



VfL WOLFSBURG

VfL Wolfsburg-Fußball GmbH

Slavery and Human Trafficking Statement

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 the Volkswagen Group in order to avoid any forms of modern slavery and human trafficking.

Organization

The VfL Wolfsburg-Fussball GmbH is a GmbH under German law. We are a Football club that is active in German professional football. As a 100% subsidiary of Volkswagen AG we share common values with our parent company especially concerning human rights.

Measures taken

Code of Conduct

We have implemented the Volkswagen Code of Conduct at VfL Wolfsburg. The Code of Conduct seeks to help employees observe the Group's rules at their workplace, as business partners and as members of society, providing them with guidance, assistance and advice. The rejection of all forms of modern slavery and human trafficking likewise forms part of the Code of Conduct.

Whistleblower System

The Whistleblower System is responsible for handling reports of serious breaches of rules and legal violations. It constitutes an important element of good company management. Our employees, business partners and other third parties may use various channels in the Whistleblower System to report serious employee compliance breaches. A violation of human rights is an example of such a severe breach. The Whistleblower System provides a fair and transparent process that protects the Company, the persons affected and the whistle-blower. A specially protected online reporting channel and the appointment of ombudspersons ensure that all reports can be forwarded anonymously to the office responsible





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for clarifying the matter. Any retaliatory action against whistle-blowers constitutes a serious rule violation and will not be tolerated. The persons concerned are presumed innocent as long as no violation of a rule is proved.

Risk analysis

Risk assessments pertaining to human rights are conducted and the countermeasures taken in response are reported to the managing directors. The annual regular GRC process supports the

recording process of potential risks by means of a list of focus areas, which also includes potential risks arising from the violation of human rights. Quarterly, annual and ad-hoc reports are submitted to the Brand and Group Board of Management as well as the Audit Committee.

Employee qualification

By taking preventive measures, we promote compliance with regulations in our organization and raise the awareness levels of our employees. Therefore, employee information and training at all hierarchical levels play a crucial role within our compliance work.

As our procurement staff constitute a material link with our business partners, all new purchasers are briefed and trained on sustainability matters and potential risks. At the same time, we make sure that our employees are familiar with the internal systems and processes as well as the sustainability requirements that our business partners are expected to comply with in order to report to the responsible units any breaches of our sustainability requirements that are observed.

Sustainability requirements for our suppliers

The Sustainability in Supplier Relations concept is based on the Volkswagen Group requirements regarding sustainability in its relationships with business partners (Code of Conduct for Business Partners). These set out the Volkswagen Group's expectations of our business partners' conduct with respect to core environmental, social and compliance standards, including internationally acknowledged human rights. By integrating the sustainability requirements in our procurement process at the contractual level, we seek to ensure that our sustainability standards are observed along the entire supply chain worldwide. Our requirements are based on international standards such as the principles of the UN Global Compact, the





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ICC Business Charter for Sustainable Development and the conventions of the International Labor Organization.

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