

MODERN SLAVERY STATEMENT

For the year ended 31st December 2025

This statement is made on behalf of Bentley Motors Limited. It is prepared in accordance with Section 54 of the Modern Slavery Act 2015, as enacted in the United Kingdom and will be updated annually. Statements relating to previous years can be found [here](#) on the Bentley Motors Website.

ORGANISATION

Bentley Motors Limited ("Bentley") manufactures some of the world's most sought-after luxury cars. The company headquarters in Crewe, UK, is the hub of its operations including design, development and production of the company's product lines; Continental, Flying Spur, and Bentayga. The site in Crewe is also home to Mulliner where rare artisanal skills, modern sustainable design and cutting-edge engineering and innovation, produce personal commissions and low volume coach-built products such as Bacalar, Batur, Blower, and Speed Six Continuation Series. The company also retails Bentley branded merchandise. Bentley has been part of the Volkswagen Group ("Group") since 1998 and forms part of Brand Group Progressive alongside Audi, Lamborghini and Ducati.

Bentley recognises the importance of behaving ethically and responsibly to create a sustainable and fair environment for all stakeholders. This includes the establishment, preservation and continuous improvement of appropriate working conditions within the company, its suppliers and its business partners.

With specific regard to the Modern Slavery Act, Bentley has a cross functional steering group which formally meet monthly or as is necessary. The steering group includes representation from Compliance, Legal, Purchasing, People & Culture, Security, Strategy, Government Relations & Sustainable Luxury, and Sales & Marketing. The working group is responsible for implementing and maintaining the relevant policies, controls, communication and training relating to business human rights risks, including Modern Slavery.

In 2025, Bentley continued to strengthen sustainability governance through Board and leadership oversight, supported by structured portfolio reviews, strategy forums and Action Field Steering Committee reviews. The Bentley Sustainability Council, comprising independent external experts, continued to provide advice and challenge to the Board and leadership team on sustainability strategy, including responsible sourcing and supply chain matters. Following a three-year review, the Council will continue for a further three years.

You can read more about commitment to transparency and traceability in our Supply Chain in our **2025 Sustainability Report** available on our [website](#).

People, Labour Rights and Worker Voice

Bentley employs over 4,000 colleagues and works with a network of around 250 suppliers providing contract and agency labour. All recruitment processes include right-to-work checks are designed to uphold ethical labour standards. Bentley requires its labour suppliers to carry out equivalent right-to-work checks for all workers they provide.

Bentley recognises Unite and GMB unions as the collective bargaining bodies for the Tarif, non-management, population. In 2025, Bentley continued regular engagement with union leadership, including a weekly meeting to discuss operational matters, share company information and provide a forum for employee-related issues to be raised. Additionally, the Company and Trade Unions meet monthly to discuss more wide-reaching company and strategic topics. Information about both unions is provided in onboarding packs for new starters, including apprentices and graduates. This supports a culture where colleagues are encouraged to raise safety and welfare concerns.

Bentley also developed manager awareness training on trade unions in 2025, with plans to roll this out to all managers in 2026. This supports informed engagement with recognised worker representatives and reinforces Bentley's commitment to open dialogue, fair treatment and respect for labour rights.

POLICIES

The Policy Management policy at Bentley outlines the governance framework and sets binding standards for Bentley Operating Policies ("BOP"). People & Culture and IT Policies are additional binding standards managed by their respective departments. All BOPs are approved by the CEO and must be reviewed every two years unless amendments are required sooner. Policies are published in English, and employees can access translations through a secure Group machine translation tool if needed.

Code of Conduct

All Bentley employees and its business partners are expected to adhere to our Code of Conduct. This code specifies the expected behaviours of all concerned with regard to ethical, social, environmental, and sustainability standards. For employees, the Code of Conduct provides a framework to enable us to meet regulatory requirements and is based on the Group Code of Conduct, which sets out the binding guidelines applicable to all employees of Group worldwide.

The Group Code of Conduct for Business Partners defines our sustainability expectations towards suppliers, retailers and authorised repairers, and addresses human rights such as the strict avoidance of any kind of slavery, human trafficking, child labour or unjust discrimination. It specifically requires all business partners to act with integrity and be vigilant against human rights abuses and the importance of raising any concerns to Bentley or Group. A copy of the Code of Conduct and the Group Code of Conduct for Business Partners are publicly available for download from the [Bentley Motors Website](#).

Business Human Rights Policy

To address the continued risk of Modern Slavery and other business human rights violations, Bentley has a dedicated Business Human Rights BOP, which is reviewed regularly to ensure that Bentley continues to adapt to the changing needs of the environment.

The policy informs Bentley colleagues about the issues of business human rights, raises awareness within the business and clarifies expectations regarding Modern Slavery.

As part of Group, Bentley aligns with the UN Guiding Principles on Business Human Rights which refer in particular to the Universal Declaration of Human Rights and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.

Particular legislation in the UK includes but is not limited to:-

- The Health and Safety at Work etc. Act 1974
- Trade Union Labour Relations (Consolidation) Act 1992
- Employment Rights Act 1996
- Human Rights Act 1998
- Immigration, Asylum & Nationality Act 2006
- Equality Act 2010
- Modern Slavery Act 2015
- Part-Time Workers (Prevention of Less Favourable Treatment) Regulations 2000 & Fixed-Term Employees (Prevention of Less Favourable Treatment) Regulations 2002
- Employment Rights Act 2025

From a European perspective, the German Supply Chain Due Diligence Act ("LkSG") 2023 is also applicable to Bentley's operations.

The Business Human Rights policy refers to guidance on how to spot, and report suspected breaches of human rights. It strongly encourages employees to raise any concern about a possible breach of human rights immediately, and refers to the company Whistleblower System policy.

The Whistleblower System

Bentley has a Whistleblower System available through the Bentley website. The system provides confidential, secure and, where required, anonymous channels for colleagues, business partners and third parties to raise concerns. Reports can be made through a range of channels, including; email, post, telephone, online, a mobile app, in person, or via an external ombudsman.

The Whistleblower System is also the reporting channel for allegations relating to environmental and human rights violations within Bentley's business area and supply chains, in accordance with the LkSG. This includes concerns relating to unethical supplier practices, forced labour, child labour, human trafficking, unsafe working conditions, discrimination or other potential human rights impacts. In this context, the system also acts as Bentley's Supply Chain Grievance Mechanism.

The system is available 24/7 and can be used in multiple languages. Guidance is published for colleagues, business partners and third parties, including on Bentley's website and internal communication channels. Key contact points receive regular training to support consistent handling of reports and to ensure concerns are escalated appropriately.

All reports are managed sensitively, impartially and in strict confidence. Procedural fairness applies to whistleblowers, persons implicated and any other individuals involved. Bentley policy also prohibits retaliation against whistleblowers who raise concerns in good faith and remains committed to protecting individuals who report suspected misconduct or potential human rights impacts.

In 2025, the Whistleblower System policy was updated to include violations of fraud law as a Serious Regulatory Violation, further strengthening Bentley's broader compliance framework and speak-up culture.

Further information on the Whistleblower System can be found [here](#).

Supplier Sustainability Standards

Bentley expects its Suppliers to comply with all applicable laws and regulations, including but not limited to, employment, environmental, and human rights requirements, alongside the Group sustainability standards. These include:

- International Labour Organisation (ILO) core labour standards;
- the principles of the Global Compact, and the
- International Chamber of Commerce Business Charter for sustainable development.

These sustainability expectations form part of Bentley's supplier onboarding and ongoing supplier management processes, including the supplier assessment, contractual, and due diligence activities described in this statement.

The sustainability standards are publicly available for download on the [Volkswagen Group Supplier Portal](#) in eight (8) languages.

If a supplier is in breach of these requirements, the company reserves the right to require corrective action and, where necessary, terminate the relationship.

IDENTIFYING RISKS

Potential concerns regarding Modern Slavery are monitored through a risk management system. This involves a quarterly process to identify, assess and mitigate risks within the company. Compliance with internal policies and the Group sustainability requirements is regularly assessed. There are various internal controls implemented as part of the risk management system.

As an automotive manufacturer, Bentley has an international and highly complex supply chain and recognises the risk this poses in achieving total visibility. Bentley adopts a consistent level of diligence with its suppliers across all regions to ensure its approach to human rights is replicated through the supply chain. The same principles equally apply to suppliers providing on-site support services at Bentley, for example; on-site catering, construction and cleaning which the UK government previously highlighted as sectors with a heightened risk of forced labour exploitation.

Compliance Risks

Potential compliance risks, including the risk of human rights violations, are recorded and assessed in the Group Risk Management system. Preventative measures are developed and investigations are conducted by relevant departments, including but not limited to, Corporate Audit, Security, Legal, Purchase, and Human Resources, where required.

For any Bentley employee with questions or concerns relating to compliance issues, there is a dedicated compliance email address.

CONDUCTING DUE DILIGENCE

Supplier Self-Assessment

Bentley continues to apply the Group 'Sustainability S-Rating' as part of its supplier assessment process. The S-Rating evaluates direct suppliers against environmental, social and integrity requirements, including the sustainability standards set out in the Group requirements for business partners. These requirements include expectations relating to human rights, labour standards, the prevention of forced labour, child labour, human trafficking and discrimination, as well as ethical business conduct. For relevant procurement volumes, a positive S-Rating is required before suppliers can enter into a business relationship with Bentley or Group. The assessment considers each supplier's risk exposure and minimum requirements, including environmental, social, human rights and corruption risks.

In 2025, Bentley linked sustainability metrics collected through the mandatory S-Rating process to the Group Raw Materials Due Diligence Management System (RMDDMS). The RMDDMS supports the identification, assessment and avoidance of actual and potential negative impacts and human rights risks in upstream raw material supply chains, and enables mitigation actions where required.

Recognising that suppliers vary in maturity and capability, Bentley developed a responsible supply chain roadmap in 2025. The roadmap covers environmental, social and governance topics and embeds key elements of Bentley's sustainability strategy. As part of this approach, Bentley introduced the concept of supplier Sustainability Days, with the first event planned for 2026, to showcase best practice, encourage peer learning and support capability building across the supply base. This collaborative approach is intended to help suppliers understand Bentley's expectations, improve sustainability performance and strengthen responsible business practices across the supply chain.

Sustainability Audits

Bentley retains the right to commission an independent, external service provider to check that suppliers are operating in accordance with the expected behaviour outlined in the Group sustainability standards.

The outcome of these audits is reviewed by the expert team responsible for the supplier's region and, if necessary, an action plan put into place to address shortcomings. If the supplier is found to be in breach of the Group sustainability standards, and is not prepared to make the necessary changes, Bentley can opt to terminate the relationship.

In the case that a concern is raised regarding a second or third tier supplier, the same principles apply and Bentley will investigate the case with the first-tier supplier with the closest relationship to Bentley and/or Group.

Retailer Network

Retailers and authorised repairers are subject to compliance due diligence prior to entering into a contract, and on-going integrity monitoring throughout the contractual period. If an integrity concern is identified during the contractual term, an investigation is conducted and if the business partner is found to be in breach of compliance obligations, Bentley reserves the right to require corrective action and, where necessary, terminate the relationship.

MONITORING EFFECTIVENESS

Bentley continues to utilise the joint Self-Assessment Questionnaire (SAQ), developed by members of the Drive Sustainability initiative and facilitated by CSR Europe. The SAQ is hosted on the supplierassurance.com platform by NQC Limited and enables suppliers to complete a single assessment and share responses with multiple customers, reducing duplication and administrative burden.

Where minimum requirements are not met, or where SAQ responses indicate increased sustainability risk, Bentley applies a risk-based approach to further due diligence. This may include On-Site Checks (OSC) conducted by independent, internationally experienced audit providers. These checks are designed to assess supplier sustainability performance in more detail and to support improvement where gaps or non-conformities are identified. Following an OSC, suppliers are informed of the outcome and, where required, corrective action plans are agreed and monitored.

Group Audit provides independent and objective services aimed at improving business processes to assess and help to improve the effectiveness of risk management controls, and management and monitoring processes. This includes the COSO Enterprise Risk Management Framework. In addition, it carries out sample checks, as well as investigations of suspected violations.

COMMUNICATION AND TRAINING

Bentley communicates with all employees to build awareness of the risks relating to human rights including Modern Slavery; this includes articles on the company intranet and communications on the Bentley BeConnected App, that can be accessed by all employees. The topic of human rights forms part of the Bentley integrity and compliance annual communication plan. It is intended that these communications will continue to be issued on a regular basis.

All employees are required to undertake Code of Conduct and Human Rights training and must refresh their understanding at defined intervals according to their role and training requirement. The training includes:-

- Code of Conduct
- German Supply Chain Due Diligence Obligations (LKsG).
- Modern Slavery
- Business Human Rights

In 2025, Bentley implemented a new Prevention of Economic Crime policy, supported by mandatory training modules for all colleagues as part of its broader approach to embedding compliance into everyday operations. This supports Bentley's expectation that colleagues speak up and do the right thing.

Employees can provide feedback on the training through a form after face-to-face sessions or a survey after web-based training. This feedback is periodically reviewed and incorporated into training updates where appropriate.

All Bentley suppliers and purchasing colleagues have access to an e-learning module outlining the Group expectations on sustainability. This is accessed through the Group Supplier Portal. Retailers and authorised repairers are required to appoint a responsible person and to undertake the Group Code of Conduct for Business Partner training which is accessed through a Retailer Academy portal.

SUMMARY

In 2025, Bentley continued to strengthen its approach to preventing Modern Slavery and managing broader business human rights risks across its own operations, supply chains and business partner relationships. Key areas of progress included continued use of the Group Sustainability S-Rating as part of supplier assessment, linking S-Rating data to the Group Raw Materials Due Diligence Management System, development of a responsible supply chain roadmap, continued operation of the Whistleblower System and Supply Chain Grievance Mechanism, and ongoing communication and training for colleagues and business partners.

Bentley also continued to monitor relevant legislative and reporting developments. In 2025, Bentley Motors Canada Ltd, a wholly owned subsidiary of Bentley, published its second Forced Labour in Canadian Supply Chains Annual Report. Bentley will continue to review applicable reporting obligations and align its governance, due diligence and disclosure processes accordingly.

Bentley recognises that Modern Slavery and human rights risks require continuous vigilance. This statement outlines Bentley's commitment to tackling Modern Slavery in all aspects of its business and supply chain, and will continue to evolve over time to demonstrate progress on this important issue.

This statement was approved by the Board of Management of Bentley Motors Limited on 18th June 2026, in accordance with the requirements of the Modern Slavery Act 2015.



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Frank-Steffen Walliser
Chief Executive Officer and Chairperson of the Board
Bentley Motors Limited
18th June 2026