



H.E. António Guterres
Secretary-General
United Nations
New York, NY 10017
USA

September 15th, 2022

Dear Mr. Secretary-General,

I am pleased to confirm that Automobili Lamborghini S.p.A. supports the Ten Principles of the United Nations Global Compact on human rights, labour, environment and anti-corruption. With this communication, we again express our intent to continue implementing those principles. We are committed to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative projects that advance the broader development goals of the United Nations, particularly the Sustainable Development Goals.

Automobili Lamborghini S.p.A. will make a clear statement of this commitment to our stakeholders and the general public pursuing a specific business strategy based on a program of corporate ethical responsibility. The company's objective is to create value through responsible actions towards the world in which it operates, thus contributing to the sustainable development of the economy and society with constant care for the planet in where we live. Furthermore, in May 2021, Automobili Lamborghini presented "Direzione Cor Tauri", a roadmap to decarbonization of future Lamborghini models and of the Sant'Agata Bolognese site based on a holistic approach to its environmental sustainability strategy.

We recognize that a key requirement for participation in the UN Global Compact is the annual submission of a Communication on Progress (COP) that describes our company's efforts to implement the Ten Principles. We support public accountability and transparency, and therefore commit to report on progress within one year of joining the UN Global Compact, and annually thereafter according to the UN Global Compact COP policy.

This includes:

- A statement signed by the chief executive expressing continued support for the UN Global Compact and renewing our ongoing commitment to the initiative and its principles. This is separate from our initial letter of commitment to join the UN Global Compact.



- A description of practical actions (i.e. disclosure of any relevant policies, procedures, activities) that the company has taken (or plans to undertake) to implement the UN Global Compact principles in each of the four issue areas (human rights, labour, environment, anti-corruption).
- A measurement of outcomes (i.e. the degree to which targets/performance indicators were met, or other qualitative or quantitative measurements of results).

Sincerely yours,

A handwritten signature in blue ink, which appears to read "St. Winkelmann". The signature is fluid and cursive, extending across the width of the page.

Stephan Winkelmann
Chairman and Chief Executive Officer



Automobili Lamborghini accelerates to Sustainability projects and United Nations Sustainability Development Goals (UN SDG)

Lamborghini's goal is to create value by acting responsibly towards the world in which it operates, thereby contributing to sustainable development of society and the economy while placing a consistent focus on ecology.

In a moment like now, where the whole Earth is forced to face an historic turning-point, and with the economists' outlook asserting consumptions will regress 25 years, companies' sustainability goals have diametrically changed. Milestones for these companies encompass poverty, social support and activities, and environment: areas heavily affected, although not exclusively, by this crisis. Increased effort will be needed by companies that recognize values and sustainability to raise global balance again. In this context, Automobili Lamborghini aims to maintain deeper engagement in social responsibility activities, as UN SDGs suggest.

In this regard, Lamborghini has already launched numerous environmental sustainability programs.

Automobili Lamborghini's environmental policy takes into account every aspect of operating a business within a community, and this commitment has made it the first, and so far the only, Italian automotive company to attain the EMAS environmental certification: an instrument which has been adopted by the Council of the European Union with the specific goal of highlighting the role and responsibility of businesses in safeguarding the environment. This important accreditation was awarded in July 2009, just a few months after the company achieved ISO 14001 certification, thereby meeting the international requirements for environmental management.

Automobili Lamborghini recognizes the United Nations' SDGs as important guidelines to follow in order to give everyone the chance to live in an evolved world that is sustainable from an environmental, social and economic point of view.



People are at the center of Lamborghini's corporate strategy: one of the main policy goals involves a focus on employee wellbeing through a structured program of initiatives. The company's plan aims to improve employees' wellbeing not only from a financial point of view, but also and above all in psycho-physical terms, precisely by putting people, individuals, at the center of corporate organization.

Employees have access to a wide range of activities and services, first and foremost **a supplemental health insurance plan** that also covers their families. Workers can consult nurses and the company physician at work in a cutting-edge infirmary. Lamborghini believes



in the importance of cancer screening, and for this reason breast cancer detection activities are organized in the workplace for employees, who are also able to request an annual flu vaccination.

In designing workstations, great attention has been paid to ergonomics and human-machine-environment interaction with a view to employee safety and prevention of workplace accidents.

In 2018, Automobili Lamborghini created a 950-meter-long fitness trail in the Lamborghini Park, featuring eight different stations: the **LamboFIT program provides a structured range of fitness courses** dedicated to Lamborghini's employees, including Yoga, Pilates, cardio fitness and postural gymnastic lessons held in the park. This focus on employee well-being is also carried through to dietary matters, with the introduction of a wellness menu in the company canteen. In terms of health and well-being topics, the company has implemented numerous initiatives, supplying pediatric first-aid training courses and dedicated sessions on illness prevention and correct diet.

With the introduction of the Urus Super SUV, the company doubled its volumes, turnover, and space occupied, along with a substantial increase in the number of employees, reaching over 1,800 by the end of 2019: up 62% over the previous five years. The more than 100 new-hires last year were balanced between administrative staff and production line employees, and further lowered the average employee age, currently under 39 years old. Moreover, with a 43% increase in customer deliveries, from 5,750 to 8,205 units worldwide, the Italian super sports car brand saw **sales growth for the ninth consecutive year**, setting a new record.

With the increase in volumes and turnover, the company's commitment to its employees has also grown: in 2020, **for the seventh consecutive year, Lamborghini received the prestigious "Top Employer Italia 2020"** certification, an award given by the Top Employers Institute, a global certification body for companies that achieve the highest quality standards in their human resource management policies. The certification recognizes Lamborghini's strategic approach to human resource management, based on the enhancement of individual skills on one hand, and the promotion of social values and ethical corporate responsibility on the other.

Another activity that brought significantly positive reactions and confirms Automobili Lamborghini's tangible commitment during the pandemic, has been the production of **surgical masks and medical shields**. Automobili Lamborghini, with a direct and mandatory action supported by Emilia-Romagna Region, has converted departments of its super sports car production plant in Sant'Agata Bolognese to produce surgical masks and protective plexiglass shields. The masks have been donated to the Sant'Orsola-Malpighi Hospital in Bologna to be used in the fight against the COVID-19 pandemic. Producing 1,000 masks a day, this solidarity initiative has been carried out by atelier personnel that produce the interiors and specialty customization for Lamborghini cars. Realizing 200 units a day, the



medical shields are manufactured using 3D printers within the carbon fiber production plant and Research and Development department.



In order to support schools, universities and institutions in their mission of guaranteeing young people a comprehensive educational pathway corresponding to the needs of an ever-changing economic world, Automobili Lamborghini is committed to continuous investment in education and training, **through partnerships with local universities, business schools and high schools**, allowing students to gain their first experience in the automotive sector.

Lamborghini is a key member of the **Motorvehicle University** of Emilia-Romagna, MUNER, a particularly innovative project that has brought together four universities and eight automotive firms based in Motor Valley to train future automotive professionals who are able to operate Industry 4.0 production lines to produce road vehicles, racing vehicles, sustainable engines and smart systems.

There are also partnerships with local high schools. These partnerships include teacher training and continuing education; production line and museum visits with integrated training events; and participation in P.O.N (*Programmi Operativi Nazionali*, national operational programs) promoted by the Italian Ministry of Education.

Two **DESI Training Centers** were inaugurated in 2015 by Lamborghini and Ducati; the two companies have been working together since 2014 on the major **social project DESI, or "DualEducation System Italy"**. The project was born in collaboration with the Volkswagen Employees' Foundation, Audi, the Italian Ministry of Education, and the Emilia-Romagna Region.

The central purpose of the project, which has become an integral part of the study plan of the Technical Institutes involved, can be divided into two main goals. The first is to support the territory and the labor market by training technicians through the most innovative methods. Secondly, the project supports schools in the development of joint educational programs capable of merging the essence of the school and business worlds, while helping to prevent young people leaving school early. Among the project's key objectives is to combine teaching within a work context, making use of a dedicated company team. This allows students to effectively integrate themselves within the workplace, orienting themselves in relationships and sharing experiences and knowledge by working in a team.

By continuously alternating activities within the classroom and the company, the study path develops over a two-year period, allowing young people to approach the more complex



issues of company production systems and the automotive world with increasing autonomy. At the end of the course, in addition to obtaining the five-year Professional Diploma in Maintenance and Technical Assistance, students receive a company certification detailing the skills acquired and practiced during the course.

In order to make itself competitive in the market and to guarantee the personal and professional growth of its employees, Automobili Lamborghini is investing in internal training with an extensive catalog of courses that aim to develop both soft and hard skills, while a structured internal **Job Rotation** program ensures ever-increasing cross-sector learning, allowing employees to extend their skills and improve career possibilities.

Lamborghini MUDETEC (Museo Delle Tecnologie) is supporting the **Affido Culturale** project. The initiative proposes to identify and involve 200 families in 29 cultural events via affiliations with cultural organizations in the region. Through this cooperation, families with children that don't have access to cultural activities for various reasons - linguistic, physical, economic or social barriers - will be able to visit, for free, MUDETEC inside Automobili Lamborghini's factory.

In 2017, the company signed an agreement with the **MIT in Boston** - the Massachusetts Institute of Technology, and specifically with two of its specialized centers: the Dinca Research Lab headed by Prof. Mircea Dincă of the Chemistry Department, and the Mechanosynthesis Group led by Prof. Anastasios John Hart of the Mechanical Engineering Department. The project's goal is to allow Lamborghini to develop the **technologies necessary to address the future of the super sports car** in five different dimensions: energy storage systems, innovative materials, propulsion systems, visionary design, and driving emotion. The joint research aims to radically transform the technologies involved in energy storage and composite materials.

In 2019, the collaboration between Automobili Lamborghini and the Massachusetts Institute of Technology produced a major initial result: a patent for an innovative synthetic material that will serve as the technological base for a **new generation of supercapacitors**. Supercapacitors already represent a winning solution in high-performance motorsport applications by virtue of their exceptional power and durability specifications, and they promise to become an essential technology for years to come. Automobili Lamborghini is a co-author of this patent. Further research will explore additional optimization of the material's properties, and its production on an increasingly larger scale. On a broader level, the materials development is part of the shift towards electric vehicle technology undertaken by Automobili Lamborghini in 2017 with the presentation of the Terzo Millennio, and most recently with the Lamborghini Sián, unveiled at the 2019 Frankfurt Motor Show.



With a view to achieving gender impartiality and reducing inequality amongst its employees, Automobili Lamborghini promotes initiatives to improve **Work Life Integration**, such as a structured program which includes **activities and incentives not just for maternity but also for paternity**. The aim is to favor parental equality through the integration of numerous activities and services for mothers and fathers, including preferential parking, coaching support upon returning to work, and wage subsidies of up to 60% of the salary during supplemental maternity or paternity leave, as well as extra leave in the event of child sickness.

The incentives in the gender equality area fall under a wider framework: Lamborghini operates an equal pay regime for women and men with equivalent qualifications and duties. Moreover, the company offers **remote working** in order to ensure work-life balance.

As a committed supporter of the value of sharing, and in order to incentivize collaboration with other companies, Automobili Lamborghini is a member of the Bolognese business network Capo D (*Comunità di Aziende per le Pari Opportunità*, community of companies for equal opportunities), which aims to create a single system of organizations working in close partnership with local public institutions in order to encourage training and growth of workers, thus creating new career-development chances within an equal opportunities framework. The many goals of the network include developing social responsibility initiatives and sensitizing new generations to gender-equality topics by organizing activities and activities that also aim to increase female presence in STEM environments.

A **reverse mentoring pilot project** was started in 2019, aiming to reduce the generation gap in the company, which now has four different generations within its workforce. This stimulates the transfer of knowledge across junior employees and senior professionals, with a view to continuous skill development and the inclusion of newcomers.

Through its membership of the Capo D business network, the company is pursuing various goals:

- Comparison, networking and sharing of best practices
- Involving local SMEs to further develop social responsibility and welfare matters
- Sensitizing new generations to gender-equality topics by organizing activities and initiatives that also aim to increase female presence in STEM environments



Lamborghini's **cafeteria** became **plastic free** in 2019, switching to paper cutlery wrapping and cups made from completely biodegradable material. Lamborghini employees have **access to free water** coolers in the break areas of the production lines, as well as the company canteens, helping reduce plastic waste by approximately 3.4 tons per year. In 2019 Lamborghini also gifted reusable aluminum bottles to its employees - a further step to a plastic-free restauration system.

Within the Lamborghini Park, inaugurated in 2011, the company also takes care of protecting and restoring the ecosystems in the wet area of the park.



All electric energy used in Automobili Lamborghini derives from certified renewable sources, this thanks to not only guarantees of origin (GO) but also to a large photovoltaic plant and long-distance heating systems. In 2015, the company was certified CO₂ neutral. In early 2010, the company installed a **large photovoltaic system** covering an area of 15,000 square meters. In total, this system ensures a reduction in CO₂ emissions of about 1,000 tons per year. It is one of the largest photovoltaic systems in the industrial landscape of Emilia-Romagna.

In 2012, Automobili Lamborghini opened its new **building dedicated to developing prototypes and pre-series vehicles**. Designed in partnership with the Prospazio engineering firm, the new multi-level facility was conceived specifically to obtain a Class-A energy rating, and was the first industrial building in Italy to feature these characteristics.

In July 2015, Automobili Lamborghini introduced its **new trigeneration and district heating systems**, two of the most significant projects undertaken by the Sant'Agata Bolognese company to obtain the **CO₂ neutral certification for its entire plant**. This certification, within the framework of the Carbon Neutrality program, is the first in the world issued to a company by DNV GL (Det Norske Veritas Germanischer Lloyd), one of the world's leading firms for the classification, assessment and management of environmental risk. Automobili Lamborghini achieved this important goal in 2015, by reducing and offsetting the CO₂ emissions associated with energy usage throughout its production site. The two trigeneration plants, located inside the Sant'Agata Bolognese factory, utilize natural gas to produce electricity, as well as for heating and cooling. The systems boast 2.4 MW of installed



capacity and generate approximately 20,000 MWh per year. The amount of energy produced would be sufficient, for example, to meet the entire yearly demands of all homes in Sant'Agata. Savings in terms of emissions total approximately 1,970 tons of CO₂ per year. In 2021 the trigeneration plants functioning has been optimized allowing further emissions saving (about 189 tCO₂ already included in the 1,970 tCO₂). The company also plans on converting both plants to Biogas, so as to further reduce CO₂ emissions to 12,450 tons every year.

Automobili Lamborghini is also the first automotive company in Italy to use a **district heating system**. This system distributes hot water throughout the factory from a biogas-fueled cogeneration plant located about six kilometers away, through a network of underground pipes. Lamborghini chose to use the energy generated by a cogeneration plant that would otherwise have been lost. In 2021 the project allowed to supply Lamborghini with 3,300 MWh of thermal energy, and to reduce greenhouse gases to approximately 470 tCO₂.

In 2017, Lamborghini opened its new state-of-the-art office building, **Torre 1963**. The new building received a record score for Italy of 92 points in the **LEED (Leadership in Energy and Environmental Design) Platinum certification**, the world's most authoritative certification program for environmentally sustainable buildings. It is the first office building within a manufacturing site in Italy to receive this certification, which is awarded to "green" facilities that combine innovation and sustainability.

In 2018, the Sant'Agata Bolognese **factory** was expanded from **80,000** to **160,000 m²** for the launch of the Urus project. The new production site includes a new assembly line dedicated entirely to the Urus; a new finishing department for all Lamborghini models; a new test track with thirteen different terrains specifically for SUVs; a new logistics warehouse; a second trigeneration plant; and the new energy hub for the centralized production of all energy carriers serving the site. The new buildings are all rated "A" by the Emilia-Romagna regional energy classification board. The outer structure of the building window surface has been designed to achieve the highest possible energy performance through use of a very high-performance polycarbonate facade system. All lighting, including in industrial areas, uses very high efficiency LED lights.

The expansion was carried out fully in keeping with the company's focus on environmental sustainability: **even after its transformation, the entire production plant in Sant'Agata Bolognese has maintained the carbon neutral certification obtained in 2015.**

The **new Urus paint shop**, opened in 2019, has once again reaffirmed Lamborghini's commitment to environmental sustainability. The verticalization of the new plant enabled a significant 30% reduction in footprint compared to a traditionally-designed paintshop of equivalent capacity. The building has a **Class A rating**, features perfect insulation, and is equipped with next-generation LED lighting. **Ninety-five percent of the colors used are water-based.** Solvent emissions are extremely low, thanks to a post burner able to recover heat and reuse it to heat the painting line ovens. This technology provides a 25% reduction in energy consumption. Moreover, the cutting-edge technologies of the air-misting systems provide superior efficiency in terms of paint consumption. Eighty percent of the paint is actually applied to the vehicles' bodywork, compared to about half that figure in standard



systems. Finally, E-Cube technology makes it possible to capture the overspray during the painting process, thereby reducing water consumption for air filtration to zero.

In 2020 Lamborghini started a pilot project to investigate the feasibility of a **recycling process** to turn our carbon fiber waste into Recycled Carbon Fiber Materials that the Company can reuse inside the cars. So far approximately 27 tons of materials were recycled. Part of the carbon fibers that cannot be industrialized internally in the CFK's manufacturing process are delivered to the school, which repurposes them in its own laboratory for educational purposes, in order to train expert technicians in the processing of carbon fiber composite materials (lamination). Students use scraps to create new products with reduced dimensions that do not require any further transformation. Furthermore, materials that cannot be used in production are provided to sport organizations such as Bologna Motorsport (students from the University of Bologna) in order to give them the opportunity to build prototypes and learn composites manufacturing practices not only through study but also through hands-on experience with these materials.

Thanks to an agreement with a local cooperative, part of Lamborghini's **leather scraps** that cannot be used due to size or small defects are selected and transformed into high quality leather goods, using materials otherwise intended to be disposed of as waste. In this case the benefits are not just for the environment, as their production process is ethical and socially sustainable. In 2021 approximately 1,1 tons of materials have been upcycled and the small leather goods created were used as welcome gifts for our guests at the Lounges of Tokyo and New York. From 2021 part of leather scraps approximately 1,1 tons goes also to another corporate aimed at employing disadvantaged people.

Another initiative in which Automobili Lamborghini has had a strong impact is the **LKDF4Industry of UNIDO** (United Nations Industrial Development Organization's Learning and Knowledge Development Facility). LKDF4Industry aims to help the industrial sector to overcome obstacles through knowledge sharing and innovation. The Learning and Knowledge Development Facility promotes demand-driven industrial skills among young people in emerging economies: the global outbreak of Covid-19 has imposed new challenges on the demand for skills while accelerating the need to adapt to new production methods and work arrangements.



Environmental sustainability is incorporated as a goal within Automobili Lamborghini's corporate strategy. Numerous activities provide ample proof of the company's desire to contribute to maintaining a healthy and stable environment.



Thanks to the industrial projects implemented to save the environment and to use clean energy, Automobili Lamborghini **saves up to 5.700 tons of CO₂ each year**, the amount that 285.000 trees would absorb in only one year.

In 2011, the company launched the **Parco Lamborghini**, a pioneering environmental initiative developed in collaboration with the Sant'Agata Bolognese community and the universities of Bologna, Bolzano and Munich. The project involved the **planting of 10,000 oak trees**. Its goal is to better understand the relationships between tree density, forestry productivity and the ability to absorb CO₂ emissions and maintain climactic biodiversity. In order to reproduce local vegetation, a protected 17-acre area was created which incorporates a collection of different species of trees typical to plain areas, a shrub zone, a marshy wetland area, a copse, and fruit trees.

In April 2016, Automobili Lamborghini decided to equip its park with an **apiary in order to begin Environmental Bio-Monitoring using bees**. The environmental bio-monitoring station comprises three of the thirteen beehives which are used to produce honey. The components of the beehive (honey, pollen, wax, propolis, the bees themselves) can be analyzed to reveal a wide range of environmental pollutants: from pesticides used in agriculture and urban and private green spaces to heavy metals, radionuclides, aromatic compounds and dioxins. The three-kilometer average foraging radius around the apiary also covers the factory production plant and the entire village of Sant'Agata Bolognese. In addition to serving its environmental and pollution-monitoring functions, the project is also used for the production of certified Lamborghini-brand honey that is distributed every year to the company's employees. From 2022 is active another technological beehive donated by the Audi environment foundation that allows us to monitor further parameters in real time.

The community of Sant'Agata Bolognese has **free access to the Lamborghini Park**, which hosts sustainable events for employees and the local community, such as educational programs for schools on the topic of environmental sustainability held in the park, alongside a visit at the Lamborghini Museum MUDETEC.

In 2017, Lamborghini launched a new **corporate car-pooling service**. Although currently paused due to the pandemic, the choice is offered to staff to opt for sustainable mobility: a year and a half after its launch, the platform for Lamborghini employees has 450 registered users who, through car-pooling, have already reduced CO₂ emissions by approximately 26 tons.

Thanks to its efforts in addressing environmental sustainability, Lamborghini was also invited to take part in the 38th edition of the **Climate Reality Leadership Corps**, hosted in Berlin by **The Climate Reality Project**. An organization founded by former US Vice President and Nobel Peace Prize winner Al Gore, The Climate Reality Project works to spread awareness on the global effects of climate change, drawing attention to a global solution to this crisis in order to guarantee a sustainable future driven by clean, renewable energy. Lamborghini's has been a compelling journey that sees the company fully committed to raising awareness among its employees and community on the current climate crisis, while



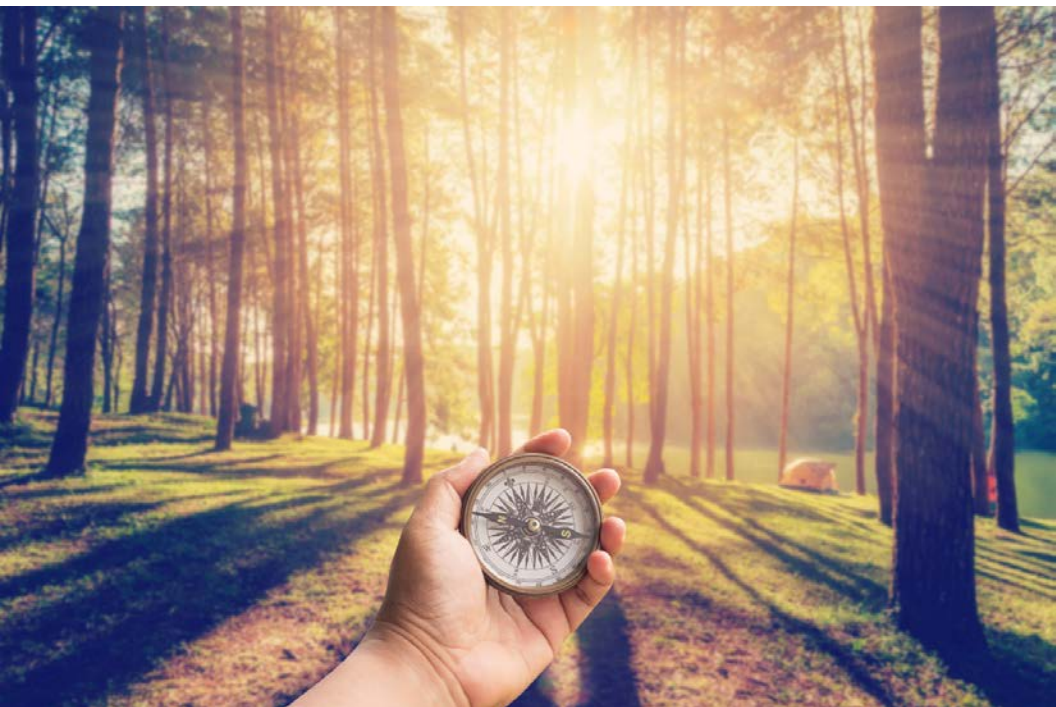
promoting solutions to mitigate its effects through energy transition and sustainable mobility.



In keeping with its social responsibility goals, Automobili Lamborghini works with **EMERGENCY**, an Italian association that promotes a culture of peace, solidarity and respect for human rights, to develop a social cooperation program that creates voluntary work experiences involving employees in the structures and projects managed by EMERGENCY. Employees have the opportunity to take a lead role in a human growth experience, which is important for the development of emotional and social skills, an essential element in company dynamics.



Ethic Code



Annex «A» of the Organizational Model pursuant to the D. Lgs. No. 231/01



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1 Our commitment to Integrity and Compliance

Dear colleagues,

as Volkswagen Group employees we all carry responsibility towards our colleagues, society, the environment, and living creatures. By acting with honesty and integrity we protect our company and preserve the trust of our customers, partners, and the communities we serve. This Code of Conduct embodies our core ethical values and lays the foundation for our actions. It is valid for all Volkswagen Group employees worldwide.

We all commit to comply with applicable laws and regulations and to base our day-to-day decisions on our Group Values and the principles of the Code of Conduct. The Code of Conduct provides us practical guidance and advice on this. It helps us to identify mistakes and wrongdoings and to respond appropriately. For the Volkswagen Group, turning a blind eye can never be the right solution. We speak up - even if that feels awkward and uncomfortable. Everyone who does so can count on our full protection. When in doubt, we seek advice and support.

We, the Volkswagen Group Board of Management, are convinced that compliance, integrity, and fairness are the basis for trust in our company, its products, services, and technologies. In the midst of the biggest transformation our business and working world has ever seen they are and remain essential to our success.

The Volkswagen Group Board of Management

Let us all work together to firmly anchor these principles in our day-to-day lives. By doing so, we are jointly safeguarding the path to the future for ourselves and for generations to come - as a responsible employer, a reliable partner, and a passionate provider of mobility.



2 Foreword by the Board of Management of Automobili Lamborghini

Dear Colleagues,

We hereby wish to share with you the guiding principles that inspire our work and that are now further strengthened, through the Code implemented by the Group.

Our updated Ethic Code confirms once again the existence of a set of shared values based on ethics and integrity, that guide the decisions and the daily actions of all of us in Automobili Lamborghini and of those who collaborate with us. These values not only contribute to enrich our identity, but they also guide our behavior in relationships with third parties and towards the community in which we operate, regardless of the role that each of us cover.

The values guide us in achieving business goals, while maintaining the respect, responsibility, integrity, legality and trust that, together with the passion for research and innovation, are the inspirational principles of our behaviour. In the new version of the Ethic Code, the topics related to our daily life have been contextualized through practical examples, thus offering concrete answers to any possible uncertainties.

This renewed tool will strengthen our sensitivity towards the environment in which we operate, supporting us in our choices and encouraging the involvement of experienced colleagues in the most difficult situations, in order to continue pursuing an ethical and sustainable business.

For all these reasons, the Ethic Code represents a tool that, in addition to providing operational guidelines, strengthens the organization and gives continuity to the adopted approach. Acting according to the rules is not a limit but an opportunity.

The new Code represents integration and completion of our Organizational Model implemented pursuant to Legislative Decree 231/2001 and, any act, procedure or rule adopted to ensure the application of the latter. It intends to promote or preclude certain behaviors, although not expressly regulated in the regulatory framework, establishing ethical principles and rules of conduct relevant for the purpose of reasonable prevention of offenses in the Company's interest or benefit.

Since it is not possible to include into the Code the countless situations that characterize the complexity of our daily life, constant use of wisdom is necessary.

As Managing Directors and Chief Officers of Automobili Lamborghini, it is our responsibility to ensure that the Ethic Code is shared and will continue to be an integral part of your everyday business. The Company's future depends on the initiative of each of us, on our desire to get involved and on our ideas.

With our actions, in fact, we are all crucial part of the Company's business, in order to safeguard its reputation and trust in every situation.



Stephan Winkelmann
Chairman & Chief Executive Officer

Paolo Poma
Chief Financial Officer

Rouven Mohr
Chief Technical Officer

Ranieri Niccoli
Chief Manufacturing Officer

Federico Foschini
Chief Marketing & Sales Officer

Umberto Tossini
Chief Human Capital Officer

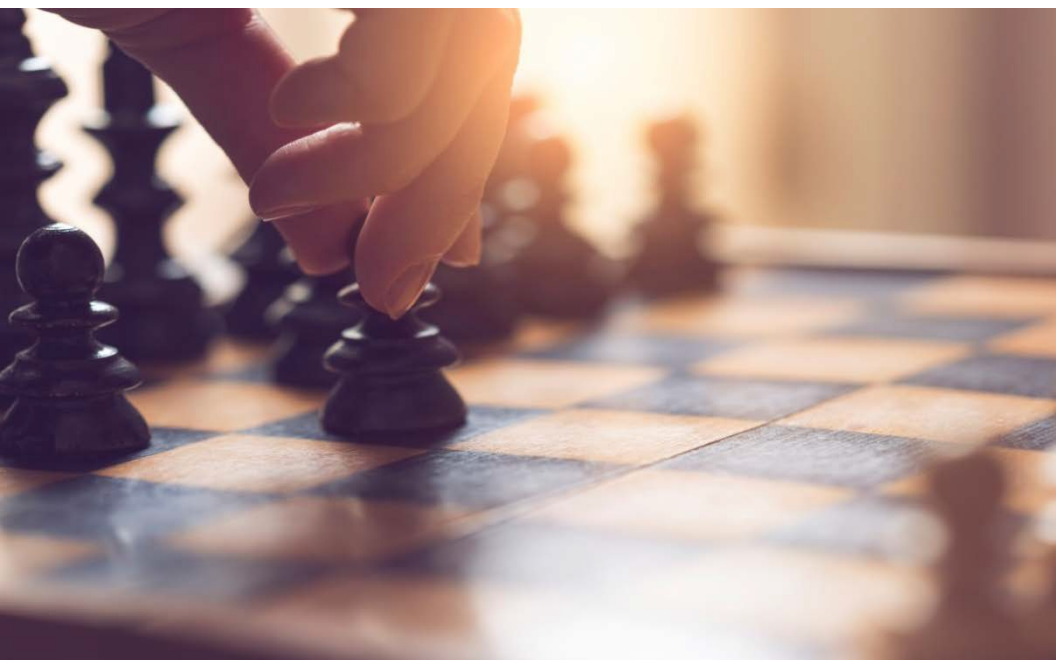
Silvano Michieli
Chief Procurement Officer

3 Our responsibility for compliance

One decisive factor for the success of our Company is that all employees - from Board of Directors members, Chief Officers, managers and each employee as well as all those who act in the interest of Automobili Lamborghini that we define as «Recipients» - must act with honesty and integrity and in an ethical manner. The latter, in fact, are committed to respect and enforce the principles of the Ethic Code (hereinafter «the Code»), according to their functions and responsibilities, relationships with individuals, Companies, public and private institutions in Italy and abroad.

This also means that our internal and external reporting and communications must be truthful, comprehensive and timely.

Our shared goal is to fulfill our responsibility to our Company and to protect the reputation of our brand. Sustainability requires of us an awareness of our responsibility for the economic, social and ecological impact of our actions. Such conduct also means that we all respect and observe the rules in force in the Company everywhere and at all times.



¹ All individuals working in the interest of Automobili Lamborghini, either inside either outside the Company, without distinction or exception, that means beyond the employees and external collaborators who work in the interest and for the benefit of the Company, such as business partners, licensees, distributors, suppliers and all those who may represent it.

Our Board members and managers bear a special responsibility in this context: they are role models and must prevent non-compliant behavior within the Company, protect their employees and conduct themselves with integrity both within the Company and externally.

The Ethic Code helps us by highlighting potential areas of risk and conflict, explaining their significance for our Company and illustrating them using examples. The information contained in this Code is divided into three main sections:

- **Our responsibility as a member of society**
- **Our responsibility as a business partner**
- **Our responsibility in the workplace.**

The Ethic Code serves as a binding guideline in our day-to-day business. It is supplemented by internal guidelines and provisions in employment contracts. It also goes without saying that we all comply with the national and international statutory provisions. This also means that we never take any part in any activity that involves fraud, misappropriation, extortion, theft, embezzlement or any other deliberate damage to the assets of our customers or any third party.

Failure to observe the Ethic Code can result in considerable damage, not only to our Company, but also to us as employees and to our business partners and other stakeholders.

That is why the Ethic Code is binding on all of us, irrespective of whether our role is that of a staff member, a Manager or a Board member. We do not tolerate violations of the Ethic Code.

Anyone who violates the Ethic Code must expect consequences, which, depending on the seriousness of the violation and the type of contractual relationship, could foresee the application of the most appropriate disciplinary measures or contractual sanctions to the offenders of the disciplined conduct, in compliance with the applicable law and the National Collective Agreement in case of employees or of a contract stipulated with a third party, in any case independently from the eventual criminal relevance of the undertaken behaviours and/or from the establishment of a criminal proceeding, in case a criminal offense is committed. To make sure that does not happen, it is up to each and every one of us to familiarize ourselves with this Ethic Code, to integrate it into our own behavior, and to bear the Ethic Code in mind when making decisions. When in doubt, we seek competent advice to the contact points, without prejudice to notifying the Independent Body.

Furthermore, the Ethic Code is an essential and constitutive part of the Organizational Model adopted by Automobili Lamborghini pursuant to the Legislative Decree No 8 June 2001 n. 231 («Decree») in order to avoid and prevent the commission of offenses that imply the administrative liability of the entities.

4 Our responsibility as a member of society

Our social responsibility means that observing and complying with the law is a matter of course. We have a duty to observe the law under which we operate in all business decisions we make.

Every Automobili Lamborghini employee must be aware of his/her social responsibility, particularly as regards the wellbeing of people and the environment, and ensure that our Company contributes to sustainable development.

Automobili Lamborghini's responsibility as a member of society specifically gives rise to the following principles:



Human rights

BACKGROUND

The Declaration of Human Rights adopted by the United Nations and the European Convention for the Protection of Human Rights and Fundamental Freedoms state what is required and expected of the international community when it comes to observing and respecting human rights.

CORPORATE PRINCIPLE

We respect, protect and promote all regulations in force to protect human rights and children's rights (hereinafter called human rights) as a fundamental and general requirement throughout the world. We reject all use of child labor and forced or compulsory labor as well as all forms of modern slavery and human trafficking. This applies not only to cooperation within our Company but also as a matter of course to the conduct of and toward business partners.

MY CONTRIBUTION

As an employee, I can also make my contribution to respecting human rights. I regard human rights as a fundamental guideline and I am vigilant against human rights abuse happening around me.

If I have concerns regarding human rights abuse in my professional surroundings, I prevent it and/or stop it. If necessary, I inform my superior or get in touch with any of the contacts listed in chapter 7.



EXAMPLE

You are responsible for purchasing specific goods. You receive information that a supplier with which you do business uses children in their production process, or that employees are made to work in inhumane conditions (e.g. exposed to health risks). Take the necessary steps and inform your superior and the units responsible for sustainability in supplier relations.

Our Company must examine business relations with this business partner more closely and, if necessary, break them off.

Equal opportunity and equal treatment



BACKGROUND

Equal opportunities and equal treatment are key cornerstones of a fair, unprejudiced and open approach. Automobili Lamborghini encourages respectful cooperation in a spirit of partnership, diversity and tolerance. That is how we achieve a maximum degree of productivity, competitive and innovative capability, creativity and efficiency.

CORPORATE PRINCIPLE

We offer equal opportunities for everyone. We do not discriminate or tolerate discrimination on grounds of ethnic or national origin, sex, religion, views, age, disability, sexual orientation, skin color, political views, social background or any other characteristics protected by law. We embrace diversity, actively encourage inclusion and create an environment that fosters each employee's individuality in the interests of the Company. As a matter of principle, our employees are chosen, hired and supported based on their qualifications and skills.

MY CONTRIBUTION

I observe the principles of equal opportunity and equal treatment and encourage people around me to do the same.

If I see any contravention of the principles of equal opportunity and equal treatment (disadvantagement, harassment or mobbing), I make the persons involved aware of their misconduct. If I am not in a position to influence the events directly, I notify the Human Resources & Organization of the incident or get in touch with any of the contacts listed in chapter 7.



EXAMPLE

You find out from a colleague who is a friend of yours that an applicant in his department was rejected because of the color of his skin, although he was the best candidate for the advertised job.

Help clarify the situation by reporting the case to the relevant Human Resources & Organization so that appropriate steps can be taken.

Product conformity and product safety



BACKGROUND

Countless people come into contact with our products and services on a daily basis. Our Company bears a responsibility for preventing, to the extent possible, any risks, detrimental effects and hazards to the health, safety, environment and assets of our customers or any third party arising from the handling and use of these products and services.

CORPORATE PRINCIPLE

For that reason, it is not only our statutory duty but also our mission to comply with the laws and regulations as well as the internal standards that apply to our products. Our products are state of the art and are developed in accordance with legal requirements. This is monitored continually and systematically through processes and structures, as well as through product surveillance under real field conditions. We make no compromises on that. We ensure that suitable measures can be taken in good time in the event of any discrepancies.

MY CONTRIBUTION

If I notice or have concerns that our products could present a threat or that regulations are not being observed, I take counteraction.

I report the matter to my superior and to the relevant contacts in the Company, for example I address to the APS Committee.



EXAMPLE

A customer reports technical problems with a vehicle to you. You are not sure whether or not they are due to a mistake on the customer's part when operating the product, and you cannot definitively rule out a manufacturing or construction defect.

Clarify the matter. It is essential to ensure that our Company will solve a problem for which it is responsible. Even customer mistakes when operating the product may require the Company to respond (e.g. by modifying operating instructions or user training).

Environmental protection



BACKGROUND

Automobili Lamborghini develops, produces and distributes vehicles and services worldwide. Our Company's mission is to be a global provider of sustainable and individual mobility. In pursuing this mission, the Company is aware of its special responsibility toward the environment.

CORPORATE PRINCIPLE

As a commercial enterprise, we bear responsibility for the environmental compatibility and sustainability of our products, locations and services. We focus on environmentally friendly, advanced and efficient technologies, which we implement throughout the entire lifecycle of our products, in respect to the own peculiarities. Starting with the early phases of development and production, we make sure we manage natural resources carefully and steadily reduce the environmental impact to comply with environmental protection laws and regulations.

Furthermore, we constantly reassess the environmental compatibility of products and manufacturing processes, optimizing these where necessary. We are a responsible member of society and a partner for politics. We seek a dialog with these players on future mobility concepts and on shaping ecologically sustainable development.

MY CONTRIBUTION

I bear environmental protection in mind in my work and use resources and energy economically and efficiently. I make sure my activities have the smallest possible impact on the environment and that they comply with applicable environmental protection laws and regulations.

EXAMPLE

You notice that there is a leak in a tank and that significant amounts of chemicals are seeping into the ground. Immediately inform one of the employees responsible and draw attention to the problem.

Do not rely on somebody else reporting the leak.



Donations, sponsorships and charity



BACKGROUND

Automobili Lamborghini makes donations (contributions on a voluntary basis with no expectation of a consideration in return) and grants sponsorship monies (contributions based on a contractually agreed consideration) to achieve a positive impact in terms of our reputation and public perception. In order to avoid conflicts of interest and to ensure standard conduct within the Company, donations and sponsorship measures are permitted only in the context of the respective legal framework and in accordance with the applicable internal rules of Automobili Lamborghini and of Volkswagen Group.

CORPORATE PRINCIPLE

We make monetary donations and donations in kind to support science and research, education, charitable causes, sports, culture, churches and ecclesiastical institutions. We grant donations only to recognized non-profit organizations or organizations that are authorized by special provisions to accept donations.

The granting of donations and sponsorship measures is permitted only in accordance with a transparent approval process.

MY CONTRIBUTION

If I consider a particular sponsorship measure to be worthy of support, I make initial contact with the appropriate departments in the Company (e.g. Human Resources & Organization and Marketing).

The granting of donations must be transparent; the purpose, the recipient of the donation, and the donation receipt issued by the recipient must be documented and verifiable. I comply with internal processes and do not initiate any donation that could damage the reputation of our Company.

Communication and marketing



BACKGROUND

Automobili Lamborghini believes it is important to communicate clearly and openly with employees, business partners, the shareholder, investors, the media and other stakeholders using honest and lawful means. All our employees bear a responsibility to observe internal communication rules to ensure that we present a unified and consistent image of our Company.

All our employees recognize the achievements of those they engage with and respect their professional and personal reputation.

CORPORATE PRINCIPLE

We ensure that our communication is clear and consistent in order to maintain the confidence of customers, investors and other stakeholders. Before committing to and executing any planned communication or marketing measures, such measures must first be coordinated with the relevant departments.

MY CONTRIBUTION

I do not issue any public statement for my Company and always refer any requests to the Communication department. If I make any comments at public, trade or cultural events or on the Internet, I make it clear that I am voicing solely my own personal opinion. I consult the Company's social media guidelines for advice on proper conduct in social networks.

EXAMPLE

A local politician asks you, a successful Automobili Lamborghini employee, for a cash donation from the Company for the election campaign.

Turn down the request. Donations may be granted only after going through the required approval process. In this specific case, the donation cannot be approved because an internal guideline prohibits donations to political parties, party-affiliated institutions and politicians.

EXAMPLE

You read a comment on the Internet from someone who is critical of production methods but the points raised are entirely unfounded.

Even if you would like to correct the misrepresentation straightaway, contact Marketing and/or Communication Organizational Units, that will respond appropriately and comprehensively to such criticism.

Political lobbying



BACKGROUND

Politics and legislation exert an influence on the economic framework for business processes. Automobili Lamborghini's participation in commercial trade means that it also has an impact on society and could specifically promote its interests during decision-making processes, such as those for legislation plans, through political lobbying.

CORPORATE PRINCIPLE

Political lobbying can be conducted exclusively by the Managing Directors and in line with the principles of openness, accountability and responsibility.

It goes without saying that our interaction with political parties and interest groups is based on the principle of neutrality. Dishonestly influencing policymakers and government is not permitted.

MY CONTRIBUTION

I do not attempt to intervene in political decisions on behalf of the Company if I am not authorized to do so.

If I am authorized to do so, I observe the instructions given by the Managing Directors.

EXAMPLE

An acquaintance of yours is a member of parliament. You know that a legislation proposal that is important for Automobili Lamborghini is currently being discussed in parliament and you contemplate contacting your acquaintance to explain the Company's interests in connection with this proposal.

Do not approach your acquaintance about the issue. Political lobbying in the Company is held by the Managing Directors and must be conducted openly and transparently.



5 Our responsibility as a business partner

Integrity, transparency and fairness are key to creating credibility and trust in business practice.

That is why Automobili Lamborghini sets particularly great store by systematically implementing its legal framework, intragroup guidelines and corporate values, and by communicating them clearly. This also includes distributing our products and services exclusively through our authorized distribution partners.

Automobili Lamborghini's responsibility as a business partner specifically gives rise to the following principles:



Conflicts of interest

BACKGROUND

There is a potential conflict of interest if the private interests of one of our employees clash or could clash with the interests of Automobili Lamborghini.

Such a conflict of interest may arise particularly as a result of secondary employment. If an employee places his/her personal interests above those of the Company, it could damage the Company.

CORPORATE PRINCIPLE

We respect the personal interests and the private lives of our colleagues. However, it is important to us to avoid conflicts between private and business interests, or even the appearance of such a conflict.

All our decisions are made exclusively on the basis of objective criteria and we do not allow ourselves to be swayed by personal interests or relations.

EXAMPLE

Your boss asks you to review bids from several suppliers of plastic components. You discover that one of the most favorable bids is from the Company of a good friend.

Inform your superior of the situation and withdraw from the decision-making process to avoid any appearance of a conflict of interest.

MY CONTRIBUTION

I avoid even the appearance of any conflict of interest and disclose any apparent or actual conflicts of interest to the responsible of my department and Human Resources & Organization.

We jointly seek a solution that is not detrimental to the Company's interests.

Gifts, hospitality and invitations



BACKGROUND

Benefits in the form of gifts, hospitality and invitations are prevalent in business relationships. These benefits are not a cause for concern as long as they are within reason and do not contravene any internal or statutory rules.

However, if such benefits exceed what is reasonable and are misused to influence third parties, those involved may be liable to prosecution.

CORPORATE PRINCIPLE

Our internal guidelines on handling gifts, hospitality and invitations set out what benefits are appropriate and what steps must be taken when accepting and granting benefits.

MY CONTRIBUTION

I familiarize myself with the guidelines on handling gifts, hospitality and invitations, and strictly abide by them.

I check my conduct in this regard to see whether there may be any conflicts of interest or whether any could arise.

EXAMPLE

An employee of a supplier gives you a valuable birthday gift. Even if you are of the opinion that accepting this gift does not affect business relationships, the value of the gift should not exceed the value set out in the relevant internal guidelines on gifts. When in doubt, do not accept the gift. If you are concerned that rejecting the gift could be misconstrued, contact your superior and agree on a solution with him/her. When in doubt, the gift should be handed over to the Compliance Officer. The handover of the gift will be documented for your personal protection.

Prohibition of corruption



BACKGROUND

Corruption is a serious problem in commercial trade. It generates decisions based on improper grounds and prevents progress and innovation as well as distorting competition and damaging society.

Corruption is prohibited. It may incur fines for Automobili Lamborghini and sanctions under criminal law for the employees involved.

CORPORATE PRINCIPLE

The quality of products and services from our Company is the key to our success. Consequently, we do not tolerate corruption. We grant benefits to business partners, customers or other external third parties only within the permissible legal framework and in line with existing rules.

MY CONTRIBUTION

I never bribe others and I never accept a bribe, either directly or indirectly.

I take responsibility for informing myself by consulting the internal rules before I give or accept gifts, issue or accept invitations, or offer or receive hospitality.

If I receive any corruption-related tip-offs, I immediately inform one of the contacts listed in chapter 7.

EXAMPLE

You work for Automobili Lamborghini in sales and would like to outstrip this year's revenue target. You prepare a bid for a major contract where a potential customer has issued a call for tender. The relevant decision maker on the customer side offers to influence award of the contract in favor of your Company in return for an appropriate consideration.

This is corrupt behavior. Inform your superior and the appropriate Compliance Officer immediately.



Dealings with officials and holders of political office



BACKGROUND

Dealings with officials or holders of political office, governments, authorities and other public institutions often involve special statutory rules, any individual breach of which may have serious consequences and could permanently bar Automobili Lamborghini from public contract awards.

CORPORATE PRINCIPLE

Our contacts with officials and holders of political office are strictly in line with all laws and legislation as well as the relevant internal rules concerning the avoidance of conflicts of interest and corruption.

We do not make any «facilitation payments». Such payments are sums paid to officials to accelerate routine administration matters.

MY CONTRIBUTION

I am aware that particularly strict rules apply when dealing with public contract awarders and I familiarize myself with these rules.

My contact is my Chief Officer.



EXAMPLE

You know that an authority is planning a call for tender for a major contract. You consider asking the authority's employee responsible for the tender, who you know from a previous project, to design the tender in such a way that Automobili Lamborghini wins the contract.

Do not under any circumstances take any such action. Exerting this kind of influence would be illegal.

Prohibition of money laundering and terrorism financing



BACKGROUND

Laws against money laundering and terrorism financing are in place in almost all countries worldwide. Money laundering occurs when funds or other assets originating directly or indirectly from criminal offenses are put into circulation in the legal economy, making their source appear legal. Terrorism financing occurs when money or other resources is/are made available to commit criminal acts of terrorism or to support terrorist organizations.

Liability for money laundering does not require the person involved to be aware that money is being laundered through the legal transaction concerned or the transfer concerned. Inadvertent involvement in money laundering may already be sufficient grounds for serious penalties for everyone involved.

CORPORATE PRINCIPLE

We carefully check the identity of customers, business partners and other third parties with whom we wish to do business.

It is our declared aim to conduct business solely with reputable partners who operate in line with legal provisions and who use resources from legitimate sources.

We assign incoming payments to the corresponding services without delay and post them accordingly. We ensure transparent and open cash flows.

MY CONTRIBUTION

I take no action whatsoever that may violate money laundering provisions at home or abroad. I am vigilant and investigate any suspicious conduct on the part of customers, business partners and other third parties. If there is information providing sufficient grounds for suspicion, I immediately get in touch with Administration or one of the contacts listed in chapter 7.

I abide by all applicable provisions for recording and posting transactions and contracts within my area of responsibility in the accounting system.

EXAMPLE

One of Automobili Lamborghini's customers has overpaid and asks for the excess amount to be repaid by transferring it to an account held in Switzerland or by paying it in cash instead of via bank transfer to the original business account. Do not accept the suggestion readily. This kind of request requires an explanation. Ask the customer why the amount cannot be repaid in the same way it was originally paid. Seek advice from Administration.

Accounting and financial reporting



BACKGROUND

Automobili Lamborghini can build and retain the trust of the general public, its shareholder and contract partners only through proper accounting and correct financial reporting. Any irregularities may have serious consequences for the Company as well as for those responsible.

CORPORATE PRINCIPLE

We strictly comply with the statutory provisions for proper accounting and financial reporting. Transparency and correctness are our top priorities. To that end, we regularly inform our shareholder and Statutory Auditors Members of our financial position and business developments. We publish our periodic financial statements punctually in accordance with national and international accounting regulations.

MY CONTRIBUTION

I organize processes so that all business financial data can be entered into the accounting system correctly and promptly.

If I have any questions about the correct recording of data, I contact my superior or the appropriate Finance department.

EXAMPLE

You urgently need new equipment. However, the budget in your department for the current fiscal year has already been used up. You consider acquiring the equipment nevertheless and posting the cost in the next fiscal year when your budget is replenished. Refrain from taking such action. Entries must always be posted accurately according to the accounting standard of competence. Posting entries inaccurately may have serious consequences for the Company or individual employee.



Taxes and customs

BACKGROUND

Our global operations and the development of new markets mean that we must comply with a raft of different regulations relating to external trade, tax and customs law. Observing tax and customs regulations builds trust with customers, financial authorities and the general public.

Any irregularities can cause significant financial damage to Automobili Lamborghini and to the Group, also seriously impacting the reputation and having negative consequences for the employees responsible as well.

CORPORATE PRINCIPLE

We are aware of our social responsibility to meet our obligations with regard to taxes and customs, and we explicitly endorse compliance with national and international legislation.

MY CONTRIBUTION

I design internal structures and processes in such a manner as to ensure that the taxes and customs to be paid by Automobili Lamborghini are calculated correctly, promptly and in full, are disclosed in reporting, and are paid to the appropriate fiscal authorities.

If I have information concerning the infringement of tax and customs regulations in my area of responsibility, I undertake every action I can to prevent or stop this infringement. If that is not possible, I get in touch with the appropriate contact person in Finance, in particular I address to Administration and Tax.



EXAMPLE

You are responsible for entering certain business transactions, such as general overheads (maintenance expenses) and production costs, in the statutory financial statements. One project exceeds certain controlling parameters early in the financial year. You therefore receive instructions to make an entry under maintenance expenses even though the transaction unquestionably relates to an investment and must therefore be treated as capitalized production costs.

Post the entry in line with legal requirements. All business transactions must be correctly reported pursuant to the commercial law and tax regulations because these accounting records form the basis for tax returns. Accounting errors could therefore result in incorrect tax returns and lead to serious consequences under tax and customs law for the Company and the employees responsible.

Fair and free competition



BACKGROUND

Fair and free competition is protected by the applicable competition and antitrust legislation. Complying with this legislation ensures that market competition is not distorted – which is to the benefit and in the interest of all market players.

In particular, agreements and concerted practices between competitors intended to achieve or effect the prevention or restriction of free competition are prohibited. Abusing a dominant market position is also inadmissible. Such abuse can, for example, take the form of treating customers differently for no objective reason (discrimination), refusal to supply, imposing unreasonable purchase/selling prices and conditions, or unjustified tie-in arrangements for the requested additional service.

Anti-competitive conduct has the potential not only to significantly damage the Automobili Lamborghini and Group's good reputation, but also to incur severe fines and penalties.

CORPORATE PRINCIPLE

We conduct business solely on the basis of merit and market economy principles, as well as free and unhindered competition. We like to measure ourselves against our competitors, always abiding by rules and regulations and observing ethical principles.

We do not enter into any anti-competitive agreements with competitors, suppliers or customers.

If our Company holds a dominant market position, we do not abuse this position.

We comply with the specific antitrust provisions for distribution systems in our dealings with our authorized distribution partners.

MY CONTRIBUTION

Whenever I come into contact with competitors, I ensure that no information is imparted or received that allows conclusions to be drawn about the informer's current or future business conduct.

I avoid conversations or any other contact with competitors about issues that are important among the competition. Such issues include prices, pricing, business planning, development statuses and delivery times.



EXAMPLE

You talk to a competitor's employee at a trade fair. After a while, you notice you are being sounded out for information about Automobili Lamborghini's future business planning. In return, the employee offers to divulge the same information about his Company.

Immediately make it absolutely clear to the competitor's employee that you will not talk to him about such issues. This type of conversation – apart from the unauthorized disclosure of business secrets – is also a breach of prevailing competition and antitrust legislation and could have drastic consequences for you personally, Automobili Lamborghini, the Group, and both the competitor's employee and his Company. Document this conversation and inform Legal Services and the Compliance Officer immediately.

Procurement



BACKGROUND

Automobili Lamborghini is contractually bound to a large number of suppliers and service providers in its business operations.

CORPORATE PRINCIPLE

We carefully select suppliers and service providers based on objective criteria.

When purchasing products and services, we involve the appropriate Procurement department as laid down in the applicable procurement guidelines.

MY CONTRIBUTION

I show no bias in favor of a supplier or service provider without an objective reason, and I avoid any conflict of interest.

I do not purchase any products or services without first having looked at the market and alternative suppliers.

I follow the relevant procurement principles and involve the appropriate Procurement department at an early stage in the purchasing process.

Export control



BACKGROUND

Export control can impose prohibitions, restrictions, approvals from authorities or other monitoring measures on the cross-border exchange of goods.

These provisions under export control legislation apply to technologies and software as well as goods. Apart from exports per se, export controls may also apply to the temporary cross-border transfer of, for instance, objects and technical drawings taken on a business trip, or technical transmissions by e-mail or cloud.

Furthermore, any business with persons or companies named in sanctions lists is strictly prohibited, regardless of the delivery process.

CORPORATE PRINCIPLE

We comply with all provisions for importing and exporting goods, services and information.

MY CONTRIBUTION

When making a decision concerning the import or export of products and services, I consciously examine whether the decision may fall under export control.

When in doubt, I seek advice from Administration that deals with customs operations.

EXAMPLE

It comes to your attention that a Company's employee would like to commission a supplier without involving the appropriate Procurement department.

Notify one of the contacts listed in chapter 7 or the appropriate Procurement department to ensure that the bid that is most cost-effective for the Company has a chance.

EXAMPLE

You receive an inquiry from a potential customer wishing to place an order with Automobili Lamborghini to supply products in a country that Automobili Lamborghini has listed as an embargoed country.

Clarify the matter by asking to Administration (Import-Export) about export restrictions that apply to the country to be supplied and do not conclude any contracts that bind the Company to export to this country until the issue has been fully clarified.

Prohibition of insider trading



BACKGROUND

Legislation - in Europe, for example, particularly the Directive on Criminal Sanctions for Market Abuse (Market Abuse Directive) - prohibits the use or disclosure of inside information in the trading of shares, other securities or financial instruments. The same applies to recommending or inciting a third party to engage in insider trading and to the unlawful disclosure of inside information. Pertinent national legislation may stipulate further prohibitions. Inside information is information of a precise nature that has not been made public and that, if it were made public, would be likely to have a significant effect on the price of the relevant security (e.g. Group shares) or financial instrument.

CORPORATE PRINCIPLE

We handle information pertaining to share performance relevant to the Group's stock market in accordance with capital market requirements and do not tolerate any insider trading.

We may use knowledge relating to insider-relevant projects and processes only internally in accordance with the applicable intracompany rules and may not divulge such knowledge to any outside party, including family members.

MY CONTRIBUTION

I do not engage in insider trading nor do I make any such recommendations to any third party or incite any third party to engage in insider trading.

Furthermore, I do not divulge inside information unless this is required during the course of my normal work, and I comply with the relevant internal rules. I undertake to familiarize myself with the applicable internal rules.

If I have access to inside information, I do not purchase or sell any securities or financial instruments based on this information.

This applies not only to trading with shares of listed companies belonging to the Group's listed companies or derivatives thereof, but also to trading with securities or financial instruments in general (i.e. also those of suppliers).



EXAMPLE

You learn through your work with Automobili Lamborghini that the acquisition of a new business by the Group is going to be announced soon. You know that a very good friend is currently considering whether to sell his (Group) shares. Since the price of Group's shares will likely rise once acquisition of the new area of business has been announced, you consider telling your friend that he should hold off on selling his shares.

Do not tip your friend off under any circumstances. Since the information of which you are aware is not public, but inside knowledge of the Company and of the Group as well, you are not permitted under any circumstances to share this knowledge with others. Transmitting this knowledge directly or indirectly would make you liable to prosecution.

6 Our responsibility in the workplace

It is in the fundamental interests of Automobili Lamborghini to protect the health and safety of every employee.

The principle of protection and security also applies to employee and customer data as well as company-specific know-how and Company assets.

Automobili Lamborghini's responsibility in the workplace specifically gives rise to the following principles:



Occupational safety and healthcare

BACKGROUND

Automobili Lamborghini is committed to its responsibility for the safety and health of its employees.

We provide occupational safety and healthcare in line with the provisions of national regulations and with the occupational health and safety policy of the Company.

CORPORATE PRINCIPLE

We preserve and promote the health, performance and job satisfaction of our employees through continuous improvements in the working environment and a raft of preventive healthcare and health promotion measures.

MY CONTRIBUTION

I comply with the occupational health and safety rules. I never put the health and safety of my colleagues or business partners at risk. I take all appropriate and statutory precautions to ensure that my workplace always enables safe working.

I make an active contribution to maintaining and promoting my health by voluntarily participating in preventive healthcare and health promotion measures.



EXAMPLE

You notice that a machine in your department has an electronic fault.

Take the machine out of operation and make sure the «out of order» sign is clearly displayed and inform your responsible and Technical Services. Repairing electrical equipment yourself is not permitted and could be dangerous.

Data protection



BACKGROUND

There are special statutory rules to protect privacy when dealing with personal data.

As a general rule, collecting, storing, processing and other use of personal data require the consent of the person concerned or a contractual arrangement or on some other legal basis.

CORPORATE PRINCIPLE

We protect the personal data of employees, former employees, customers, suppliers and other affected parties, so called «data subject».

We collect, gather, process, use and store personal data strictly in accordance with legal provisions.

MY CONTRIBUTION

I ensure that personal data are collected, stored, processed or used in any other way only with the consent of the person concerned, under a contractual arrangement or some other legal basis.

All data processing tools must be secured in such a manner that the confidentiality, integrity, availability, verifiability and reliability of such sensitive data is guaranteed, and that unauthorized internal or external access is prevented.

When in doubt, I contact my superior or Legal Services or, as far as safety measures are concerned, IT.



EXAMPLE

You have organized a seminar for Automobili Lamborghini with external participants and receive personal data from the participants for it. A colleague asks you to pass the addresses on.

Do not pass this data on without consulting one of the contacts mentioned above. As a general rule, data may be used only for the purpose for which it was communicated.

Security and protection of information, know-how and intellectual property



BACKGROUND

Automobili Lamborghini holds internationally protected patents and also has extensive trade and business secrets in addition to technical know-how. This knowledge is the basis of our business success.

Unauthorized transmission of such knowledge may lead to extremely high losses for the Company and to consequences under labor, civil and criminal law for the employee concerned.

CORPORATE PRINCIPLE

We are aware of the value of Company know-how and take great care to protect it.

We respect the intellectual property of competitors, business partners and other third parties.

MY CONTRIBUTION

I handle all Automobili Lamborghini information carefully and do not disclose it to unauthorized persons.

I take particular care with regard to information relating to technical know-how, patents, and trade and business secrets.



EXAMPLE

You are involved in the development of an innovative technology. You are to present your development at various Company sites and want to take your laptop, on which the relevant documents are saved, with you for presentation purposes. You intend to go over these documents again on the plane or the train on the way to the individual sites.

Ensure that no one obtains knowledge of sensitive information belonging to Automobili Lamborghini, as this could lead to serious competitive disadvantages. Do not retrieve this type of information in places where third parties can access it or take note of it.

IT security



BACKGROUND

Information technology (IT) and electronic data processing (EDP) have become an integral part of everyday life at AutomobiliLamborghini.

At the same time, they involve numerous risks, foremost of which are impairment of data processing as a result of malware (viruses), loss of data due to program errors, and data misuse (e.g. due to hackers).

CORPORATE PRINCIPLE

We respect IT and EDP security and abide by the applicable regulations.

MY CONTRIBUTION

I familiarize myself with the applicable IT security regulations and observe the rules contained therein.

I am aware that unencrypted data exchange (e.g. by e-mail or USB stick) is not a secure means of communication.



EXAMPLE

You are out of the office and are given a USB stick in order to exchange a document at a meeting.

Use only Automobili Lamborghini data carriers or data exchange systems and proceed according to the guidelines for information classification.

Arrange for the document to be e-mailed to you, for example. Never open e-mails or attachments that appear to be suspicious or that come from unknown e-mail addresses. That is how you prevent malware from entering the Company network.

Handling Company assets



BACKGROUND

Automobili Lamborghini's tangible and intangible assets serve to help our employees achieve the Company's business objectives and may be used only for business purposes.

CORPORATE PRINCIPLE

We respect the Company's tangible and intangible assets and do not use them for non-business purposes.

MY CONTRIBUTION

I adhere to the Company's rules and exercise care when handling Company assets.



EXAMPLE

Your soccer club is planning a weekend trip. The trainer asks whether you, as a Automobili Lamborghini employee, can «organize» a vehicle from the Company fleet.

Company vehicles can only be used if assigned or for business reasons (e.g. travel). Therefore, third parties or employees are not permitted to use a corporate car for private purposes.

If needed, internal and external points of contact provide support in dealing with the Ethic Code.

Further information on the irregularities reporting system and the Independent Body can be found at <https://www.lamborghini.com/en-en/company>.

Employee representation

We recognize the basic right of all employees to establish trade unions and employee representations. We are committed to working with employee representatives in candor and trust, to conducting a constructive and cooperative dialogue, and to striving for a fair balance of interests. Professional dealings with employee representatives that do not allow either privilege or discrimination are part of our corporate culture.

Safeguarding the future of Automobili Lamborghini and its employees is achieved in a spirit of cooperative conflict management and social commitment, on the basis and with the goal of ensuring economic and technological competitiveness. Economic viability and jobs are equal and shared goals.

Help/Contacts/Whistleblower System

The Volkswagen Group Code of Conduct brings together the Group's core ethical values and its expectations with regard to compliant behavior on the part of employees. Together, we protect our company by speaking up when something is not right. If we have any questions or are not sure about something, or if we suspect violations of internal or external regulations, we talk to our supervisor and seek advice from the competent bodies. The HR department and employee representatives are there to provide support. In addition, we can mail our questions to the company's Compliance Officer or the Compliance consultation at any time: compliance@lamborghini.com.

Furthermore, we can report hints regarding Regulatory Violations via the Volkswagen Group Whistleblower System, for example if we do not want to contact our supervisor. We also have the opportunity to report hints anonymously. We are aware that the Volkswagen Group Whistleblower System has responsibility for investigation especially of hints regarding Serious Regulatory Violations.

A Serious Regulatory Violation is a significant violation of our core ethical values, as set out in the Code of Conduct. Likewise, violations of statutory laws or regulations that may significantly affect the reputation or other interests of the company also constitute Serious Regulatory Violations.

Members of management act as role models, follow up misconduct and advocate correct ethical conduct. In the event of Reasonable Suspicion of a Serious Regulatory Violation, they are obliged to report their suspicion immediately. Failure to report constitutes a Serious Regulatory Violation and will be disciplined accordingly.

The purpose of the Whistleblower System is to protect our company, whistleblowers as well as all persons who contribute to the investigation and to put an end to misconduct and Regulatory Violations. Retaliation against them constitutes a Serious Regulatory Violation.

At the same time the Whistleblower System preserves the interests of Persons Implicated. For them, the presumption of innocence applies as long as a violation is not proven. The system is founded on uniform processes and the confidential, professional processing of hints. Consequently, an investigation will only be initiated if there is Reasonable Suspicion of a Serious Regulatory Violation. Any deliberate use of the Whistleblower System will not be tolerated and will be disciplined accordingly.

We can access the Whistleblower System through the following channels:

Contact details for the Audi Investigation Office:

Postal address:

AUDI AG - Whistleblower System
85045 Ingolstadt

24/7 hotline:

+800 444 46300 / +49 5361 946300

E-mail: whistleblower-office@audi.de

Online reporting channel (this channel can also be used to make anonymous reports):

<https://www.bkms-system.com/audi>

In addition, experienced external lawyers act for us as neutral mediators (ombudspersons). As legal counsel, they are tasked with receiving reports about possible infringements of laws, internal rules or other conduct damaging to the Volkswagen Group. If necessary, and if the identity of the whistleblower is known, they make direct contact with the whistleblower should they require feedback. Once the preparations are complete, the ombudspersons forward all information agreed with the whistleblower - anonymously if the whistleblower so wishes - to our Whistleblower System for further processing.

Contact details for the ombudspersons:

Internet:

<http://www.ombudsmen-of-volkswagen.com/>

Further information on the Whistleblower System and the ombudspersons of the Volkswagen Group is available on the internet at <https://www.audi.com/en/company/integrity-compliance-and-risk-management/whistleblower-system.html>

Additional contact point for queries or alerts is the **Independent Body** of Lamborghini:

- odv@lamborghini.com
- odv-anonymous@lamborghini.com

Mailing address: Automobili Lamborghini S.p.A. Independent Body - Via Modena n. 12 - 40019 - Sant' Agata Bolognese -BO (Italy).

Self-test for decision guidance



If at any time I am unsure whether my behavior complies with the principles set out in our Ethic Code, I should ask myself the following questions:

- 1. Did I take all relevant matters into consideration and weigh them properly? (content test)**
- 2. Am I confident that my decision is within the constraints of legal and company requirements? (legality test)**
- 3. Do I stand by my decision when it is revealed? (supervisor test)**
- 4. Am I in favor of all such cases being decided the same way company-wide? (universality test)**
- 5. Do I still think my decision is right when my Company has to justify it in public? (public test)**
- 6. Would I accept my own decision if I were affected? (involvement test)**
- 7. What would my family say about my decision? (second opinion)**

If my answer to questions 1-6 is «yes» and the answer to question 7 is positive, my behavior is very likely to be compliant with our principles. If questions remain unanswered or if I have any doubts, I should get in touch with any of the points of contact listed in this chapter.



THE ETHIC CODE GUIDES US!

Last update July 2022.

VOLKSWAGEN

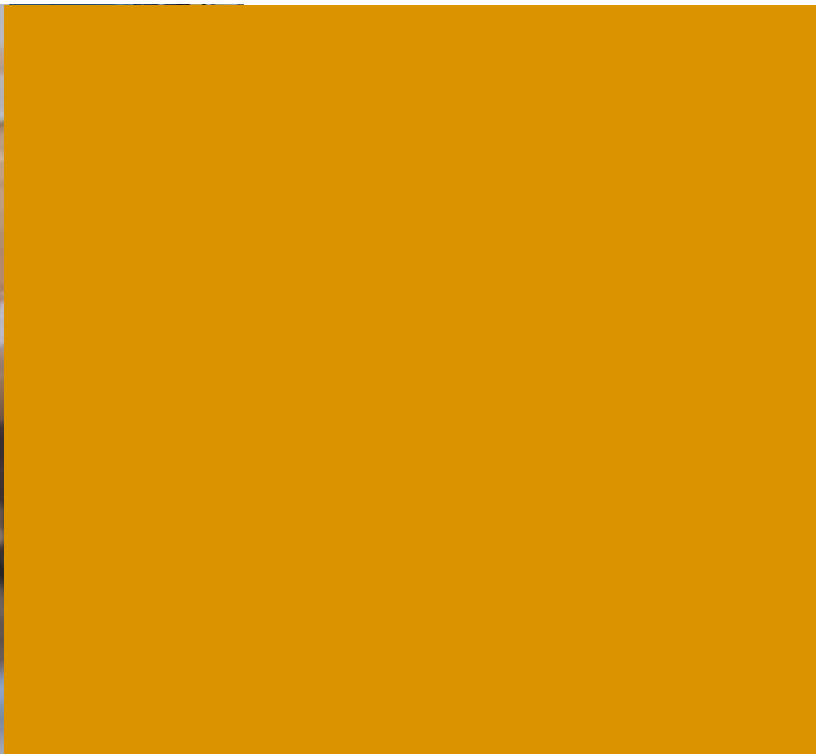
AKTIENGESELLSCHAFT



**Declaration by the Volkswagen Group on social rights,
industrial relations and business and human rights**

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Preamble

The Volkswagen Group anchors fundamental social rights and principles with this declaration as part of its corporate policy . The proactive management of current global challenges is a decisive factor for the Volkswagen Group in safeguarding international competitiveness and a prerequisite for ensuring good working conditions.

The Volkswagen Group is committed to fulfilling the social responsibilities that accompany its status as a global company. Recognizing that sustained economic success is only possible if ecological and, above all, social issues are taken into account at the same time, the Volkswagen Group and its employees address the associated challenges collectively. Safeguarding the future of the Volkswagen Group together with its workforce takes place in a spirit of cooperative conflict management and social commitment based on and with the goal of ensuring economic and technological competitiveness. Economic efficiency and job protection are equal-ranking and shared goals.

The Volkswagen Group is especially committed to its corporate human rights responsibilities and acknowledges the following international conventions and declarations while also reaffirming its support for the associated contents and principles. These include:

- The Universal Declaration of Human Rights, codified in particular in the International Covenant on Civil and Political Rights and in the International Covenant on Economic, Social and Cultural Rights (in addition to other applicable human rights treaties under international law, for example the UN Convention on the Rights of the Child)
- The ILO core labor standards¹
- Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the ILO
- The ten principles of the UN Global Compact
- The UN Guiding Principles on Business and Human Rights,
- The OECD Guidelines for Multinational Enterprises

This declaration explicitly highlights principles of central importance for shaping our corporate responsibility, especially our duty of diligence with respect to human rights. This includes the international standards mentioned above as well as respective national laws. Furthermore, the Volkswagen Group proactively advocates the promotion of human rights, primarily in the context of social projects with human rights relevance.

This declaration provides a binding basis for social and industrial relations within the Volkswagen Group.² It also serves as a benchmark for shaping relationships with suppliers and other business partners. The resulting requirements, expectations and escalation mechanisms are defined and enshrined in special business processes in accordance with the guidelines for implementing this declaration. The specific expectations regarding suppliers arising from this declaration are defined in the Code of Conduct for Business Partners. This policy must be recognized by all suppliers prior to the commencement of the business relationship.

This declaration likewise forms the basis for dialog with further internal and external stakeholders as well as local communities in the business proximity and environment.

To improve readability, the male form of address is sometimes used throughout the text. All genders are addressed equally in this respect. The shortened language form is for editorial reasons and is entirely without prejudice.

¹ ILO core labor standards C29, C87, C98, C100, C105, C111, C138 and C182.

² Other important Group-wide principles and rules, for example relating to labor relations, safety and health at work, temporary work and vocational education, can be found in separate charters. They apply to the countries and companies represented in the EKBR/WKBR.

Scope

The Volkswagen Group, the Volkswagen Group European Works Council and the Volkswagen Group Global Works Council (EKBR / WKBR) adopt this declaration on behalf of Volkswagen AG and on behalf of controlled affiliated group companies of Volkswagen AG.³

Volkswagen strives to promote the same principles and objectives in companies in which the Volkswagen Group has an interest, but which are not affiliated group companies.

The principles and objectives set out below are realized with due regard for and in compliance with the applicable laws in the different countries and locations. In cases where national requirements fall short of the self-imposed standards, the Volkswagen Group promotes the advancement of the following principles and objectives.



³ Controlled Entities within Volkswagen Group are all direct or indirect controlled entities. This applies for the following: (1) Volkswagen AG or by Volkswagen AG controlled entities hold more than 50% of shares or the share capital of the entity or (2) Volkswagen AG can execute more than 50% of the voting rights in committees or the executive body of the entity based on effective shareholders agreements (e.g. voting agreements) and regulations (e.g. articles of association).

Principles and objectives

Freedom of association and collective bargaining

The Volkswagen Group recognizes the basic right of all employees to establish and join unions and employee representations.⁴ In this context, the Volkswagen Group commits itself to safeguarding neutrality. This precludes any form of discrimination based on union activities.⁵

If this basic right is constrained by local laws, alternative and lawful possibilities to establish employee representation shall be fostered.

The Volkswagen Group recognizes the right to collective bargaining.⁶ The Volkswagen Group and unions and/or employee representations engage collectively in social dialog. Thereby collective bargaining is a special expression of this social dialog.

The Volkswagen Group respects the right to strike insofar as this right is exercised in accordance with the respective national legal systems.

No forced labor

The Volkswagen Group rejects forced labor and all forms of modern slavery including human trafficking.⁷ This includes, in particular, work carried out involuntarily by people due to intimidation, penalty or threat of being disadvantaged (e.g. debt slavery or involuntary prison labor). Employment relationships are based on voluntary participation and can be terminated at any time by the employees of their own free will and within a reasonable period of notice.



No discrimination and no harassment

The Volkswagen Group rejects all forms of discrimination, harassment or unwarranted disadvantage. This applies, in particular, to discrimination due to ethnic or social origin, skin color, gender, nationality, language, religion, physical or mental limitations, gender identity, sexual orientation, health status, age, marital status, pregnancy / parenthood, union membership or political persuasion, insofar as this is based on democratic principles and tolerance towards differently minded persons.⁸ The Volkswagen Group is committed to equal opportunities and equal treatment and promotes an atmosphere of mutual respect and diversity in which employees are chosen, hired and promoted only based on their suitability, qualifications and abilities. The Volkswagen Group is committed to ensuring a healthy work-life balance and fulfills the requirements to achieve this.

The Volkswagen Group is committed to cultural diversity and respects the rights of ethnic, religious or comparable minorities and promotes teamwork characterized by mutual respect.

The Volkswagen Group respects and protects the rights of vulnerable groups, such as expectant mothers, people with disabilities, migrants, elderly employees as well as indigenous peoples.

The Volkswagen Group does not tolerate any form of harassment, either sexual or moral. This applies, in particular, to violence and harassment in the working environment, which occurs during, in relation to or as a result of work being carried out.⁹

The signatories are therefore of the opinion that preventing and prohibiting such behavior using suitable measures is imperative and a prerequisite for ensuring well-being at work.

⁴ ILO Convention 87.

⁵ ILO Convention 135.

⁶ ILO Convention 98.

⁷ ILO Conventions 29 and 105.

⁸ ILO Convention 111.

⁹ ILO Convention 190.



No child labor and protection of young workers

Child labor is prohibited.

The minimum age for acceptance for employment is determined according to the standards of the International Labor Organization and the requirements for prohibition of hazardous child labor.¹⁰

Compensation and benefits

The compensation and benefits paid or received for a normal work week correspond at least to the legally valid and guaranteed national minimum. In case 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.

The Volkswagen Group recognizes the principle of equal pay for work of equal value, especially between different genders.¹¹

Work hours

The Volkswagen Group recognizes the principle that work hours must correspond at least to the respective national legal requirements or to the minimum standards of the respective national economic sectors. The Volkswagen Group promotes social and societal dialog where possible based on collective bargaining in order to ensure that work hours are humane and compatible with health.

Occupational, health and fire safety and environmental protection

The Volkswagen Group recognizes the importance of occupational, health and fire safety and environmental protection and is committed to creating a safe working environment and ensuring healthy employment conditions in accordance with applicable international standards. In this respect, it ensures occupational, health and fire safety at the workplace at no cost for employees at least in the context of the relevant national regulations and in harmony with the requirements of the corresponding Compliance Management System. The Volkswagen Group will take appropriate (eg. technical, organizational or personal) protective measures in this respect and ensure as well as track their compliance and continuous enhancement using the existing management systems and in cooperation with the social partners. The same applies to corporate environmental protection measures. In its environmental mission statement and policy, the Volkswagen Group commits itself to environmentally compatible actions and prudent use of resources in all of its activities.

Protection of confidential information

The Volkswagen Group is committed to protecting personal data and protecting confidential information. At the same time, the Volkswagen Group is aware of the major importance of data, for example for digital business models. At the same time, this implies responsible use of data.

The collection, storage, processing and other use of personal data requires the consent of the data subject, a contractual regulation or some other legal basis.

¹⁰ ILO Conventions 138 and 182.

¹¹ ILO Convention 100

Protecting the freedom of conscience, expression and religion

The Volkswagen Group respects the right to freedom of conscience, expression and religion. In cases where these rights are subject to state restrictions, it advocates societal dialog.

Protection of bodily integrity, ban on torture

The Volkswagen Group considers that the protection of bodily integrity is of primary importance and uses appropriate measures in a company context and as part of its duty of care to ensure adequate safeguarding of this legally protected right.

The Volkswagen Group acknowledges its past and its historical responsibility and respects international human rights in this context.

Any involvement including complicity or involvement in kidnappings, torture, killings or such acts is strictly repudiated.

Use of management systems for implementing this declaration

The observance and realization of the principles and objectives set out in this declaration are tracked by using the existing and risk-exposure-driven compliance management systems, which are benchmarked in regard to recognized standards.

The content-based design and orientation of these existing management systems are described in greater detail in dedicated guidelines for implementing this declaration. The local implementation is tasked to the regionally responsible employee at the respective site.

Within the Volkswagen Group, respective measures for the implementation of this declaration are derived from applicable laws and company rules in close collaboration with the employee representations. In particular, this applies to measures involving training and communication.

The signatories affirm their commitment to continually monitor the compliance with this declaration and evaluation of its application. This shall happen at least once a year during the meeting of the Volkswagen Group European Works Council and the Volkswagen Group Global Works Council (EKBR / WKBR). The right of local employee representations to call on local management to initiate this evaluation during the course of the year shall hereby not be infringed.

Wolfsburg, November 27, 2020

for the Volkswagen Group
European Works Council and
Group Global Works Council



Final provisions

Upon signature, this declaration enters into force and replaces the previous „Declaration on social rights and industrial relations at Volkswagen“ as amended 11 May 2012. No individual or third-party rights can be derived from this declaration.

This declaration has no retroactive effects.

This declaration will be reevaluated regularly during the meetings of the Volkswagen Group European Works Council and the Volkswagen Group Global Works Council to determine a need for modification and can be adjusted in mutual agreement. Should any provision of this declaration be legally invalid, the parties agree to establish a new provision that approximates the invalid provision as closely as possible.

In case of ambiguity regarding the interpretation or application of this declaration, the German version prevails. The signatories agree to consult each other in this occurrence. The declaration must be appropriately communicated by the signing parties within their respective area of responsibility immediately following the signing of the declaration.

for the Volkswagen
Group Management

Guidelines for implementing the Declaration in Automobili Lamborghini

In order to ensure compliance with the "Declaration by the Volkswagen Group on social rights, industrial relations and business and human rights" (hereinafter: Declaration) in day-to-day business, appropriate measures will be defined within the framework of the applicable laws and company regulations in close collaboration between the Volkswagen Group, the Volkswagen Group European Works Council and the Volkswagen Group Global Works Council including definition of clear responsibilities, internal regulations and where needed, improvement of existing processes. Accordingly, and in line with this, the procedure is carried out at AUDI AG by those responsible within the company and in the General Works Council; in Automobili Lamborghini by those responsible locally and the employee representatives, where applicable. The Volkswagen Group and the Audi brand group use the existing Compliance Management System (CMS) for implementing business & human rights due diligence¹. Other relevant documents include the Lamborghini Ethic Code, the Code of Conduct for Business Partners, and other internal Group regulations².

The "Business and Human Rights" department at Volkswagen AG is responsible for this subject area and for its coordination within the Volkswagen Group. Insofar as employees and/or internal processes in the Human Resources division are affected, this is done in consultation with Group Human Resources Policy and Standards. In Automobili Lamborghini, the topic is managed by a dedicated team composed by Compliance, Human Resources, Procurement and Sustainability Organization. The responsible individuals at each site are responsible for local implementation and will report accordingly to the respective Audi Group functions. They are supported in an advisory capacity both centrally and decentrally by the respective specialist areas (in particular Human Resources, Procurement, Corporate Responsibility and Integrity and Legal Affairs) and by employee representatives.

Regular site inspections are also carried out using a risk-based approach. Risk analyses of supplier relationships and relationships with other business partners serve as a means of establishing actual and potential adverse impact on human rights. For example, in the case of on-site checks as part of the sustainability review of suppliers (S-rating)³, this includes consultation with potentially affected parties or their representatives.

In addition, further preventive measures (e.g. training for employees and suppliers in the form of awareness-raising measures, adaptation of management systems or stakeholder dialogs) are also being taken. Reporting on the topic "Business & Human Rights" at Volkswagen AG is the joint responsibility of the Group "Business & Human Rights" coordination (AUDI AG: Compliance Department) and with Group Sustainability (AUDI AG: Corporate Responsibility).

The early warning system serves to identify risks and problems in the supply chain for the Audi Group on a forward-looking basis. The system makes use among other things of internal information within the Volkswagen Group and within Automobili Lamborghini. If Automobili Lamborghini become aware of sustainability violations at or by business partners, have to pass all relevant information to "Procurement Strategy" (I/BB) at: s-rating@audi.de.

In the case of regulatory violations that are committed by Automobili Lamborghini employees in the context of business relationships, Group Policy Whistleblower System applies via the Audi Whistleblower System channels, e.g. via whistleblower-office@audi.de⁴, via the ombudspersons or through employee representatives. Suspected violations of the Code of Conduct for Business Partners by Audi suppliers can be reported through the channel speakup.supplychain@audi.de.

The Social Charta (i.e. Declaration) is disseminated to internal and external stakeholders, e.g. through publication on the intranet or on our corporate website. Those who are centrally responsible for implementing the Social Charter are informed and trained separately.

Sant'Agata Bolognese, November 23rd, 2021

Stephan Winkelmann
Chairman & Chief Executive Officer



Umberto Tossini
Chief Human Capital Officer



¹ See "Declaration by the Volkswagen Group on social rights, industrial relations and business and human rights," p. 4.

² [Lamborghini Code of Ethics is published at the internet page www.lamborghini.com](https://www.lamborghini.com) as well as the Code of Conduct for Business Partners.

³ <https://www.audi.com/en/company/sustainability/s-rating.html>

⁴ [Audi Whistleblowing System](#)