



## Slavery and Human Trafficking Statement – Ducati Motor Holding S.p.A. (fiscal year 2025)

This statement has been prepared pursuant to Section 54 of the United Kingdom Modern Slavery Act 2015. In particular, it represents the measures implemented by Ducati to prevent forms of modern slavery and human trafficking.

### Preamble

We are aware of our responsibility to uphold human rights at our sites as well as in our complex value and supply chains. For us, this responsibility does not end at our factory gates but goes beyond them.

### 1. Organization and supply chain

Ducati Motor Holding S.p.A. (“Ducati”) is a Company under Italian law, with headquarters in Bologna, Italy. The Ducati Group and its products are present in all relevant two-wheeled motorcycle markets around the world. The procurement structures ensure that production materials, capex and also services are sourced globally in the required quality and on the best possible terms.

For us, global observance of sustainability standards in such areas as human rights, occupational health and safety, environmental protection and anti-corruption form the basis for successful business with our suppliers. Only by working with our Business Partners are we able to make sure that sustainability standards are observed. We currently purchase products, services and parts from approx. 30 countries worldwide.

Ducati being part of the Volkswagen Group also amplifies its impact in this field. With its presence in key markets, the Volkswagen Group’s global procurement organization ensures that materials and services in particular are procured and provided worldwide, in the required quality and at the best possible condition. The competitive advantages of the various procurement markets are utilized by the whole Group as a result of the brands’ networking of the various procurement organizations. The VW Group currently purchase products, services and parts from approx. 100 countries worldwide.

For the Volkswagen Group, to which Ducati belongs, global compliance with sustainability standards in areas such as human rights, occupational health and safety, environmental protection and anti-corruption, is a basic prerequisite for successful business activities with our internal suppliers.

Only together with our business partners is it possible to ensure compliance with sustainability standards and contribute to the implementation of the United Nations Sustainable Development Goals (SDGs). To achieve these goals, we implemented the concept of “Responsible Supply Chain Management” and we continue to build on and develop these measures to this day. In addition to the independent activities undertaken in that area, all the actions taken and efforts made by the Volkswagen Group in promoting sustainability as well as in protecting and respecting human rights in the company and along the supply chain thus contribute to the attainment of these objectives at Audi as well.

The measures and efforts undertaken by the Volkswagen Group to promote sustainability and to safeguard and respect human rights within the Group companies and in the supply chain also contribute to achieving these goals.

### 2. Management approach

The topic of “Business and Human Rights” is integrated into the existing Compliance Management System (CMS). At Ducati, the central coordination of those responsible in other organizational units on the topic of “Business and Human Rights” is steered by Integrity, Compliance and Risk Management unit, including the implementation of the relevant requirements of the Supply Chain Due Diligence Act (LkSG) and looking forward to the EU Corporate Sustainability Due Diligence Directive (CSDDD).



As of January 1, 2023, the Board of Management of AUDI AG has appointed a Human Rights Officer (HRO) for the Audi Brand Group, to which Ducati belongs. In this independent function, he is the first point of contact for all human rights-related concerns on the part of the authorities, politics and society. One of its main tasks is to monitor the appropriateness and effectiveness of risk management for compliance with the due diligence obligations under the LkSG and to carry out risk-based control measures. In his function, he reports directly to the Board of Management of AUDI AG.

Combating modern slavery along our value and supply chain is a focus of our activities in the field of "Business and Human Rights". In particular, child labor and forced labor are serious human violations of human rights and are therefore prohibited. We align our action with the principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the requirements of the International Labor Organization (ILO). We set out broad understanding of "Business & Human Rights" on the [Ducati website](#).

This understanding as well as our commitment to our corporate responsibility, which is based on internationally recognized conventions and explicitly on the UN Guiding Principles on Business and Human Rights, has been demonstrated by Volkswagen Group and thus also by Ducati in the "Declaration of the Volkswagen Group on Social Rights, Industrial Relations and Business and Human Rights", the so-called Social Charta expanded and reaffirmed.

In particular, on the subject of "no forced labor" it says: "The Volkswagen Group rejects forced labor and all forms of modern slavery including human trafficking. 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".

In addition to the coordination within our Group itself, the VW Group also focused in 2025 on cooperation with external stakeholders.

The VW Group supports the National Action Plan (NAP) "Business and Human Rights" of the German Federal Government. In this context, the Group has been actively participating in the automotive industry dialogue under the aegis of the German Federal Ministry of Labour and Social Affairs (BMAS) since 2020. One of the goals was the joint development of implementation-oriented industry-specific guidelines for action, which are published on the BMAS website.

The VW Group will continue to engage in this dialogue with representatives of trade unions, NGOs, science, politics and business in 2026 away. Fighting Modern Slavery and forced labour also plays an important role within our Group.

Furthermore, the VW Group proactively seek dialogue with external stakeholders on the subject of human rights and exchange within the framework of working groups or initiatives, such as the DICO working group "Human Rights in Companies" or the Forum Compliance and Integrity.

On the basis of the exchange with experts and stakeholders, we as part of the VW Group can further develop our commitment in order to live up to our corporate responsibility for human rights even better.

## **Code of Conduct of Ducati**

The Ducati Code of Conduct is the ethical and value-based foundation for acting with integrity and in accordance with the rules of the Volkswagen Group, to which Ducati belongs. The VW Code of Conduct is a binding guideline for all employees in all brands and companies worldwide.

The focus is on the rule-compliant and ethical behaviour of employees as well as the responsibility of the Company as a Business Partner and member of society. Respect for the worldwide regulations for the protection of human and children's rights is anchored in the Code of Conduct, as it is the rejection of any kind of child, forced and compulsory labour as well as any form of modern slavery and human trafficking.

The Code of Conduct is a binding guideline for conduct in accordance with the rules and sets out the essential principles for the day-to-day work of Ducati. It is permanently available to all employees on the intranet and



to third parties on the Ducati website. The meaning and content of the Code of Conduct are communicated to employees as part of internal communication and a mandatory web-based training (WBT) module, and its receipt is confirmed when the employment contract is signed.

Its importance is continuously communicated proactively and systematically. For example, the Ducati Chief Executive Officer, in one with the DMH Board of Management members and the Ducati Chief Compliance Officer express their commitment for compliance and integrity. Department specific meetings and company-wide dialogue events also strengthen the so-called "tone from the top" and "tone from the middle".

All employees with a permanent employment contract, managers and Board of Management members inside of Ducati Motor Holding S.p.A. are trained on the principles of conduct at regular intervals. The corresponding WBT is kept updated according to VW Group standards. This part of a standard process as part of the CMS. Board of Management members and executives from the upper management circle (OMK) complete a biennial Code of Conduct certification. In this way, this group of people once again confirms their responsibility and role model function in the context of the Code of Conduct.

For its Business Partner, Ducati has also formulated the Code of Conduct for Business Partners and anchored it as binding part of the contract. It specifies the Group's expectations for the attitude and behaviour of the internal Business Partner, in particular the inside Suppliers and the inside Sales Partners. These requirements for the Business Partners inside business activities are therefore also the basis for successfully shaping the business relationship between Ducati and its internal Business Partners.

### **AUDI Statement of Principle on Respect for and Observance of Human Rights**

In order to affirm the commitment of AUDI to respecting and upholding human rights in general and condemning forced labor and human trafficking specifically, the AUDI AG Board of Management signed a "Statement of Principle on Respect for and Observance of Human Rights" in 2017.

The Statement of Principle updated in 2025, which also contains the Audi human rights strategy, documents the commitment of AUDI AG to respecting and observing human rights. As Ducati falls under the responsibility of the AUDI HRO, the said Statement of Principle is considered also relevant for Ducati.

### **The Ducati Independent Body and the Organizational and Management Model pursuant to the Italian Legislative Decree no. 231/2001**

Ducati employees, Business Partners and other Third Parties are provided with internal contact points as well as external Ombudspersons in order to be able to report on legal and regulatory violations as provided by the Italian Legislative Decree no. 231/2001.

The Company, to ensure the legality, correctness and transparency in the management of its business and its activities, has adopted the Organizational and Management Model pursuant to the above-mentioned Legislative Decree no. 231/2001 as a set of rules and procedures in order to prevent the commission of the different type of crimes provided for in such Decree and considered as relevant for the Company.

In particular, the Company has evaluated the risk of commission of the crimes provided for in Art. 25-quinquies of the Decree that are those that could lead or help the finding of worker in condition of slavery, for example through the human trafficking. In addition, the Company has also evaluated the risk of commission of the crimes provided for in Art. 25-duodecies of the Decree on the Employment of third-country nationals whose stay in the country is irregular, on the facilitation of the clandestine entry of foreigners and their illegal permanence in the country, as well as the risk of commission of the crimes provided for in Art. 25-septies on health and safety at work. Therefore, expected behaviors towards employees and Business Partners are defined for running business ethically and not tolerate modern slavery.

Every subject that acts in the name and on behalf of the Company, who during his/her activities become aware of information related to the commission of the relevant crimes within the Company or of practice not



in compliance with the rules of conduct and the provision of the Code of Conduct, is obliged to timely inform the Company via the Whistleblower channels.

### **The Whistleblower System of the Ducati Group**

The Whistleblower System (WBS) is the point of contact for reporting suspected potential regulatory violations by employees.

This includes, for example, violations of human rights, a situation in which there is generally a "serious regulatory violation". Employees, as well as Business Partners and clients worldwide, have the opportunity to report suspicions of misconduct by employees inside of the Ducati Group via various channels. In addition to the e-mail inbox setup and the regular postal service, there is also the option of reporting regulatory violations 365 days a year in several languages via a protected online report channel, via a voice message by telephone and via the "Speak Up" app. In addition, there is the option to send the message via external lawyers commissioned by the Volkswagen Group (Ombudspersons) to be submitted. If desired, reports can be made anonymously, in particular, via the online reporting channel (with the possibility of consultation with the Whistleblowers).

Strict confidentiality and secrecy apply throughout the process. The Whistleblower System guarantees the highest possible protection for whistleblowers and all people involved in the investigation and remedying of misconduct and violation of the rules. Discrimination against Whistleblowers and WBS facilitators is generally a serious regulatory violation and will not be tolerated. At the same time, the Whistleblower System safeguards the interest of those affected. The presumption of innocence applies as long as a violation is not proven.

The processes for the Whistleblower System have been reviewed again with regard to the requirements of the LkSG and, where necessary, adapted.

### **Risk analysis**

The Risk Management processes established in Ducati deal with acute operational risks within the framework of the quarterly risk process (QRP) as well as process systematic risks within the framework of the Standard Internal Control System (ICS). The QRP and the ICS are applied at Ducati Motor Holding S.p.A. while a simplified QRP outside the system is established within the Ducati group companies, the annual GRC control process at the remaining major holding companies. In the processes, risk assessments on the subject of human rights can be carried out by the main Business Units and companies. In addition, the countermeasures taken and control activities are reported.

In the standard ICS regular process, control requirements are set for compliance with legal and internal requirements on human rights and these are as well checked for effectiveness. Within the annual GRC regulatory process, the recording of risks is supported by a catalogue of risk topics, which also includes potential risks of human rights violations.

Reporting to the Board of Management of Ducati is carried out at least annually as well as on an ad hoc basis. Ducati has integrated business and human rights into its existing Compliance Management System and is guided by the requirements of the United Nations for corporate due diligence for human rights. This includes, for example, advising other business units on human rights issues or ad hoc cases. In addition, in 2019, a cross-departmental working group in Group Compliance of the Volkswagen Group developed and implemented a concept for determining the risk exposure for controlled investment companies: the risk exposure resulted from a correlation of country risks and business model risks in the area of "Business and Human Rights".

Based on this, measures were also defined and adapted for the Ducati Group companies in preparation for the German Supply Chain Due Diligence Act (LkSG).



For the annual implementation, lessons learned from previous years are taken into account, and the process is continuously reviewed and adjusted. An abstract risk analysis was also carried out in 2025 at AUDI AG and the Audi brand group companies, including Ducati, that are the focus of the "own business area" in accordance with the LkSG. To this end, the risk environment of the brand group companies was determined and categorized as low, medium or high. This was based on a calculation of the following four risk factors: the country risk of the location, the business model, the number of employees and gross revenue. The risk environment serves the specialist functions as a guide for their concrete risk analysis. The concrete risk analysis was conducted, evaluated and prioritized by the specialist areas responsible for the legal positions, such as HR Compliance, Occupational Health and Safety, Corporate Security, Environmental Protection, Real Estate and Material Conformity. Where risks were identified, specific preventive measures were taken. The abstract and concrete risk analysis for the Audi brand group is conducted annually.

### **Training of employees**

As part of the CMS, compliance and integrity training are an effective preventive measure to sensitize employees to existing and potential risks and to counteract violations. All training measures are reviewed on a regular basis within the framework of standardized processes, updated if necessary and continuously improved.

Back in 2024, a new WBT "Human Rights – Our Responsibility in the Volkswagen Group" developed in the Volkswagen Group was rolled out to all Ducati Group companies. In the nationwide mandatory qualification, which is aimed at all employees, managers, members of the Board of Management and internal stakeholders are informed about their responsibility to respect human rights, sensitized to possible human rights and environment-related risks and violations, and enabled to recognize and report them. In addition, the Volkswagen Group also qualifies relevant business partners in procurement and sales in key aspects of compliance and corruption prevention. For more information, see "Training for Employees and Business Partners" on page 8. In fiscal year 2025, dedicated qualification measures on the subject of Business and Human Rights (BHR) again took place. BHR aspects are also communicated during the onboarding of newly appointed compliance officers.

### **3. Measures in the supply chain**

The Audi Group, to which Ducati belongs, together with more than 12,300 direct Suppliers worldwide, has a major impact on the environment and society. In doing so, it is taken responsibility along the value chains for fair and human working conditions and integrate our internal partners into the activities in order to live up to this responsibility together. The development and implementation of responsible supply chain management is a central component of the procurement processes. Our commitment in this area is aligned with three strategic focus areas: the environment, people and innovation.

#### **Human right due diligence**

In the year under review, we continued to focus on people and further improve the Volkswagen Group's Responsible Supply Chain Management System. In line with this, the Human Rights Due Diligence Management System has been further developed within the Volkswagen Group, with a continued focus on further systematizing key aspects related to people. Based on a systematic risk analysis, the approach aims to avoid or minimize human rights and environmental risks along the Volkswagen Group's supply chain.

The risk analysis is used to identify risks in the Volkswagen Group's supply chain. The analysis is based on the Supplier's business models and takes into account external and internal data on human rights and environmental risks. Based on the assessment of the risks, suppliers are assigned a low, medium or high

sustainability risk. For suppliers with a low sustainability risk, a country risk score is also used. If there is an increased country risk for the supplier, it is upgraded to the medium risk range.

Based on the risk analysis, measures are assigned. In addition to the Ducati Code of Conduct for Business Partners or the Supply Chain Grievance Mechanism, these measures also include media screening, the Sustainability Rating (S- Rating) and in-depth human rights training, depending on the risk profile.

### **Sustainability requirements for our suppliers – the Code of Conduct for Business Partners**

The core element of the management of our Suppliers is the "Ducati Group's requirements for Sustainability in Relations with Business Partners" – the Code of Conduct for Business Partners. It is implemented in the Ducati Group and is confirmed as an integral part of the contract, applying in principle to all partner companies of the Ducati Group. It sets out our expectations of the behaviour of Business Partners with regard to environmental protection, human and labour rights, business ethics and sustainability requirements to ensure responsible supply chains. The requirements are based, among other things, on the OECD-Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and the relevant conventions of the International Labour Organization (ILO). However, the Code of Conduct for Business Partners is based not only on international standards, but also on the goals, rules and guidelines of the Volkswagen Group.

Specifically on the topic of modern slavery, the requirement for supplier companies is as follows: "

No modern slavery, no human trafficking, no unethical recruitment | Business partners must take appropriate and adequate measures to eliminate debt bondage, forced and compulsory labour, as well as all forms of modern slavery and human trafficking in their own area of responsibility and/or along the supply chain. Business partners ensure that employment relationships are voluntary and allow employees to give notice of their own volition in observance of a reasonable notice period. Employees of business partners are given a contract at the time of hiring that complies with applicable law and is in a sufficiently documented form (e.g. written or electronic), is written in a language they understand and in which their rights and obligations are truthfully and clearly set out. Furthermore, business partners must not mislead or defraud potential employees about the nature of the work, ask employees to pay recruitment fees or inappropriate transportation fees, and/or confiscate, destroy, conceal, and/or deny access to employee passports and other identity documents issued by government and/or restrict the employees' freedom of movement or require employees to involuntarily use accommodation provided by the company for no operational reason".

As part of the VW Group, our goal is to pursue the path to greater sustainability and responsibility on the basis of the defined requirements together with our suppliers in a risk-based partnership relationship.

In order to raise awareness of internal Suppliers we use numerous channels.

In addition to the information on the [ONE Group Business Platform](#), the information on [Audi website](#), the [information hub on the S-Rating and training courses with Suppliers](#).

### **Sustainability requirements as a criterion for awarding contracts**

The Group's goal is to identify the material sustainability risks in our supply chains and to address them effectively. In the Volkswagen Group, the sustainability rating (S-rating) is a binding award criterion for suppliers that supply production materials and risk-based for relevant suppliers in general procurement. In the award process, the S-Rating has equal value to the criteria of cost, quality, technological competence and logistics. It is based on a self-disclosure and is supplemented by an on-site inspection (audit) at the supplier on a risk basis. Following revision of the S-Rating in the 2025 reporting year, there are three possible rating results:

- A supplier with a positive result fulfills the requirements of the Volkswagen Group and is therefore eligible for being awarded contracts.

- If a supplier company does not fulfill the requirements, it receives a negative S-Rating and is fundamentally not eligible to be awarded a contract.
- If information required to assess the S-Rating is not available, the supplier is not eligible to be awarded a contract.

The basic requirement for an S-Rating as demonstration of eligibility for awarding new contracts provides a direct incentive for suppliers to comply with the Code of Conduct for Business Partners.

The survey and analysis of the site's sustainability performance is carried out using a standardized questionnaire, the so-called "Self-Assessment Questionnaire" (SAQ) of the Drive Sustainability Initiative. It provides with information on possible risks in the areas of corporate ethics, social affairs and the environment of the respective supplier companies. The information and documents in the SAQ are checked and validated by a service company: if a supplier company states that it has processes and policies in place, this must be proven by means of documents. Specifically, it also asks for a policy on human rights, which includes the topics of "forced or compulsory labour and human trafficking". A documented grievance mechanism is also requested. The aim is to identify deficits and initiate improvements through concrete indications. It is the task of the suppliers to actively remedy possible deviations from the required requirements afterwards.

Since the introduction of the S-rating until the end of the reporting period, more than 20,900 direct suppliers of the Volkswagen Group have concluded an SAQ. According to the feedback, 7,050 suppliers were able to improve their sustainability performance through targeted measures.

If, for example, the audit of the SAQ in combination with a country risk score reveals an increased risk, an on-site audit can be carried out at the supplier's premises, among other things, with regard to modern slavery, but also with regard to other aspects such as resource-saving production and occupational safety.

In 2025, 144 audits were carried out for the Volkswagen Group as part of the S-rating process. Deviations are recorded in a catalogue of measures, the so-called Corrective Action Plan, and must be remedied. It is then followed up whether the deficiencies identified by the sustainability auditor have actually been fixed. Monitoring is subsequently conducted to ascertain whether the deficiencies identified by the sustainability assessor are actually being rectified. In addition, the S-Rating was linked more closely to the Supply Chain Grievance Mechanism and the Raw Materials Due Diligence Management System in the reporting year.

### **Supply Chain Grievance Mechanism**

Another important component of sustainable supply chain management is the Group's Supply Chain Grievance Mechanism (grievance mechanism) for the supply chain, which it is used to investigate indications of possible violations of our sustainability requirements from the Code of Conduct for Business Partners.

The channel is accessible on Ducati Motor Holding's website via the Whistleblowing System and is available to all potentially affected parties and stakeholders, such as employees of direct and indirect suppliers and member of civil society. The review and processing of the information is uniformly described in a binding guideline, for Ducati is managed by the Audi Group and carried out jointly with the brands and regions of the Volkswagen Group.

In the event of serious violations, suppliers are temporarily barred from being awarded new contracts, and the business relationship may be terminated.

The process of the Supply Chain Grievance Mechanism is also linked and regulated with the process of the Whistleblower System. During the reporting period, the Supply Chain Grievance Mechanism processed 180 reports of violations in the Volkswagen Group.

### **Media monitoring**



Monitoring supply chains is an extremely complex task. This makes it all the more important to understand possible risks and establish connections at an early stage. For this reason, the VW Group operates a holistic risk monitoring system that combines different methods and systems.

In addition to more traditional and reactive channels such as the grievance mechanism, Audi also uses digital tools for automated, proactive monitoring. In the course of media monitoring, we collect publicly accessible news from sources such as social media channels and local news media worldwide. The information is then automatically analyzed and consolidated. If the tool identifies indications of possible breaches of our Code of Conduct for Business Partners, these are reviewed and, if necessary, processed in the Supply Chain Grievance Mechanism.

### **Training for employees and Business Partners**

The systematic training of our employees and suppliers is a central component of the strategy of the VW Group. In order to improve social and environmental standards in the supply chain, the VW Group use the S-Rating. In particular, for which employees and Business partners are trained accordingly in events and workshops. In order to enable the continuous development of our supplier companies, we offer topic-specific sustainability training and workshops for our supplier companies together with the Volkswagen Group. Since 2020, we have also been applying in-depth human rights training for supplier companies with an increased sustainability risk, including aspects of child labour, forced labour, and discrimination. In the reporting period, more than 6,400 direct suppliers received training on sustainability within the Volkswagen Group.

### **Systematic approach to upstream supply chain due diligence**

In addition to standard measures for a responsible supply chain, there are in-depth measures for both direct suppliers and indirect suppliers (so-called n-tier) in globally branched supply chains. In-depth measures include, in particular, the Human Rights Focus System (HRFS) and the Raw Materials Due Diligence Management System (RMDDMS).

#### **Human Rights Focus System**

The Human Rights Focus System (HRFS) is a specific management approach to identify systematic anomalies in the supply chain – by using internal data from the SCGM or from on-site audits, as well as by evaluating external information from Studies and NGOs. This helps to identify and address human rights and environmental risks that require a more in-depth analysis. In the 2025 reporting year, Ducati worked together with AUDI on the focus topic of “living wages.” In this context, the Group continued to work on the focus topic of living wages, with the Code of Conduct for Business Partners requiring suppliers to pay adequate wages that at least meet statutory minimum requirements and, where possible, cover basic needs and support a steady improvement in living conditions.

In the year under review, the data basis for calculating living wages was further enhanced and used to support the plausibility assessment of supplier wage costs. Measures taken in the year under review to promote fair working conditions included providing training for suppliers in order to provide a practical insight into the methodology and importance of a living wage.

#### **Raw Materials Due Diligence Management System**

The Raw Material Due Diligence Management System (RMDDMS) is used to address human rights and environmental risks in raw material supply chains. Certain raw materials are extracted and processed under conditions that pose a particularly high risk of violating our sustainability standards, whether through



discrimination or inadequate occupational safety precautions. The Volkswagen Group has identified 18 raw materials as being particularly risk-prone, including cobalt, copper and aluminum, and these are dealt with specifically in the RMDDMS. The due diligence process is based on the five steps of the “OECD Due Diligence Guidance for Responsible Business Conduct” and the requirements of the “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas” and risk-based audits are carried out at n-tier level.

Within the Volkswagen Group, AUDI AG bears responsibility for the raw materials aluminum and copper – and thus for analyzing the risks associated with these raw materials throughout the Group and for devising measures to minimize those risks. One example of implementation is the Aluminium Stewardship Initiative (ASI), which was formed from an alliance of various stakeholders in the aluminum industry. Its goal is to promote responsible extraction, processing and use of aluminum. Audi was the first car manufacturer worldwide to be certified for defined sites according to the “ASI Performance Standard” as well as the “ASI Chain of Custody Standard.”

#### 4. Progress report

In 2025, the focus was again on the implementation and further development of risk analyses on human rights and environmental risks as well as the corresponding preventive measures for the Audi brand group companies, including DMH, and suppliers. The independent Human Rights Officer for the Audi brand group and his continuous monitoring actions to review the LkSG risk management also make a further contribution to meeting the requirements of the LkSG. Further information on implementation can be found in the report on the fulfilment of the LkSG due diligence obligations.

As part of the Responsible Supply Chain Management System, the initiative to implement human rights due diligence has undergone further development since it started in 2021. In addition to the existing S-Rating, raw material-specific requirements regarding environmental and human rights risks were defined through specifications as criteria relevant to the awarding of contracts. As part of the Human Rights Focus System, the Volkswagen Group conducted risk-based, deep dive social standard audits at direct suppliers in 2025. The aim was to provide detailed transparency on the human rights situation at the supplier level and to specifically address any deviations identified. Suppliers found to be in violation are obliged to develop concrete action plans and demonstrate their implementation to independent auditors.

Ducati Motor Holding S.p.A.  
30 June 2026

-----  
Raffaella Ponticelli  
HR & Organization Director  
Ducati Motor Holding S.p.A.

-----  
Federico Sabbioni  
Supply Chain Director  
Ducati Motor Holding S.p.A.

-----  
Paola Mocavero  
Chief Compliance Officer  
Ducati Motor Holding S.p.A.