



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

**This statement has been issued in accordance with Section 54 of the United Kingdom Modern Slavery Act 2015. It describes all the measures taken by Automobili Lamborghini S.p.A. in order to avoid any forms of modern slavery and human trafficking.**

### **Organization**

Automobili Lamborghini is an Italian Company located in Sant'Agata Bolognese, with the sole shareholder AUDI AG, and it is part of the Volkswagen Group. The Company's purpose is the development, the design, the production and the sales of super sports cars worldwide known for their unique DNA. With 144 Dealers in 49 Countries, Automobili Lamborghini has a balanced distribution of sales in three macro regions as EMEA (Europe, Middle East and Africa), USA and Asia-Pacific, each one representing approximately one third of the worldwide sales.

### **Internal measures**

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

The Company, to ensure the legality, correctness and transparency in the management of its business and its activities, has adopted an [Organizational Model 231/01](#)<sup>1</sup>, according to Italian Law Decree 231/01, and an [Ethic Code](#), that has been updated in 2017 Year. The revised Ethic Code is based on shared values, such as honest behavior, integrity and acting in compliance with all Company's rules, regulations and responsibility. The Organizational Model as well as the Ethic Code apply to all individuals working in the interest of Lamborghini, either inside either outside the Company.

In particular:

- with the Special Part n. 5 of the Organizational Model 231/01 "Crimes against individuals", the Company has defined the areas that could present a risk of crimes' commission provided in art. 25 *quinquies* of the Decree. The aforementioned crimes are related to those that could lead or help the finding of workers in condition of slavery, for example through the human trafficking. Therefore, expected behaviors towards employees and business partners are defined for running business ethically and for avoiding any form of slavery.
- the Ethic Code guides employees to observe the Company's rules at their workplace towards business partners and society, providing assistance and advice. The rejection of all forms of modern slavery and human trafficking likewise forms part of the Automobili Lamborghini's new Ethic Code. Our Company has also defined the values and the responsibilities that Automobili Lamborghini recognizes, helping to establish a business based on social and responsible behavior and complying with the requirements of collective labor standards and agreements. In doing so, the Company acts in accordance with the values set out in the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the declarations of the International Labour Organization (ILO).

### **Whistleblower System**

Employees and third parties that during their activities become aware of notices related to the commission of crimes that involve the Company or of behaviour not complying with the rules of conduct and the Ethic Code provisions, must timely inform the Independent Body of the Company in writing at the following e-mail addresses: [odv@lamborghini.com](mailto:odv@lamborghini.com) or [odv-anonymous@lamborghini.com](mailto:odv-anonymous@lamborghini.com) (for further guarantee of confidentiality) or to the Company's post address "To the attention of the Independent Body" Modena n. 12 Street - Sant'Agata Bolognese - BO.

In accordance with the established procedural principles it will be ensured the best possible protection of the information provider as well as the person concerned, guaranteeing an effective investigation and punishment

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



concerning the violations. A potential violation of human rights is considered a serious violation both by Automobili Lamborghini and VW Group. Therefore, any aforementioned violation will be reported and managed through the [VW group-wide "Whistleblower System"](#).

### **Qualification of employees**

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

Therefore, employee information disclosure and training at all hierarchical levels play a crucial role within our organization. Also employees who join Lamborghini are invited to participate to the compliance training of which the topic of human rights protection is part of.

For all the collaborators, suppliers and clients and those who have business relations with the Company and/or act on behalf of Lamborghini towards third parties, relevant compliance clauses in relation to the Organizational Model 231/01 and the updated Ethic Code are present in all their respective contracts of which contents are available on the Company's website [www.lamborghini.com](http://www.lamborghini.com). For the employees both aforementioned documents are available on the Intranet page and on the website.

### **Risk analysis**

Within the Company's risk management process (carried out on quarterly and on annual basis), regular risk assessment pertaining to human rights is also carried out by the internal key divisions, including the updates of the countermeasures taken. Risk Management reports are submitted to the local and Group Management.

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

In order to maximize the benefit of potential synergies, we select suppliers in close consultation with Volkswagen Group Procurement. All measures and efforts taken by the Volkswagen Group in promoting sustainability in the supply chain, as well as to safeguard and respect human rights, also contribute to achieve Automobili Lamborghini goals, in addition to the independent activities undertaken.

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

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

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

Furthermore, for specific clusters of Business Partners, integrity checks are conducted (Business Partner Check).



## Outlook

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

Automobili Lamborghini S.p.A.  
*June 2018*

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

Stefano Domenicali

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

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

Paolo Poma

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