, which allowed for the assumption that upstream emissions were included. In its 2024 disclosure, VW made it clear that the 2030 target only covers the use phase of Scope 3 emissions, thus not eligible for the second sub-indicator, which requires a lifecycle target that includes upstream/purchased goods.</a></u></p> <p>2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></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)	Volkswagen Analysis	Volkswagen 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><b>100%:</b> 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><b>75%:</b> the company requires all its tier 1 suppliers set science-based targets.</p> <p><b>50%:</b> the company commits to having at least 70% of its key suppliers by emissions setting science-based targets within 2 years.</p> <p><b>25%:</b> 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><b>0%:</b> Company does not have a commitment.</p>	<p>VW states that “we require our business partners to take proactive steps to reduce GHG emissions along the entire supply chain, such as by increasing their use of carbon-neutral energy sources” (2024 AR, p. 272).</p> <p>Additionally, VW states that “We also recommend that our business partners set science- and time-based emission reduction targets as well as targets for the use of renewable energies in line with the Paris Climate Agreement, and to take action to promote decarbonization along the entire value chain. We also recommend that our business partners commit to the Paris Climate Agreement and strive to achieve carbon neutrality by 2050.” However, these are recommendations and not mandatory requirements.</p> <p>For new vehicle projects, VW intends to make CO<sub>2</sub> emissions a technical feature, which means that binding CO<sub>2</sub>e targets will be set for suppliers within the EU for relevant components (p. 282), but this is not yet a fully time-bound target.</p> <p>2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></p>	0.25
		1.2.3. The company discloses the current percentage of suppliers providing science-based targets.	1	<p><b>25%:</b> the company discloses the current percentage of tier 1 suppliers providing science-based targets.</p> <p><b>25%:</b> the company discloses the current number and/or percentage of tier 2 suppliers providing science-based targets.</p> <p><b>25%:</b> additional points for over 50% of tier 1 suppliers providing science-based targets</p> <p><b>25%:</b> additional points for all tier 1 suppliers providing science-based targets.</p>	<p>Not disclosed.</p>	0
		1.2.4. The company requires all significant suppliers to set water reduction targets and disclose their water usage.	1	<p><b>50%:</b> the company requires tier 1 suppliers to set water reduction targets</p> <p><b>50%:</b> 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"> <li>- water withdrawn</li> <li>- water consumed</li> <li>- water discharged</li> </ul>	<p>In its CoC for Business Partners (p. 20), VW requires “Business partners that supply products to the Volkswagen Group provide, upon request, the Volkswagen Group with information on total fresh water consumption on product level.” They are not required to set targets.</p> <p>Code of Conduct for Business Partners (CoC BP)  <a href="https://www.volkswagen-group.com/en/publications/more/code-of-conduct-for-business-partner-1885">https://www.volkswagen-group.com/en/publications/more/code-of-conduct-for-business-partner-1885</a></p>	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	<p><b>50%:</b> The company has a process that includes reducing GHGs and other environmental impacts, and includes targets as a basis for compliance.</p> <p><b>OR</b></p> <p><b>25%:</b> The company has a process that includes reducing GHGs and other environmental impacts, but lacks targets as a basis for compliance.</p> <p><b>PLUS</b></p> <p><b>25%:</b> the company provides quantitative information of the number of suppliers audited and the tiers that are audited.</p> <p><b>25%:</b> the company provides qualitative case studies of how they have engaged suppliers on their targets.</p>	<p>Volkswagen discloses the number of “S rating” audits that it has conducted (a total of 85) in 2024 (2024 AR, p. 404). It also uses the self-assessment questionnaire (SAQ) that was developed in collaboration with DRIVE Sustainability to assess suppliers’ environmental impact management and compliance. Although VW monitors suppliers for environmental impacts and efforts in decarbonization, it is unclear whether the company uses targets as a basis for compliance.</p> <p>2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></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)	Volkswagen Analysis	Volkswagen 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><b>100%:</b> The company has time-bound targets to eliminate deforestation and the conversion of natural ecosystems from their supply chain.</p> <p>OR</p> <p><b>100%:</b> 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><b>75%:</b> 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><b>75%:</b> 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><b>50%:</b> 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><b>50%:</b> 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><b>25%:</b> 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>Volkswagen has a general commitment to halt deforestation to comply with the EU regulation (2024 RMR, p. 59). As a member of the Sustainable Natural Rubber Initiative, the company has a commitment not to source natural rubber from areas deforested or degraded after the 1 April 2019 cutoff date.</p> <p>High Level Commitment on Responsible Sourcing of Natural Rubber - <a href="https://www.vwgroupsupply.com/one-kbp-pub/media/kbp_public/documents_2/zusammenarbeit/2022-04-22_VW_High_Level_Commitment_EN.pdf">https://www.vwgroupsupply.com/one-kbp-pub/media/kbp_public/documents_2/zusammenarbeit/2022-04-22_VW_High_Level_Commitment_EN.pdf</a></p> <p>2024 Responsible Raw Materials Report (RMR) <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></p>	0.5
	<b>1.3. Use of supply chain levers to achieve fossil free and environmentally sustainable supply chains</b>	1.3.1. The company incentivises suppliers to reduce GHG and other significant air emissions.	1	<p><b>50%:</b> the company specifies that sustainability and/or ESG are included as factors for choosing a preferred supplier.</p> <p><b>25%:</b> the company specifies that GHG emissions are included in the tender and contracting process.</p> <p><b>25%:</b> 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>Volkswagen uses the S-rating tool to assess the sustainability performance of relevant suppliers in the fields of the environment, social aspects and integrity and to mitigate risks. The S-Rating has been a condition for the award of contracts since 2019 (2024 AR, p. 403). However, VW does not mention "other significant air emissions" as a factor in the tender and contracting process.</p> <p>2024 Annual Report <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></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)	Volkswagen Analysis	Volkswagen Points
		1.3.2. The company implements incentives and control systems to improve water management by suppliers	1	<p><b>20%:</b> 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><b>40%:</b> 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><b>40%:</b> 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>In its CoC for Business Partners (p. 20), VW requires its business partners to take measures to minimise water consumption and provide water consumption data upon request.</p> <p>More specifically, VW refers to the Lithium Partnership initiative in Chile as an example of its approach in managing water risks by suppliers, where it identified water risks in the lithium supply chain and engages with multiple stakeholders to protect the catchment area's water resources through a joint action plan (2024 AR, p. 314).</p> <p>VW does not disclose information about how the company integrates considerations on water impacts into the tender and contracting process for (potential) new suppliers.</p> <p>Code of Conduct for Business Partners (CoC BP)  <a href="https://www.volkswagen-group.com/en/publications/more/code-of-conduct-for-business-partner-1885">https://www.volkswagen-group.com/en/publications/more/code-of-conduct-for-business-partner-1885</a></p> <p>2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></p>	0.6
		1.3.3. The company implements incentives and control systems to eliminate deforestation from its supply chain	1	<p><b>20%:</b> 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><b>40%:</b> 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><b>40%:</b> 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><a href="#">VW states in its CoC for Business Partners (p. 20) that "Business partners must strive to ensure supply chains are free of deforestation and conversion in accordance with applicable law and international biodiversity regulations."</a></p> <p><a href="#">VW identifies deforestation as a risk for specific commodities such as copper, leather and rubber, and uses contractually binding sustainability specification sheets for all new contracts with direct business partners that supply focus products containing any of the raw materials in scope. The specification sheets "stipulate the way in which certain products must be manufactured, thus defining our raw-material-specific expectations of our suppliers with regard to human rights and the environment" (2024 RMR, p. 11). For example, the company's leather specification sheet requires suppliers to achieve LWG (Leather Working Group) Bronze certification or higher (2024 RMR, p. 51). VW also plans to update the specification sheet in 2025 and introduce additional risk mitigation measures (2024 RMR, p. 51).</a></p> <p><a href="#">Additionally, VW has set up systems to manage deforestation risks by existing suppliers. For example, in the case of rubber, the company launched a pilot project for a "natural rubber specification sheet in the tire supply chain," which "requires suppliers to take measures to improve transparency within their natural rubber supply chain and ask them to establish an appropriate due diligence management system according to the criteria of the OECD Guidance for Responsible Agricultural Supply Chains." VW also discloses that the company has broadened the scope of its rubber risk assessment so that it includes not only tires, but also many other rubber-containing parts. To do this, the company identified the direct suppliers in scope and began to map their upstream supply chains, using a software platform to collect data and perform risk management with AI tools and satellite geolocation data (2024 RMR, p. 59).</a></p> <p>Code of Conduct for Business Partners (CoC BP)  <a href="https://www.volkswagen-group.com/en/publications/more/code-of-conduct-for-business-partner-1885">https://www.volkswagen-group.com/en/publications/more/code-of-conduct-for-business-partner-1885</a></p> <p>2024 Responsible Raw Materials Report (RMR)  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></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)	Volkswagen Analysis	Volkswagen 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><b>100%:</b> The company discloses scope 3 GHG emissions for purchased goods and services, disaggregated for their steel supply chains</p> <p><b>50%:</b> 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>	Not disclosed.	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><b>100%:</b> 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><b>80%:</b> 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><b>60%:</b> the company has set a target to source at least 10% fossil-free steel OR 50% lower emission steel by 2030.</p> <p><b>40%:</b> 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><b>20%:</b> 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><i>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.</i></p>	Not disclosed.	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	<p>The scores below are absolute, not cumulative:</p> <p><b>100%:</b> The company discloses the current percentage of lower emission and/or fossil-free steel in its production cycle</p> <p><b>50%:</b> 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

**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)	Volkswagen Analysis	Volkswagen Points
		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><b>100%:</b> the company discloses a target to use at least 38% recycled steel by 2030, aligned with the <a href="#">IEA Net Zero Roadmap (2023 version)</a>. <b>The target includes a specific commitment or target for increasing the use of post-consumer scrap.</b></p> <p><b>75%:</b> 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><b>50%:</b> the company discloses a target for the use of recycled steel below the 38% threshold <b>and lacks detail on scrap type.</b></p>	<p>VW discloses an overall target of using 40% circular materials in its vehicles from 2040 onwards (excluding China), but does not disaggregate it by material (2024 AR, p. 330).</p> <p>2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></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><b>100%:</b> 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><b>75%:</b> the company discloses the percentage of recycled steel in their annual production cycle.</p> <p><b>50%:</b> 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>	<p>VW only discloses the aggregate amount and percentage for all reused or secondary recycled components, products, and materials, without disaggregating by material (2024 AR, p. 339).</p> <p>2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></p>	0
	<b>2.3. Use of supply chain levers to achieve fossil free and environmentally sustainable steel supply chains</b>	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	<p><b>50%:</b> the company is a member of SteelZero.</p> <p><b>50%:</b> the company is a member of the First Movers Coalition's sector group on steel</p>	<p>VW is not a member of SteelZero or the First Movers Coalition's sector group on steel.</p> <p><a href="https://www.theclimategroup.org/steelzero-members">https://www.theclimategroup.org/steelzero-members</a>  <a href="https://initiatives.weforum.org/first-movers-coalition/community">https://initiatives.weforum.org/first-movers-coalition/community</a></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)	Volkswagen Analysis	Volkswagen Points
		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	<p><b>25%:</b> the company is a member of ResponsibleSteel.</p> <p><b>50%:</b> the company actively engages their steel suppliers regarding ResponsibleSteel certification.</p> <p><b>25%:</b> 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>VW is not a member of ResponsibleSteel. However, the company indicates that “The Volkswagen Group is continuously evaluating the options for joining specific industry initiatives for steel and suitable certification opportunities” in its 2024 RMR (p. 67).</p> <p><a href="https://www.responsiblesteel.org/members-and-associates">https://www.responsiblesteel.org/members-and-associates</a> 2024 Responsible Raw Materials Report (RMR) <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></p>	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	<p><b>50%:</b> 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 <b>lower emission or fossil-free</b> steel.</p> <p><b>25%:</b> at least one purchase agreement signed by the company with a steel supplier for the provision of <b>lower emission or fossil-free</b> 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><b>25%:</b> 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><a href="#">In its 2024 RMR (p. 67), VW discloses that “the Group is aiming to increase the share of low-carbon green steel used in its vehicles and is extending its partnerships with suppliers of steel produced with hydrogen and renewable energy.”</a></p> <p><a href="#">Previously in its 2022 Sustainability Report (p. 71), VW disclosed a partnership between its subsidiary Scania and the start-up H2 Green Steel for steel produced using green hydrogen. Additionally, VW signed an MOU with Salzgitter AG to become one of the first customers for its low-CO<sub>2</sub> steel, which is expected to be produced via a new process at Salzgitter’s Lower Saxony site starting in late 2025. However, VW does not disclose the scale of these agreements.</a></p> <p><a href="#">Additionally, in June 2024, VW discloses that “Volkswagen AG and Vulcan Green Steel have signed a Memorandum of Understanding (MoU) for a partnership for low-carbon steel”. According to VW, “Starting in 2027, Vulcan Green Steel will produce automotive grades and other high-strength steels in Oman. Natural gas will be used in the Duqm operations during the initial years and later the operations will be switched over to green energy in a move that will cut carbon emissions by 70% once the transition is complete.” VW discloses that the supply from Vulcan Green Steel will cover a significant proportion of total steel requirements in Europe (up to 300,000 tons). However, this is only disclosed in VW’s press release and not in any other official reporting. Thus it is not taken into consideration for assessment.</a></p> <p><a href="#">2024 Responsible Raw Materials Report (RMR)</a> <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></p> <p><a href="#">2022 Sustainability Report</a> <a href="https://uploads.vw-mms.de/system/production/documents/cws/001/644/file_en/7acea9ea244714660b1ba82d80e4acc4bc21c752/2022_Sustainability_Report.pdf?1687875516&amp;disposition=attachment">https://uploads.vw-mms.de/system/production/documents/cws/001/644/file_en/7acea9ea244714660b1ba82d80e4acc4bc21c752/2022_Sustainability_Report.pdf?1687875516&amp;disposition=attachment</a></p> <p><a href="#">Press release: Low-carbon steel: Volkswagen AG and Vulcan Green Steel enter into partnership</a> <a href="https://www.volkswagen-group.com/en/press-releases/low-carbon-steel-volkswagen-ag-and-vulcan-green-steel-enter-into-partnership-18450">https://www.volkswagen-group.com/en/press-releases/low-carbon-steel-volkswagen-ag-and-vulcan-green-steel-enter-into-partnership-18450</a></p>	1.5

**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)	Volkswagen Analysis	Volkswagen Points
		2.3.4. The company integrates improved recyclability of steel into automobile design and manufacturing.	2	<p><b>25%:</b> the company <b>discloses that it is implementing</b> a closed-loop process for steel recycling (must include reference to post-consumer scrap).</p> <p><b>OR</b></p> <p><b>10%:</b> the company discloses that it is implementing a closed-loop process for steel recycling (no reference to post-consumer scrap).</p> <p><b>PLUS</b></p> <p><b>25%:</b> the company <b>provides a qualitative description of the closed-loop process(es) it is implementing for steel recycling.</b></p> <p><b>25%:</b> the company <b>discloses that it improves the recyclability of steel through automotive and/or component design.</b></p> <p><b>25%:</b> the company <b>explains how</b> it has used automotive and/or component design to improve the recyclability of steel (<b>e.g. by minimizing copper contamination</b>).</p>	<p>In its 2024 AR (p. 331), VW discloses that “The initial steps in relation to circular economy concentrated on batteries, steel, aluminum and plastics. The results obtained from this are used to further develop the overall circular economy strategy and to devise new business models.” This indicates that there is a closed-loop process for steel. However, the company does not provide any detail about the closed-loop process and whether this process includes post-consumer steel. The company does not provide any detail of how it uses automotive or component design to improve the recyclability of steel.</p> <p>2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></p>	0.2
<b>3.Fossil Free and Environmentally Sustainable Aluminium</b>	<b>3.1. Disclosure of scope 3 GHG emissions due to aluminium</b>	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><b>100%:</b> The company discloses scope 3 GHG emissions for purchased goods and services, disaggregated for their aluminum supply chains</p> <p><b>50%:</b> 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>	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)	Volkswagen Analysis	Volkswagen Points
	<p><b>3.2. Target setting and progress towards fossil free and environmentally sustainable aluminum supply chains</b></p>	<p>3.2.1 The company has set targets for the use of fossil free and environmentally sustainable aluminium</p>	2	<p>The scores below are not additive. They indicate specific thresholds for getting that percentage of points:</p> <p><b>100%:</b> the company has a commitment to source <b>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</b></p> <p><b>80%:</b> 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><b>60%:</b> the company has set a target of <b>procuring at least 10% fossil-free aluminium by 2030</b></p> <p><b>40%:</b> the company has set an emissions reduction target for its aluminium supply chain that is aligned with <b>the IEA Net Zero Roadmap (2023 version), specifically a 27% reduction by 2030 and by 95% by 2050</b></p> <p><b>20%:</b> the company has a commitment to net zero aluminium by 2050 and/or a 2030 emissions reduction target for its aluminium supply chain <b>that falls short of the above-mentioned thresholds</b></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>VW states that “Aluminum is one of the Volkswagen Group’s focus materials for the decarbonization of its supply chain. The goal is to increase the share of recycled materials as well as the share of low-carbon aluminum in our supply chain.” (2024 RMR, p. 44). However, the company does not disclose a time-bound target.</p> <p>2024 Responsible Raw Materials Report (RMR)  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></p>	0
		<p>3.2.2. The company publishes progress towards their target by disclosing the current percentage of <b>fossil-free and/or lower emission</b> aluminium in their annual production cycle</p>	1	<p>The following scores are absolute, not cumulative:</p> <p><b>100%:</b> The company discloses the current percentage of <b>fossil-free and/or lower emission</b> aluminium in its supply chain</p> <p><b>50%:</b> <b>The company partially discloses the quantity of fossil-free and/or lower emission aluminium 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.</b></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)	Volkswagen Analysis	Volkswagen Points
		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><b>100%:</b> the company discloses a target to use at least <b>42%</b> recycled aluminium by 2030, aligned <b>with the IEA Net Zero Roadmap (2023 version)</b>. <b>The target includes a specific commitment or target for increasing the use of post-consumer aluminium scrap.</b></p> <p><b>75%:</b> the company discloses a target to use at least <b>42% of recycled aluminium by 2030, but does not specify a target for post-consumer scrap</b></p> <p><b>50%:</b> the company discloses a target for the use of recycled steel below the 42% threshold <b>and lacks detail on scrap type</b></p>	<p>VW discloses an overall target of using 40% circular materials in its vehicles from 2040 onwards (excluding China), but does not disaggregate it by material (2024 AR, p. 330).</p> <p>2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></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><b>100%:</b> 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><b>75%:</b> the company discloses the percentage of recycled aluminium in their annual production cycle.</p> <p><b>50%:</b> 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><a href="#">VW only discloses the aggregate amount and percentage for all reused or secondary recycled components, products, and materials, without disaggregating by material (2024 AR, p. 339).</a></p> <p><a href="#">2024 Annual Report</a>  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></p>	0
	<b>3.3. Use of supply chain levers to achieve fossil free and environmentally sustainable aluminium supply chains</b>	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	<b>100%:</b> the company is a member of First Movers Coalition sector group on aluminum	<p>Volkswagen is not a member of First Movers Coalition sector group on aluminum.</p> <p><a href="https://initiatives.weforum.org/first-movers-coalition/community">https://initiatives.weforum.org/first-movers-coalition/community</a></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)	Volkswagen Analysis	Volkswagen Points
		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	<p><b>25%:</b> the company is a member of the Aluminum Stewardship Initiative (ASI).</p> <p><b>50%:</b> the company actively engages their aluminum suppliers regarding ASI certification.</p> <p><b>25%:</b> the company has disclosed purchasing commitments for ASI certified aluminum.</p> <p>Note: 0.4 points modifier applied due to multistakeholder initiative assessment. See sheet 8.</p>	<p>VW discloses that Audi engages in the ASI on behalf of the Volkswagen Group (Audi is a member of ASI), and that it encourages aluminium producers to join the ASI and commits to increase market demand for ASI-certified material (2024 RMR, p. 44). It does not specify whether it already procures ASI certified aluminium.</p> <p><a href="https://aluminium-stewardship.org/about-asi/members">https://aluminium-stewardship.org/about-asi/members</a>                      2024 Responsible Raw Materials Report (RMR)  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRM24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRM24_gesamt_offen.pdf?1743501339</a></p>	0.3
		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><b>50%:</b> 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 <b>lower emission or fossil-free</b> aluminium.</p> <p><b>25%:</b> at least one purchase agreement signed by the company with an aluminium supplier for the provision of <b>lower emission or fossil-free</b> 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><b>25%:</b> 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>VW discloses that its subsidiary “Porsche has partnered with the Norwegian aluminium supplier Hydro for the use of low-carbon primary aluminium as well as secondary aluminium with a high proportion of recycled material in its vehicles.” (2024 RMR, p. 44) This indicates that the company has at least one formal arrangement with an aluminium supplier of lower emission or fossil-free aluminium. The company does not disclose further detail about the agreement.</p> <p>2024 Responsible Raw Materials Report (RMR)  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRM24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRM24_gesamt_offen.pdf?1743501339</a></p>	1
		3.3.4. The company integrates improved recyclability of aluminium into automobile design and manufacturing.	2	<p><b>25%:</b> the company <b>discloses that it is implementing</b> a closed-loop process for aluminium recycling (must include reference to post-consumer scrap).</p> <p><b>OR</b></p> <p><b>10%:</b> the company discloses that it is implementing a closed-loop process for aluminium recycling (no reference to post-consumer scrap).</p> <p><b>PLUS</b></p> <p><b>25%:</b> the company provides a qualitative description of the closed-loop process(es) it is implementing for aluminium recycling.</p> <p><b>25%:</b> the company discloses that it improves the recyclability of aluminium through automotive and/or component design.</p> <p><b>25%:</b> the company <b>explains how</b> it has used automotive and/or component design to improve the recyclability of aluminium (e.g. through the development of new alloys).</p>	<p><u><a href="#">VW states that a closed loop for aluminum was achieved for the first time in the Audi Neckarsulm plant in 2017 with the Aluminum Closed Loop Project (2024 AR, p. 335), through which “the waste from aluminum sheetmetal parts from the press shop is sent directly back to the suppliers, who recycle the waste and use it to produce new material that Audi then uses again in the press shop.” Volvo also states that “In addition to the Audi plants in Ingolstadt/Germany, Neckarsulm/Germany and Győr/Hungary and the multibrand plant in Bratislava/Slovakia, the Audi Münchsmünster and Volkswagen Emden sites in Germany have been part of the aluminum closed loop process since 2024.”</a></u></p> <p><u><a href="#">VW provides an additional example of closed-loop aluminium recycling for its Kassel site in Germany, where “all aluminium chips generated... are returned to the casting process in the foundry. Almost 15 tons of aluminium chips are produced in Kassel each day and melted down in the plant.”</a></u></p> <p><u><a href="#">However, VW does not disclose whether any of these initiatives include efforts to recycle post-consumer aluminium scrap (they all seem to be limited to manufacturing scrap) or how it uses design to improve the recyclability of aluminium.</a></u></p> <p>2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgI">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgI</a></p>	0.8

**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)	Volkswagen Analysis	Volkswagen 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><b>100%:</b> 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><b>75%:</b> 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><b>50%:</b> The company discloses scope 3 GHG emissions for purchased goods and services, disaggregated for their battery supply chain.</p> <p><b>25%:</b> 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><b>100%:</b> 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><b>75%:</b> 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><b>50%:</b> 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><b>25%:</b> 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>	<p>VM indicates that in new contracts for high-voltage batteries for the European market, suppliers are already obliged to comply with CO2e limits (2024 AR, p. 282). But the company does not disclose a specific, quantitative target to reduce the overall emissions from its battery supply chain.</p> <p>2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></p>	0
		4.2.2. The company has set a target to reduce reliance on energy intensive minerals in battery production.	1	<p><b>25%:</b> statement of intent to reduce high intensity minerals in battery production (which may include a commitment to producing smaller batteries).</p> <p><b>25%:</b> the company has set a disaggregated target for the reduction of primary sources of <b>nickel</b> in their supply chain.</p> <p><b>25%:</b> the company has set a disaggregated target for the reduction of primary sources of <b>lithium</b> in their supply chain.</p> <p><b>25%:</b> the company has set a disaggregated target for the reduction of primary sources of <b>cobalt</b> 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>	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)	Volkswagen Analysis	Volkswagen Points
		4.2.3. The company has set collection and/or recovery targets for high intensity battery metals.	1	<p><b>100%:</b> the company has a medium term target of 95% recovery for cobalt &amp; nickel with 70% lithium by 2030 (equal to that proposed by the EU) and a short term target of 90% recovery rate for cobalt &amp; nickel and 35% lithium by 2025.</p> <p><b>25%:</b> 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>	<p>Volkswagen disclose that they opened the Group's first pilot facility for recycling high-voltage vehicle batteries at the start of 2021, where their objective is "industrialized recovery of valuable raw materials such as lithium, nickel, manganese and cobalt in a closed loop and also of aluminum, copper and plastic, with a recycling rate of more than 90% in the future." (2023 Sustainability Report, p. 86; 2022 Sustainability Report, p. 71).</p> <p>2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></p>	0.25
	<b>4.3. Use of supply chain levers to achieve fossil free and environmentally sustainable battery supply chains</b>	4.3.1. The company requires all battery manufacturers to use 100% renewable electricity	2	<p>The following scores are absolute, not cumulative:</p> <p><b>100%:</b> the company discloses a requirement that all battery manufacturers are required to use 100% renewable electricity.</p> <p><b>50%:</b> the company discloses agreements/requirements for 100% renewable energy with some battery manufacturers</p> <p><b>25%:</b> the company discloses agreements/requirements for reduced emissions with some battery manufacturers</p> <p>or</p> <p><b>50%:</b> 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>VW indicates that "In new contracts for high-voltage batteries for the European market, suppliers are already obliged to comply with CO2e limits. In the case of existing supply contracts for current MEB vehicle projects, suppliers are required to use certified power from renewable sources in their production." (2024 AR, p. 282)</p> <p>2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></p>	2

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)	Volkswagen Analysis	Volkswagen Points
		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	<p><b>25%:</b> the company has identified and disclosed specific environmental risks of lithium sourcing (e.g. air pollution, water, biodiversity etc.).</p> <p><b>25%:</b> 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><b>25%:</b> 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&amp;D.</p> <p><b>25%:</b> 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>VW discloses key environmental risks of lithium sourcing in the 2024 RMR, particularly water pollution and consumption (p. 27). VW provides extensive details on the measures it is implementing across its supply chain to mitigate these risks. For example, the company states that, starting from 2025, the Volkswagen Group's battery manufacturer PowerCo will be directly supplied with lithium (2024 RMR, p. 28). PowerCo's raw material supply mechanisms include long-term supply contracts and investments with partners in its own mines, aiming to provide a direct lever for improving environmental and social conditions (p. 26). VW is also a founding member of the Responsible Lithium Partnership in Chile, focused on the responsible use and protection of water resources in the Salar de Atacama region (2024 RMR, p. 28).</p> <p>Previously, VW disclosed in its 2023 RMR that "The Volkswagen Group joined IRMA in 2022 and is committed to rolling out the IRMA standard across the battery supply chains through contractual obligations. This applies to both our current battery suppliers and the new suppliers for PowerCo." (p. 35) and that "We use the IRMA reports for our risk assessment, and the IRMA standard is a prerequisite for direct lithium procurement." (p. 26) This commitment is reaffirmed in its 2024 RMR (p. 26), that "In high-risk countries, we strive to ensure that our raw material suppliers only use lithium, cobalt, nickel and natural graphite from IRMA assessed mines. Following a supplier's commitment to obtaining IRMA assessment, we continuously monitor their progress and remain closely involved... We also seek a contractual commitment to continuous improvement in order to increase the IRMA performance level over time."</p> <p>VW has engaged directly with two lithium mining companies and two mid-stream companies regarding their progress toward IRMA assessment. Specifically, VW identifies Talison Lithium in Australia as a supplier that committed to undergoing the IRMA assessment in 2024 (2024 RMR, p. 29). VW discloses that it promotes IRMA assessments by its lithium suppliers to address environmental risks such as "the safe management of hazardous substances, including mining tailings." (2024 RMR, p. 29)</p> <p>The company does not disclose any purchase agreements for low CO2 lithium.</p> <p>2024 Responsible Raw Materials Report (RMR)  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></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)	Volkswagen Analysis	Volkswagen Points
		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	<p><b>25%:</b> the company has identified and disclosed specific environmental risks of nickel sourcing (e.g. air pollution, water, biodiversity etc.).</p> <p><b>25%:</b> 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><b>25%:</b> 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&amp;D.</p> <p><b>25%:</b> 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>VW discloses key environmental impacts of nickel sourcing in the 2024 RMR, including hazardous substances, air pollution, water (including marine environment), handling and disposal of waste, soil pollution and land degradation, and loss of biodiversity (p. 32).</p> <p>VW discloses a range of measures that is implementing to mitigate these risks, including seeking "to contractually commit our nickel suppliers to international standards such as the IRMA standard", participating in the RMI working group on nickel, and conducting due diligence field trips to Indonesia and Canada "to assess environmental, social and governance (ESG) risks related to nickel mining" (2024 RMR, p. 33-34).</p> <p>Although VW mentions that it engages with mining companies during its field trips to Indonesia and Canada, it is not clear whether these companies are suppliers and the company does also not explain how it engaged with these companies to address specific environmental risks in these contexts. VW also does not disclose any purchase agreements for low CO2 nickel. Thus the company does not get points for the third and fourth sub-indicators.</p> <p>2024 Responsible Raw Materials Report (RMR)  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></p>	0.5
		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	<p><b>25%:</b> the company has identified and disclosed specific environmental risks of cobalt sourcing (e.g. air pollution, water, biodiversity etc.).</p> <p><b>25%:</b> 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><b>25%:</b> 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&amp;D.</p> <p><b>25%:</b> 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>VW has identified specific environmental risks of cobalt sourcing in its 2024 RMR, including hazardous substances, water pollution including marine environment, handling and disposal of waste, soil pollution and land degradation, and loss of biodiversity (p. 30).</p> <p>VW discloses that its mitigation strategy for these risks includes seeking "a contractual commitment to international standards such as those developed by IRMA or RMI (RMAP)", and participating in the RMI working groups on cobalt and emerging minerals. Regarding IRMA auditing, VW states that, "in high-risk countries, we strive to ensure that our raw material suppliers only use lithium, cobalt, nickel and natural graphite from IRMA assessed mines. Following a supplier's commitment to obtaining IRMA assessment, we continuously monitor their progress and remain closely involved. One priority topic is the safe management of hazardous substances, including mining tailings. We also seek a contractual commitment to continuous improvement in order to increase the IRMA performance level over time."</p> <p>VW does not disclose any examples of direct engagement with cobalt suppliers on environmental risks or purchase agreements for low CO2 cobalt.</p> <p>2024 Responsible Raw Materials Report (RMR)  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></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)	Volkswagen Analysis	Volkswagen 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	<b>100%:</b> the company is a member of the Global Battery Alliance.	Volkswagen is a member of the Global Battery Alliance. <a href="https://www.globalbattery.org/about/members/">https://www.globalbattery.org/about/members/</a>	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><b>25%:</b> the company provides examples of R&amp;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&amp;D into the development of smaller batteries.</p> <p><b>25%:</b> the company provides examples of the systems and processes it is developing to scale this R&amp;D to commercial production.</p> <p><b>50%:</b> the company has brought to market electric vehicles that utilize battery chemistries / technologies that meet the above criteria.</p>	<p>VW founded its battery subsidiary PowerCo in 2022 (2024 AR, p. 281). “The PowerCo cell factories have been designed on the basis of a technology matrix that will factor in more than 30 foreseeable product and process innovations by the end of the decade. These include, for example, more sustainable cell chemicals without cobalt or nickel, solid-state technology.” (2023 Sustainability Report, p. 55).</p> <p>VW also discloses that “In the reporting year, three Group-owned sites for battery cell production were under construction, including the main plant in Salzgitter, Valencia/Spain, and St. Thomas/Canada. All sites are to be consistently operated with electricity from low-carbon sources.” This indicates that the company is expanding the R&amp;D to commercial production.</p> <p>2023 Sustainability Report  <a href="https://www.volkswagen-group.com/en/publications/more/group-sustainability-report-2023-2674">https://www.volkswagen-group.com/en/publications/more/group-sustainability-report-2023-2674</a>                      2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></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)	Volkswagen Analysis	Volkswagen 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><b>25%:</b> the company provides examples of R&amp;D that they are conducting in-house or in partnership with value chain partners to improve the recyclability of batteries (i.e. recovery rates). <i>Note this could include R&amp;D into battery design and/or recycling methods.</i></p> <p><b>25%:</b> the company provides examples of the systems and processes it is developing to scale this R&amp;D to commercial production.</p> <p><b>50%:</b> 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 &amp; 70% lithium. Note disclosed recovery rates achieved at the pilot / R&amp;D stage are valid for points here. Disclosure of recovery rates achieved at commercial scale is evaluated in indicator 4.3.10.</p>	<p>VW is involved in the research consortium HVBatCycle that aims to prove that the most valuable components of traction batteries can be recovered and reused several times in succession through recycling (2024 AR, p. 335). This provides an example of R&amp;D to improve the recyclability of batteries.</p> <p>VW opened the Group's first pilot facility for recycling high-voltage vehicle batteries at the Salzgitter site at the start of 2021 (2024 AR, p. 334). The recycling process used in Salzgitter avoids energy-intensive melting in a blast furnace, where used battery systems are mechanically recycled (ground and dried) to yield "black powder," which contains lithium, nickel, manganese, and cobalt, and graphite (2023 Sustainability Report, p. 86).</p> <p>VW doesn't disclose the recovery rates that have been achieved so far.</p> <p>2023 Sustainability Report  <a href="https://www.volkswagen-group.com/en/publications/more/group-sustainability-report-2023-2674">https://www.volkswagen-group.com/en/publications/more/group-sustainability-report-2023-2674</a>            2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></p>	0.5
		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><b>25%:</b> 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><b>25%:</b> 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><b>50%:</b> the company provides quantitative information about the collection of batteries (i.e total numbers and / or percentages of batteries collected).</p>	<p>PowerCo and the Center of Excellence (CoE) Battery are responsible for end-of-life recycling (2024 AR, p. 158). VW states that "Batteries are only recycled in the pilot facility if they can no longer be used in other ways – for example, in reconditioned form in mobile energy storage systems such as flexible fast-charging stations or charging robots." (2023 Sustainability Report, p. 86). This indicates that there is a process for repurposing batteries, e.g., for energy storage systems. However, no additional details are disclosed.</p> <p>2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a>            2023 Sustainability Report  <a href="https://www.volkswagen-group.com/en/publications/more/group-sustainability-report-2023-2674">https://www.volkswagen-group.com/en/publications/more/group-sustainability-report-2023-2674</a></p>	0.25
		4.3.9. The company has established closed-loop processes in order to maximize the recycling of end-of-life EV batteries	1	<p><b>25%:</b> the company indicates that there is a closed-loop process in place for recycling batteries (that involves recovering raw materials).</p> <p><b>25%:</b> 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><b>50%:</b> 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><a href="#">VW opened the Group's first pilot facility for recycling high-voltage vehicle batteries at the Salzgitter site at the start of 2021 (2024 AR, p. 334). The recycling process used in Salzgitter avoids energy-intensive melting in a blast furnace, where used battery systems are mechanically recycled (ground and dried) to yield "black powder," which contains lithium, nickel, manganese, cobalt, and graphite. VW discloses that the Salzgitter facility "has been initially designed to recycle up to 3,600 battery systems per year in pilot operation" (2024 AR, p. 334), but does not disclose the achieved recovery rate at commercial scale.</a></p> <p>2024 Annual Report  <a href="https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL">https://annualreport2024.volkswagen-group.com/_assets/downloads/entire-vw-ar24.pdf?h=5AteXYgL</a></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)	Volkswagen Analysis	Volkswagen Points
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	Performance band: C (improved slightly from C- in previous year) <a href="https://lobbymap.org/company/Volkswagen-9e7f6038049cce3caa35490440a6a54b">https://lobbymap.org/company/Volkswagen-9e7f6038049cce3caa35490440a6a54b</a>	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.	VW analysis	Volkswagen 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><a href="#">The company commits to respect human rights in the Code of Conduct of the Volkswagen Group (CoC): “We confirm our commitment to major international agreements and declarations, in particular the International Bill of Human Rights and the core labor standards of the International Labour Organization (ILO). Our entrepreneurial activities follow the UN Guiding Principles on Business and Human Rights...” (p. 9).</a></p> <p>Volkswagen also has a “Declaration by the Volkswagen Group on social rights, industrial relations and business and human rights” (Declaration on Social Rights) in which the company also commits to the Universal Declaration of Human Rights, the International Covenant on Civil and Political, the International Covenant on Economic, Social and Cultural Rights, The ILO core labor standards, and the UN Guiding Principles on Business and Human Rights, among others (p. 4).</p> <p>The Code of Conduct of the Volkswagen Group  <a href="https://uploads.vw-mms.de/system/production/documents/cws/001/882/file_en/ff00b57247352dbd869e41213f6f2868e5fdcf65/20240930_Group_CoC_Brochure_EN_RGB_V3_1.pdf?1729088374">https://uploads.vw-mms.de/system/production/documents/cws/001/882/file_en/ff00b57247352dbd869e41213f6f2868e5fdcf65/20240930_Group_CoC_Brochure_EN_RGB_V3_1.pdf?1729088374</a></p> <p>Declaration on Social Rights  <a href="https://uploads.vw-mms.de/system/production/documents/cws/001/869/file_en/6c235b0fd042a089aa11a1ab2e4cb1b732e63cb/201209-sozialcharta_en.pdf?1685119131">https://uploads.vw-mms.de/system/production/documents/cws/001/869/file_en/6c235b0fd042a089aa11a1ab2e4cb1b732e63cb/201209-sozialcharta_en.pdf?1685119131</a></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><b>OR</b></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><b>PLUS</b></p> <p>50%: the company "requires" or otherwise mandates their suppliers to apply the requirements of the SCoC to their own suppliers.</p> <p><b>OR</b></p> <p>25%: the company "expects" or "encourages" their suppliers to apply these standards to their own suppliers.</p>	<p>The company's Code of Conduct for Business Partners (CoC BP) does not explicitly reference the company's Code of Conduct or Declaration on Social Rights. Its “sustainability requirements” include a long list of selected human rights, but does not include a clear and express requirement for suppliers to respect and/or uphold all human rights. The company only requires some suppliers to pass on their requirements to their own suppliers: “The business partners are required to contractually pass on all sustainability requirements to those business partners (especially suppliers) that affect the contractual relationship with the Volkswagen Group” (CoC BP, p. 6).</p> <p>Suppliers are otherwise expected “to ensure, to the extent possible and reasonable, that the sustainability requirements are passed on to their business partners in the supply chain” (p. 6).</p> <p>Code of Conduct for Business Partners (CoC BP)  <a href="https://www.vwgroupsupply.com/one-kbp-pub/media/shared_media/documents_1/nachhaltigkeit/brochure_volkswagen_group_requirements_regarding_sustainability_in_its_relationships_with_business_partners_code_of_conduct_fo/coc_geschaeftpartner_20230309~1.pdf">https://www.vwgroupsupply.com/one-kbp-pub/media/shared_media/documents_1/nachhaltigkeit/brochure_volkswagen_group_requirements_regarding_sustainability_in_its_relationships_with_business_partners_code_of_conduct_fo/coc_geschaeftpartner_20230309~1.pdf</a></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.	VW analysis	Volkswagen 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><b>25%:</b> the company states that there is a process in place for identifying salient human rights risks.</p> <p><b>25%:</b> the company explains its methodology for identifying risks (e.g. desktop review) and prioritising them.</p> <p><b>25%:</b> the company specifies how often they repeat this risk assessment.</p> <p><b>25%:</b> 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><a href="#">Volkswagen describes an impact materiality assessment in its Annual Report (AR)*. This is shaped by ESCR Requirements (AR, p. 249). Parameters of scale, scope, and irremediable character are used to determine severity. This in turn is used to determine the materiality of the impacts (AR, p. 252). The materiality assessment is updated annually (AR, p. 249). The company clarifies that in-house experts were used for the impact materiality assessment (p. 251), but does not state whether external human rights experts were involved. The company has also put in place a “Responsible Supply Chain System” (ReSC System) to identify and address supply chain human rights risks. The company provides a good level of detail about the process (from p. 395 of the AR). This is described in further detail below.</a></p> <p><a href="#">* Information coming from Volkswagen’s Annual Report under this and all other indicators in the Leaderboard is only referenced or minimally described. This is because Volkswagen’s Annual Report has been published as “read only” and, unlike other companies’ reports, relevant parts of the text cannot be copied and pasted here to provide additional explanation or substantiation.</a></p> <p><a href="#">Volkswagen Annual Report</a> <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299">https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299</a></p>	0.75
		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><b>25%:</b> the company names the generic, salient risks in their supply chain (e.g. conflict minerals, forced labour, water security, etc.).</p> <p><b>50%:</b> 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><b>100%:</b> 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><a href="#">Volkswagen describes the salient risks to workers’ rights in the supply chain, and indicates the relevant tier and, occasionally, the geographical location (AR, p. 254, 393, 401).</a></p> <p><a href="#">The company’s Responsible Raw Materials Report (RRMR) lists a larger number of risks, including risks to the rights of local communities and Indigenous Peoples (p. 15). This report also specifies the raw materials associated with the listed risks, and indicates the geographical location for some of them. The report provides additional description, such as the rightsholders particularly affected, the ways in which their rights are affected, challenges and mitigation measures (p. 27-66).</a></p> <p><a href="#">Volkswagen Annual Report</a> <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299">https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299</a></p> <p><a href="#">Responsible Raw Materials Report</a> <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></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.	VW analysis	Volkswagen points
		1.2.3. The company has a process for identifying high risk supplier categories in their supply chain.	1	<p><b>50%:</b> 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><b>25%:</b> 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><b>25%:</b> 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>Through the ReSC System, Volkswagen assesses risks associated with direct suppliers and, “depending on the situation and the risk”, indirect suppliers (AR, p. 395).</p> <p>The company describes the process for identifying high, medium, and low risk suppliers. Based on this classification, suppliers are assigned a package of preventive/mitigating measures: suppliers classified as high-risk must go through the S-Rating process. This involves a standardised self-assessment questionnaire (SAQ), and risk-based or ad-hoc audits (AR, p. 403-4). Suppliers with a high or medium risk are subject to media screening (AR, p. 402). The company also responds to risks by way of “deep dive measures” (p. 405).</p> <p>To support suppliers, Volkswagen offers sustainability training. This is offered on-site and online, and includes relevant due diligence training to enable suppliers to identify and address their own risks. It is offered to both existing and potential new suppliers (AR, p. 405).</p> <p>Volkswagen Annual Report  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299">https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299</a></p> <p>Responsible Raw Materials Report (RRMR)  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></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.	VW analysis	Volkswagen 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><b>25%:</b> 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><b>25%:</b> the company provides quantitative information of the number of potential new suppliers assessed, and the tier that they belong to.</p> <p><b>25%:</b> 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><b>25%:</b> this process extends beyond tier 1 to tier 2 at a minimum.</p>	<p>To be awarded a contract, potential new suppliers must acknowledge the sustainability requirements in the CoC BP (AR, p. 402). Potential new suppliers classified as high risk must undergo the company's S-Rating, including a SAQ. A or B results are eligible for contracts. Suppliers with a C result are not eligible (AR, p. 403).</p> <p>Volkswagen discloses that the number of direct suppliers who had completed the SAQ in 2024 was 19,094, and 20% of this were new suppliers (AR, p. 404). The company does not disclose the number or percentage of assessed potential new suppliers that did not meet the company's minimum requirements (the company does disclose that 28 suppliers were rated C, but it is not clear whether any of these were potential new suppliers).</p> <p>Indirect suppliers are also assessed "depending on the situation and the risk" (AR, p. 395). This may include indirect suppliers of high-risk raw materials. The company explains that to address risks lower down the supply chain, it has identified 18 high-risk raw materials. It has put in place a management system (RMDDMS) to identify and manage these risks (AR, p. 394).</p> <p>The company's CoC BP anticipates the need to assess suppliers beyond Tier 1: "The business partners take appropriate and adequate measures that give the Volkswagen Group the right to carry out similar assessments of their business partners if this is necessary for the fulfilment of legal obligations." (CoC BP, p. 40).</p> <p>Volkswagen Annual Report  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299">https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299</a></p> <p>Code of Conduct for Business Partners (CoC BP)  <a href="https://www.vwgroupsupply.com/one-kbp-pub/media/shared_media/documents_1/nachhaltigkeit/brochure__volkswagen_group_requirements_regarding_sustainability_in_its_relationships_with_business_partners__code_of_conduct_fo/coc_geschaeftpartner_20230309~1.pdf">https://www.vwgroupsupply.com/one-kbp-pub/media/shared_media/documents_1/nachhaltigkeit/brochure__volkswagen_group_requirements_regarding_sustainability_in_its_relationships_with_business_partners__code_of_conduct_fo/coc_geschaeftpartner_20230309~1.pdf</a></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.	VW analysis	Volkswagen points
		1.3.2. The company discloses how it monitors suppliers for compliance with the SCoC during the contract period.	2	<p><b>20%:</b> the company indicates that there is a process in place to monitor compliance.</p> <p><b>20%:</b> the company provides details on the process (e.g. tools, technologies and sources of information they use).</p> <p><b>20%:</b> 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><b>20%:</b> 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><b>20%:</b> the company provides quantitative information on non-conformances found, <b>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.</b></p> <p><b>OR</b></p> <p><b>10%:</b> 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 (<b>this can refer to the company as a whole, or to the total number of suppliers within a relevant category</b>). 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>Volkswagen specifies that it might verify compliance by suppliers “by means of a risk assessment of the relevant business partner’s area of responsibility, a self-assessment by the business partner and/or by deploying experts locally (on-site assessment)” (CoC BP, p. 40).</p> <p>Compliance with the CoC BP is also monitored through media screening, reports through the Whistleblower system, audits, and the Supply Chain Grievance Mechanism (AR, p. 403). In-depth social standard audits are also used (p. 405).</p> <p>The company discloses that, in 2024, more than 39,500 direct suppliers were part of the continuous media screenings, amounting to 89% of the total procurement volume in the reporting year (AR, p. 403). In addition, 19,094 direct suppliers completed the company’s SAQ (p. 404). The company also discloses that a total of 85 audits were conducted in 2024 in connection with the S rating (p. 404). As the company discloses elsewhere that it has a total of 63,000 suppliers, it is possible to calculate the percentage of suppliers both assessed through the SAQ and audited. However, in relation to audited suppliers, the company does not specify the tier.</p> <p>The company discloses that, by the end of the reporting year, only 28 suppliers of a total of 14,709 assessed were rated “C”. However, the company does not provide information about the type, severity, or the location of the non-conformances found.</p> <p>The Code of Conduct of the Volkswagen Group  <a href="https://uploads.vw-mms.de/system/production/documents/cws/001/882/file_en/ff00b57247352dbd869e41213f6f2868e5fdcf65/20240930_Group_CoC_Brochure_EN_RGB_V3_1.pdf?1729088374">https://uploads.vw-mms.de/system/production/documents/cws/001/882/file_en/ff00b57247352dbd869e41213f6f2868e5fdcf65/20240930_Group_CoC_Brochure_EN_RGB_V3_1.pdf?1729088374</a></p> <p>Volkswagen Annual Report  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299">https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299</a></p>	1.4

**Company analysis - human rights & responsible sourcing**

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	VW analysis	Volkswagen 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, <b>or potential contractual relationship</b>, between suppliers and the auto-manufacturer. It applies to all tiers to the point of extraction where there is, <b>or there might be</b>, a direct relationship between the auto manufacturer and the supplier.</p> <p><b>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.).</b></p> <p><b>33%: the company discloses specific actions it will take in response to findings of non-conformance by existing suppliers.</b></p> <p><b>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.</b></p> <p>Note: this is distinct from providing remedy to impacted stakeholders.</p>	<p>Findings of non-compliance during pre-contractual assessments may be followed by “a risk assessment of the relevant business partner’s area of responsibility, a self-assessment by the business partner and/or by deploying experts locally (on-site assessment)” Resulting measures, if any, become binding as part of the contract, and the supplier is required to remedy any violations or risk of violations within its own business or in its supply chain within a reasonable period of time (CoC BP, p. 40).</p> <p>The company also outlines its response to breaches by existing suppliers. This might lead to Volkswagen taking “prompt and appropriate measures to prevent, stop or minimise the extent of such violation.” ... “The business partner is obligated in this case to take all appropriate measures to prevent, stop or minimise the extent of such violation”. Supplier training is also envisaged. “If the nature of the violation is such that it cannot be terminated in the foreseeable future, the business partner prepares and implements a plan (including a specific schedule) to stop or minimise the violation without undue delay. If required by law, the Volkswagen Group shall be appropriately involved in the preparation of the plan.” (CoC BP, p. 42).</p> <p>Volkswagen might also consider “Requesting implementation of improvement measures; verifying highlighted improvements/measures; excluding the business partner from new orders and; terminating the contract”. (CoC BP, p. 44).</p> <p>Volkswagen’ AR also describes their responses to findings of non-conformance. If sustainability risks or breaches are identified through on-site screenings, the supplier is given “improvement measures” or, in more serious cases, an “action plan” (AR, p. 397, 404-5). Depending on the measure, the supplier must implement the plan within the next six months at the latest (p. 404). Evidence of the implementation of the agreed actions is needed to obtain a positive S-rating and be eligible for the award of contracts (p. 400).</p> <p>Volkswagen does not disclose the number of corrective action plans issued during the year. The company states that “in the reporting year, where necessary, actions were initiated at supplier level”. The company also discloses that 28 audits led to C-ratings (AR, p. 404). However, none of this indicates how many improvement measures or corrective action plans were actually drawn or agreed upon with suppliers during the reporting year.</p> <p>The Code of Conduct of the Volkswagen Group  <a href="https://uploads.vw-mms.de/system/production/documents/cws/001/882/file_en/ff00b57247352dbd869e41213f6f2868e5fdcf65/20240930_Group_CoC_Brochure_EN_RGB_V3_1.pdf?1729088374">https://uploads.vw-mms.de/system/production/documents/cws/001/882/file_en/ff00b57247352dbd869e41213f6f2868e5fdcf65/20240930_Group_CoC_Brochure_EN_RGB_V3_1.pdf?1729088374</a></p> <p>Volkswagen Annual Report  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299">https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299</a></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.	VW analysis	Volkswagen 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><b>100%:</b> the company discloses the types of actions that it undertakes across its whole supply chain to verify whether corrective actions have occurred.</p> <p><b>25%:</b> 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>Suppliers subject to corrective action must provide evidence to auditors that the action has been taken (AR, p. 405). The effectiveness of actions taken is verified through new desktop reviews or re-audits by internal case handlers or auditors (p. 404). The company's RRMR also states that "follow-up audits can be conducted to verify the effectiveness of the measures implemented" (p. 11).</p> <p>Volkswagen Annual Report  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299">https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299</a></p> <p>Responsible Raw Materials Report (RRMR)  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></p>	1
	<b>1.4. Remedy</b>	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><b>10%:</b> if the company only has an in-house mechanism</p> <p><b>20%:</b> 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><b>20%:</b> The mechanism is available to its workers, suppliers, suppliers' workers (in any tier) and other external stakeholders (e.g. whistleblower hotline).</p> <p><b>50%:</b> 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><a href="#">The company has put in place a Group-wide Whistleblower system. This is administered by the company, so is not independent. It is available to all employees, suppliers, suppliers' workforce and any other third parties (AR, p. 368).</a></p> <p><a href="#">The company also operates a Supply Chain Grievance Mechanism (SCGM) through the same Whistleblower channel. This is designed specifically for value chain workers, nearby communities, and all other potentially affected stakeholders (AR, p. 399).</a></p> <p><a href="#">The company does not explain how the existence of the Whistleblower system or Supply Chain Grievance Mechanism is communicated to its suppliers' workers and other impacted stakeholders. The company recognises that, "at the present time, there are no actions aimed at analysing whether workers in the value chain are aware of and trust the structures and processes of the SCGM." (AR, p. 401).</a></p> <p>Volkswagen Annual Report  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299">https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299</a></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.	VW analysis	Volkswagen 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><b>25%:</b> The company provides quantitative information about the total number of grievances raised during the reporting year.</p> <p><b>25%:</b> 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><b>25%:</b> 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><b>25%:</b> The company provides information about the total number of ongoing supply chain grievances.</p>	<p>Volkswagen discloses that 3,555 reports were received through the investigation offices in the reporting year (AR, p. 390), and that 213 supply chain grievances were received (AR, p. 403).</p> <p>The company does not disclose disaggregated information regarding supply chain grievances. This is an important regression from last year, when the company provided a breakdown of supply chain grievances by type, tier, and geographical location, and disclosed the outcome of some of them.</p> <p>Volkswagen Annual Report  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299">https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299</a></p>	0.25
		1.4.4. The company has put in place a remedy process for its supply chain.	2	<p><b>25%:</b> the company describes how they investigate an issue that is raised and escalate the issue within the company</p> <p><b>25%:</b> the company indicates how they determine appropriate remedy</p> <p><b>25%:</b> the company indicates whether the affected rightsholders are involved in the determination of remedy and how</p> <p><b>25%:</b> 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><a href="#">The company's "Rules of Procedure for the Volkswagen Group Complaints Procedure" explain the investigation process, as well as the process for determining remedial measures (p. 7). The Rules do not indicate whether/how whistleblowers or complainants are involved in the determination of remedy. The company's Supply Chain Grievance Mechanism is a key channel for identifying supply chain grievances and defining remedial action (AR, p. 397, 400).</a></p> <p><a href="#">VW does not disclose information about the number of confirmed human rights grievances in its supply chain that resulted in measures of reparation</a></p> <p><a href="#">Rules of Procedure for the Volkswagen Group Complaints Procedure</a>  <a href="https://www.volkswagen-group.com/de/publikationen/weitere/rules-of-procedure-for-the-volkswagen-group-complaints-procedure-2007">https://www.volkswagen-group.com/de/publikationen/weitere/rules-of-procedure-for-the-volkswagen-group-complaints-procedure-2007</a></p> <p><a href="#">Volkswagen Annual Report</a>  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299">https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299</a></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.	VW analysis	Volkswagen 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><b>100%:</b> 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><b>75%:</b> 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><b>50%:</b> 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>The company now has a "Responsible Raw Materials Policy" which applies, "but is not limited to", "metals and minerals, agricultural raw materials and battery raw materials, such as lithium, nickel, cobalt and natural graphite" (Preamble).</p> <p>Responsible Raw Materials Policy  <a href="https://uploads.vw-mms.de/system/production/documents/cws/001/886/file_en/dab43f57ac969f9b36df0790d6b477e690cfcfb7/Volkswagen_Group_Responsible_Raw_Material_Policy.pdf?1732027929">https://uploads.vw-mms.de/system/production/documents/cws/001/886/file_en/dab43f57ac969f9b36df0790d6b477e690cfcfb7/Volkswagen_Group_Responsible_Raw_Material_Policy.pdf?1732027929</a></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.	VW analysis	Volkswagen points
		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><b>50%: Implementation of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs:</b></p> <ul style="list-style-type: none"> <li>- <b>50%:</b> 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.</li> </ul> <p><b>OR</b></p> <ul style="list-style-type: none"> <li>- <b>25%:</b> 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.</li> </ul> <p><b>OR</b></p> <ul style="list-style-type: none"> <li>- <b>10%:</b> 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.</li> </ul> <p><b>50%: Implementation of Due Diligence:</b></p> <ul style="list-style-type: none"> <li>- <b>25%:</b> 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).</li> <li>- <b>25%:</b> the company requires suppliers to disclose smelter/refiner information.</li> </ul>	<p><a href="#">The company's CoC BP requires suppliers to undertake due diligence in accordance with the OECD Due Diligence Guidance only in relation to the 3TG from CAHRAs.: "comply in particular with their due diligence obligations as described in the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" regarding relevant raw materials (CoC BP, p. 38). Specifically, suppliers are required to only use tin, tungsten, tantalum and gold from smelters or refineries that meet the requirements of the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" as assessed by the Responsible Mineral Initiative (RMI) or similar organisations (CoC BP, p. 16).</a></p> <p><a href="#">The company requires suppliers to have due diligence processes in place, and to disclose SoR: The CoC BP requires suppliers to "disclose information on their supply chains to the Volkswagen Group", to "impose a corresponding disclosure obligation on their suppliers, which they in turn are required to pass on to their suppliers." "This may require in particular that business partners disclose their supply chain to the Volkswagen Group up to the material origin (including choke points like smelters and refiners) and provide evidence of management systems or third-party verifications demonstrating processes that prevent or mitigate sustainability risks in the supply chain." (CoC BP, p. 38).</a></p> <p><a href="#">Code of Conduct for Business Partners (CoC BP)</a> <a href="https://www.vwgroupsupply.com/one-kbp-pub/media/shared_media/documents_1/nachhaltigkeit/brochure_volkswagen_group_requirements_regarding_sustainability_in_its_relationships_with_business_partners_code_of_conduct_fo/coc_geschaeftpartner_20230309~1.pdf">https://www.vwgroupsupply.com/one-kbp-pub/media/shared_media/documents_1/nachhaltigkeit/brochure_volkswagen_group_requirements_regarding_sustainability_in_its_relationships_with_business_partners_code_of_conduct_fo/coc_geschaeftpartner_20230309~1.pdf</a></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.	VW analysis	Volkswagen 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><b>25%:</b> the company discloses that they have a process in place to map transition minerals supply chains back to the point of extraction.</p> <p><b>25%:</b> 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><b>25%:</b> 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><b>25%:</b> 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 &amp; lithium. Companies that map two of fewer minerals will receive half scores.</p>	<p><a href="#">Volkswagen seeks to map all battery raw materials' supply chains to the point of extraction (AR, p. 407). Battery suppliers are required to disclose their entire upstream supply chain before they are awarded new contracts (p. 157).</a></p> <p><a href="#">The company's RRMR describes their mapping efforts in more detail. Regarding the battery supply chain, the company states that they are "continuing to collect supply chain data and progress with our supply chain mapping and auditing program" and that they "conduct supply chain audits across all levels of our lithium, cobalt, nickel and natural graphite supply chains" (p. 25).</a></p> <p><a href="#">The company is also participating in mapping efforts through the RMI's Emerging Minerals Working Group (p. 19). The company also offers some detail about their mapping efforts to the point of extraction in relation to specific raw materials, e.g. for lithium (p. 29), graphite (p. 36), mica (p. 55), and PGM (p. 61).</a></p> <p><a href="#">Volkswagen discloses some detail from its mapping (e.g., where the greatest risks lie and countries of origin).</a></p> <p><a href="https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299">Volkswagen Annual Report https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299</a></p> <p><a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">Responsible Raw Materials Report (RRMR) https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></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.	VW analysis	Volkswagen 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><b>25%:</b> 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><b>25%:</b> the company discloses whether they source conflict minerals from CAHRAs, as well as the relevant transition minerals and countries of origin involved.</p> <p><b>50%:</b> 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><a href="#">Volkswagen discloses the risks of sourcing conflict minerals from CAHRAs, and provides a list of the countries and origin of conflict minerals in its supply chain (Annex IV, RRRM).</a></p> <p><a href="#">The company specifically discusses its sourcing of cobalt from the DRC and Indonesia (two CAHRAs) (RRMR, p. 31). The company describes the risks associated with conflict minerals from CAHRAs in general (RRMR, p. 38), but not in relation to the specific CAHRAs the 3TG in their products come from.</a></p> <p><a href="#">Responsible Raw Materials Report (RRMR)</a>  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></p>	0.5
		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><b>100%:</b> 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><b>50%:</b> 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><b>25%:</b> 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>Volkswagen discloses broader risks from transition minerals in their supply chain, including relevant tier and geographical location for lithium, nickel, cobalt, as well as graphite, aluminium, PGM, REE, and mica (RRMR).</p> <p>Responsible Raw Materials Report (RRMR)  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></p>	1
		2.2.4. The company publishes a list of smelters or refiners (SoR) in its supply chain	1	<p><b>100%:</b> the company publishes a complete list of smelters/refiners in their supply chain for at least 3TG minerals.</p> <p><b>50%:</b> 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>	<p><a href="#">Volkswagen publishes a list of 3TG smelters and the countries and territories of origin they have identified in Annexes III and IV of the RRRM.</a></p> <p><a href="#">Responsible Raw Materials Report (RRMR)</a>  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></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.	VW analysis	Volkswagen 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><b>100%:</b> the company discloses information on RMI conformance for all of the SoRs identified in their supply chain.</p> <p><b>50%:</b> 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>	<p><a href="#">Volkswagen discloses that “of the smelters identified in our supply chain, nearly 61% were RMAP-conformant at the end of 2024”.</a></p> <p><a href="#">The company clarifies that “the slight decrease in RMAP conformance compared to the previous reporting year is due to a reduced number of globally available conformant smelters” (RRMR, p. 40).</a></p> <p><a href="#">Responsible Raw Materials Report (RRMR)</a> <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></p>	0.2
	<b>2.3. Prevent, Mitigate and Account</b>	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	1.4
		2.3.2. The company formally engages SoRs to build their capacity to conduct due diligence of their own supply chains.	2	<p><b>25%:</b> 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><b>25%:</b> the company specifies that it engages directly with SoRs to build their capacity to conduct due diligence.</p> <p><b>50%:</b> the company provides detail on how it engages with SoRs to build their capacity</p>	<p>Volkswagen is a member of the RMI (RRMR, p. 19).</p> <p>The company engages with SoR through its membership in RMI’s Smelter Engagement Team and the Gold Team, but does not appear to engage independently of these joint efforts (p. 40).</p> <p><a href="#">Responsible Raw Materials Report (RRMR)</a> <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></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.	VW analysis	Volkswagen points
		2.3.3. The company formally engages extractives companies and includes human rights clauses in any contractual arrangements.	2	<p><b>50%:</b> 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><b>50%:</b> 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>Volkswagen announces that, from 2025, it will start sourcing battery raw materials directly to supply its battery cell producer PowerCo (RRMR, p. 24). The company also states that in the reporting period, PowerCo entered purchasing agreements with suppliers of battery raw materials that will begin supplying PowerCo in the coming years (p. 26).</p> <p>These direct suppliers are subject to human rights requirements: “In preparation for the start of battery cell production, the Sustainable Supply Chain team of the Volkswagen Group is supporting PowerCo in assessing the social and environmental risks of potential direct suppliers of battery raw materials. During the reporting period, we performed desktop due diligence ESG pre-checks with a focus on mine sites for all battery raw materials as a standard process during the initial dialogue with potential suppliers. In high-risk contexts, during contract negotiations, we also performed comprehensive on site due diligence facilitated by industry expert consultants. These assessments cover extensive human rights and environmental aspects in accordance with applicable legislation and international due diligence standards” (RRMR, p. 26).</p> <p>Responsible Raw Materials Report (RRMR)  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></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.	VW analysis	Volkswagen 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><b>25%:</b> The company is a member of IRMA.</p> <p><b>50%:</b> The company actively engages extractive companies within its supply chain regarding auditing by IRMA.</p> <p><b>25%:</b> 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>Volkswagen is a member of IRMA, actively engages extractive companies regarding IRMA auditing, and has established requirements on suppliers in this respect.</p> <p>“The Volkswagen Group has committed to progressively applying the IRMA Standard for Responsible Mining in its battery supply chains, ensuring that, in high-risk regions, the sourcing of battery raw materials is restricted to material originating from mines that are audited according to the IRMA Standard” (RRMR, p. 19).</p> <p>The company will begin its own battery cell production through PowerCo in 2025. In preparation for this, the company explains that it has begun engaging with potential direct suppliers of battery raw materials, and that “in high-risk countries, we strive to ensure that our raw material suppliers only use lithium, cobalt, nickel and natural graphite from IRMA assessed mines. Following a supplier’s commitment to obtaining IRMA assessment, we continuously monitor their progress and remain closely involved.”</p> <p>“We also seek a contractual commitment to continuous improvement in order to increase the IRMA performance level over time” (RRMR, p. 26).</p> <p>The company also states that an IRMA audit is one of the contractual requirements for the mine sites of directly procured PGM (p. 62).</p> <p>Responsible Raw Materials Report (RRMR)  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></p>	1.6

## Company analysis - human rights & responsible sourcing

Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	VW analysis	Volkswagen points
		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	See general HR indicators	See general HR indicators	1
		2.3.6. The company discloses how they verify the implementation of corrective actions.	1	See general HR indicators	See general HR indicators.	1
	<b>2.4. Remedy</b>	2.4.1. The company has put in place a formal mechanism whereby grievances can be raised about SoR facilities.	1	<p><b>50%:</b> 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><b>50%:</b> the company discloses how they review and investigate grievances raised through this mechanism.</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.	VW analysis	Volkswagen points
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	<b>100%:</b> 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 does not have an explicit commitment to the UNDRIP in their Code of Conduct or any other formal document, and it does not have a standalone Indigenous Peoples' rights policy. The company has now published a new Responsible Raw Materials Policy which mentions the UNDRIP, but does not express an explicit commitment to it. In fact, in its list of international instruments it commits to respect, the company omits UNDRIP (section entitled "Our Commitment").</p> <p>Responsible Raw Materials Policy  <a href="https://uploads.vw-mms.de/system/production/documents/cws/001/886/file_en/dab43f57ac969f9b36df0790d6b477e690cfcfb7/Volkswagen_Group_Responsible_Raw_Material_Policy.pdf?1732027929">https://uploads.vw-mms.de/system/production/documents/cws/001/886/file_en/dab43f57ac969f9b36df0790d6b477e690cfcfb7/Volkswagen_Group_Responsible_Raw_Material_Policy.pdf?1732027929</a></p>	0
		3.1.2. The company has a public commitment to FPIC.	1	<p><b>100%:</b> 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><b>50%:</b> 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>	<p>Volkswagen's new Responsible Raw Materials Policy includes an explicit commitment to FPIC: "We do not accept threats to indigenous peoples' rights and communities. We support the ability of Indigenous Peoples and local communities (IPLCs) to give or withhold their free, prior, and informed consent (FPIC) on any activities that might affect their rights and respect formal and customary land rights of IPLCs in accordance with the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) (Section on "Human Rights and Working Conditions", para 7).</p> <p>Responsible Raw Materials Policy  <a href="https://uploads.vw-mms.de/system/production/documents/cws/001/886/file_en/dab43f57ac969f9b36df0790d6b477e690cfcfb7/Volkswagen_Group_Responsible_Raw_Material_Policy.pdf?1732027929">https://uploads.vw-mms.de/system/production/documents/cws/001/886/file_en/dab43f57ac969f9b36df0790d6b477e690cfcfb7/Volkswagen_Group_Responsible_Raw_Material_Policy.pdf?1732027929</a></p>	1
		3.1.3. The company requires its tier 1 suppliers to respect Indigenous Peoples' rights	2	<p>The SCoC, responsible sourcing policy or equivalent explicitly requires suppliers to respect the UNDRIP (<b>50%</b>) and FPIC (<b>50%</b>).</p> <p>MODIFIER: Points will be halved if the policy is qualified.</p>	<p>Under a sub-heading "Minorities, vulnerable groups and indigenous people", the company's CoC BP requires suppliers to "respect the rights of minorities, vulnerable groups and local communities to decent living conditions." (p. 32) However, this neither references nor requires FPIC nor respect for UNDRIP.</p> <p>Code of Conduct for Business Partners (CoC BP)  <a href="https://www.vwgroupsupply.com/one-kbp-pub/media/shared_media/documents_1/nachhaltigkeit/brochure__volkswagen_group_requirements_regarding_sustainability_in_its_relationships_with_business_partners__code_of_conduct_fo/coc_geschaeftpartner_20230309~1.pdf">https://www.vwgroupsupply.com/one-kbp-pub/media/shared_media/documents_1/nachhaltigkeit/brochure__volkswagen_group_requirements_regarding_sustainability_in_its_relationships_with_business_partners__code_of_conduct_fo/coc_geschaeftpartner_20230309~1.pdf</a></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.	VW analysis	Volkswagen points
		3.1.5. These commitments are translated into the languages used by the impacted Indigenous Peoples.	1	<p><b>50%:</b> the company requires suppliers to translate these commitments to the languages of the impacted Indigenous Peoples.</p> <p><b>50%:</b> the company requires that these translations are actively made available to the Indigenous Peoples concerned.</p>	Not disclosed	0
	<b>3.2. Identify</b>	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	<p><b>25%:</b> 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.</p> <p><b>25%:</b> the company discloses where in the supply chain these risks occur (e.g. materials, tiers, and geographical location).</p> <p><b>25%:</b> the company explains how Indigenous Peoples are involved in the risk identification process.</p> <p><b>25%:</b> the company provides case studies of this process in practice. <b>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.</b></p>	<p>Volkswagen's risk identification process systematically includes FPIC and other Indigenous Peoples' rights issues through to the point of extraction. Risks to Indigenous Peoples' rights are listed as salient risks in the company's raw material supply chains (RRMR, p. 15). Raw materials are assessed against this risk. Risks to Indigenous Peoples' rights have been identified in relation to the company's lithium, nickel, 3TG, aluminium, copper, magnesium, and steel supply chains (raw material profiles in the RRMR, p. 27-66). The company indicates that these risks all occur at mining level, although geographical location is disclosed for only some of the assessed raw materials (e.g. Chile, Australia, and Zimbabwe regarding lithium, Indonesia and Canada regarding nickel, Guinea regarding aluminium, etc.).</p> <p>Volkswagen does not explain how Indigenous Peoples are involved in the risk identification process, and does not provide any examples or case studies to demonstrate this in practice.</p> <p>Responsible Raw Materials Report (RRMR)  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></p>	0.5
	<b>3.3. Prevent, Mitigate and Account</b>	3.3.1. The company provides additional discussion regarding the practices by which suppliers must obtain FPIC	1	<p><b>100%:</b> 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><b>25%:</b> the company states a minimum expectation for suppliers and/or the process it describes is limited in its application.</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.	VW analysis	Volkswagen points
		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.	1.6
		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><b>25%:</b> the company formally engages extractive companies regarding FPIC.</p> <p><b>25%:</b> the company states that they formally review company documents (e.g. meeting minutes) to ensure that Indigenous Peoples' FPIC has been provided.</p> <p><b>50%:</b> 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><a href="#">While Volkswagen provides a number of examples of engagement with extractive companies on various human rights issues, including Indigenous Peoples' rights, it does not discuss engagement in relation to FPIC.</a></p> <p><a href="#">The company does not describe any actions it takes or might take to ensure FPIC in practice, and does not provide any examples or case studies in this context.</a></p> <p><a href="#">Responsible Raw Materials Report 2024</a> <a href="https://www.volkswagen-group.com/en/publications/more/responsible-raw-materials-report-2024-2986">https://www.volkswagen-group.com/en/publications/more/responsible-raw-materials-report-2024-2986</a></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.	VW analysis	Volkswagen 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><b>25%:</b> the company discloses the action it will take if disagreements or disputes with Indigenous Peoples arise in its supply chain.</p> <p><b>25%:</b> the company discloses the action it will take if it finds FPIC breaches in its supply chain.</p> <p><b>50%:</b> 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>	Not disclosed	0
	<b>3.4. Remedy</b>	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><b>25%:</b> the company explains how it involves Indigenous Peoples in the design of its grievance mechanisms and/or processes to address their complaints.</p> <p><b>25%:</b> the company explains how it involves Indigenous Peoples in the investigation of grievances and determination of remedy.</p> <p><b>50%:</b> the company provides examples or case studies of remedy provided to Indigenous Peoples for confirmed breaches of FPIC in the supply chain.</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.	VW analysis	Volkswagen points
4. Respect for Workers' Rights	4.1. Commit	4.1.1. The company has a commitment to workers' rights	1	<p><b>25%:</b> 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><b>OR</b></p> <p><b>50%:</b> 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"> <li>1. freedom of association and the effective recognition of the right to collective bargaining;</li> <li>2. the elimination of all forms of forced or compulsory labour;</li> <li>3. the effective abolition of child labour;</li> <li>4. the elimination of discrimination in respect of employment and occupation; and</li> <li>5. a safe and healthy working environment.</li> </ol> <p><b>PLUS</b></p> <p><b>25%:</b> the company has a commitment to a living wage in their human rights policy or in another formal policy document.</p> <p><b>25%:</b> the company outlines how it calculates a living wage.</p>	<p>The company includes a commitment to “the core labor standards of the International Labour Organization (ILO)” in its Code of Conduct (p. 9). It repeats this commitment in its Declaration on Social Rights (p. 4). The company includes an express commitment to the five fundamental principles in its Declaration on Social Rights (p. 6-7).</p> <p>The company does not expressly commit to a living wage. It commits to compensation that accords “at least to the legally valid and guaranteed national minimum.” It states that in cases where “legal or collective bargaining regulations do not exist, branch-specific tariff compensation and benefits are used as an orientation that are customary to the respective location and ensure an appropriate standard of living for the employees and their families” (Declaration on Social Rights, p. 7).</p> <p>The company’ new Responsible Raw Materials Policy states that they “promote working conditions that are adequate to cover the basic needs of workers and their families (living wage), which includes respecting minimum wages, overtime compensation, medical leave and government mandated benefits.” (Section on “Human Rights and Working Conditions”, para 9). While mentioning a living wage, this does not amount to a commitment to a living wage (noting also the reference to promoting, as against committing to, ensuring or requiring).</p> <p>Volkswagen outlines how they calculate a living wage in its AR, by reference to the Wage Indicator Foundation’s Living Wage Database (p. 382). While this is considered for purposes of awarding points, it is noted that the reference is slightly confusing without an underlying clear commitment to paying a living wage.</p> <p>The Code of Conduct of the Volkswagen Group  <a href="https://uploads.vw-mms.de/system/production/documents/cws/001/882/file_en/ff00b57247352dbd869e41213f6f2868e5fdcf65/20240930_Group_CoC_Brochure_EN_RGB_V3_1.pdf?1729088374">https://uploads.vw-mms.de/system/production/documents/cws/001/882/file_en/ff00b57247352dbd869e41213f6f2868e5fdcf65/20240930_Group_CoC_Brochure_EN_RGB_V3_1.pdf?1729088374</a></p> <p>Declaration on Social Rights  <a href="https://uploads.vw-mms.de/system/production/documents/cws/001/869/file_en/6c235b0fd042a089aa11a1ab2e4cb c1b732e63cb/201209-sozialcharta_en.pdf?1685119131">https://uploads.vw-mms.de/system/production/documents/cws/001/869/file_en/6c235b0fd042a089aa11a1ab2e4cb c1b732e63cb/201209-sozialcharta_en.pdf?1685119131</a></p> <p>Responsible Raw Materials Policy  <a href="https://uploads.vw-mms.de/system/production/documents/cws/001/886/file_en/dab43f57ac969f9b36df0790d6b477e690cfcfb7/Volkswagen_Group_Responsible_Raw_Material_Policy.pdf?1732027929">https://uploads.vw-mms.de/system/production/documents/cws/001/886/file_en/dab43f57ac969f9b36df0790d6b477e690cfcfb7/Volkswagen_Group_Responsible_Raw_Material_Policy.pdf?1732027929</a></p> <p>Volkswagen Annual Report  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299">https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299</a></p>	0.75

Company analysis - human rights & responsible sourcing						
Sub-section	Indicator Category	Indicators	Total Number of Points	Score Attribution Note: scores are cumulative unless otherwise specified.	VW analysis	Volkswagen points
		<p>4.1.2. The company extends their workers' rights commitments to their Tier 1 suppliers and beyond.</p> <p>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.</p>	2	<p><b>25%:</b> 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><b>OR</b></p> <p><b>50%:</b> 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"> <li>1. freedom of association and the effective recognition of the right to collective bargaining;</li> <li>2. the elimination of all forms of forced or compulsory labour;</li> <li>3. the effective abolition of child labour;</li> <li>4. the elimination of discrimination in respect of employment and occupation; and</li> <li>5. a safe and healthy working environment.</li> </ol> <p><b>PLUS</b></p> <p><b>25%:</b> the SCoC requires suppliers to pay a living wage.</p> <p><b>25%:</b> the SCoC prohibits the payment of recruitment fees.</p>	<p>Volkswagen's suppliers "are required to comply with the conventions of the International Labour Organization (ILO) as amended from time to time, in particular the fundamental rights at work" (CoC BP, p. 21).</p> <p>The requirements expressly include respect for the five fundamental principles and rights at work (p. 21-29).</p> <p>The company does not require suppliers to pay a living wage. It requires them to "pay their employees a reasonable wage", which is defined as "at least the minimum wage established under the applicable law and is otherwise measured according to the law of the place of employment." While the company then states that wages should cover the basic needs of employees and enable a decent standard of living for them and their families, it also expressly states "as far as possible", severely qualifying the requirement (p. 23).</p> <p>The company requires suppliers to not "ask employees to pay recruitment fees or inappropriate transportation fees" (p. 22).</p> <p>Code of Conduct for Business Partners (CoC BP)  <a href="https://www.vwgroupsupply.com/one-kbp-pub/media/shared_media/documents_1/nachhaltigkeit/brochure__volkswagen_group_requirements_regarding_sustainability_in_its_relationships_with_business_partners__code_of_conduct_fo/coc_geschaeftpartner_20230309~1.pdf">https://www.vwgroupsupply.com/one-kbp-pub/media/shared_media/documents_1/nachhaltigkeit/brochure__volkswagen_group_requirements_regarding_sustainability_in_its_relationships_with_business_partners__code_of_conduct_fo/coc_geschaeftpartner_20230309~1.pdf</a></p>	1.5
	<b>4.2. Identify</b>	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>Volkswagen describes a number of ways through which trade unions and/or workers' representatives in the supply chain are consulted on risks to workers' rights. The company explains that, through their participation in MSI and local projects, the company meets with value chain workers' representatives such as trade unions to discuss due diligence standards and working conditions (AR, p. 398).</p> <p>Volkswagen Annual Report  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299">https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299</a></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.	VW analysis	Volkswagen points
		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><b>100%:</b> 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><b>25%:</b> the company's risk assessment explicitly identifies workers' rights risks for at least one material / supply chain and the location/s.</p>	<p><a href="#">Volkswagen's risk assessment identifies the salient risks to workers' rights in the supply chain. These are listed in the company's AR, with an indication of the relevant tier and, occasionally, the geographical location (AR, p. 254, 393, 401).</a></p> <p><a href="#">The company's RRMR provides greater detail, indicating the specific raw material supply chains where the risks to labour rights occur, and the geographical location in relation to some of them (p. 27-66).</a></p> <p><a href="#">Volkswagen Annual Report</a>  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299">https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299</a></p> <p><a href="#">Responsible Raw Materials Report (RRMR)</a>  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339">https://uploads.vw-mms.de/system/production/documents/cws/002/986/file_en/b9c9f6c0342cbfa6435f770bd41745aa979edafb/VW_RRMR_24_gesamt_offen.pdf?1743501339</a></p>	1
	<b>4.3. Prevent, Mitigate and Account</b>	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	<p><b>25%:</b> the company has a collective agreement with the relevant trade union in the headquartered country.</p> <p><b>25%:</b> the company has a global framework agreement with IndustriALL for neutrality across all its operations.</p> <p><b>25%:</b> 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><b>25%:</b> IndustriALL was actively involved in the formulation of the company's workers' rights principles and/or policies.</p>	<p>The company discloses that a total of 92% of the Volkswagen Group's employees are covered by collective bargaining agreements (AR, p. 381). This does not indicate whether the company has a collective agreement with the relevant trade union in the headquartered country, but the company did confirm this in last year's reporting, which will be counted for scoring this year.</p> <p>The company had a GUF with IndustriALL, but this was suspended in 2019. The company does not state whether IndustriAll was involved in the formulation of its 2020 Declaration on Social Rights.</p> <p>Volkswagen has a number of established mechanisms to consult with trade unions and workers' representatives on workers' rights policies and principles. This includes the Group European Works Council and Group Global Works Council. These bodies were involved in the negotiation of the company's "Declaration on Social Rights", they meet regularly with management, and they negotiate and establish charters on different labour rights issues. Workers are also represented in the company's Supervisory Board (AR, p. 366).</p> <p><a href="#">Volkswagen Annual Report</a>  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299">https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299</a></p> <p><a href="#">IndustriALL</a>  <a href="https://www.industriall-union.org/industriall-suspends-global-agreement-with-volkswagen">https://www.industriall-union.org/industriall-suspends-global-agreement-with-volkswagen</a></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.	VW analysis	Volkswagen 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><b>50%: the company specifies that it works with the relevant trade union and/or workers' representatives in the elaboration of corrective action plans.</b></p> <p><b>50%: the company specifies that it works with the relevant trade union and/or workers' representatives in the verification of corrective action plan implementation.</b></p>	<p>Volkswagen explains that workers' views are sought during audit, and adds that these interviews can directly impact the contents of corrective action plans (AR, p. 399). However, the company does not mention trade unions and/or workers' representatives (only workers). In any case, the company does not positively state that workers actively participate in the elaboration of corrective action plans. The company does not indicate whether trade unions and/or workers' representatives have any role in the verification of corrective action plans.</p> <p>Volkswagen Annual Report  <a href="https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299">https://uploads.vw-mms.de/system/production/documents/cws/002/940/file_en/dfed3f8c2cd2a5f5616e3371f8674356349e032e/Y_2024_e.pdf?1741784299</a></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.	VW analysis	Volkswagen points
	<b>4.4. Remedy</b>	4.4.1 Workers and the representative organisations of workers' own choosing are formally included in the remedy process.	1	<p><b>50%:</b> 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><b>50%:</b> the company provides examples or case studies of remedy provided to workers for confirmed breaches of workers' rights in the supply chain.</p>	<a href="#">Not disclosed</a>	0

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

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