

Alphabet (GB) Limited

Alphabet (GB) Limited Slavery and Human Trafficking Statement for 2024

This statement is made by Alphabet (GB) Limited ('ALPHABET') pursuant to section 54 of the UK Modern Slavery Act 2015 ('the Act') to identify actions taken by ALPHABET and the BMW Group during the financial year ending 31 December 2024 to prevent slavery and human trafficking from occurring in its supply chains and business. The statement considers:

1. BMW Group business and supply chains
2. BMW Group's approach to human rights (including slavery and human trafficking)
3. The approach of the BMW Group to eliminating slavery and human trafficking from its business and supply chain

Although not all BMW Group companies are subject to the Act, the BMW Group takes a group-wide approach to its human rights commitments.

THE BMW GROUP'S BUSINESS

The BMW Group is one of the most successful manufacturers of cars in the world and its BMW, MINI and Rolls-Royce premium and luxury brands are three of the strongest in the automotive industry today. The BMW Group also has a strong market position in the motorcycle industry and is a successful financial services provider. The success of the BMW Group has always been based on long-term thinking and responsible action. We have established ecological and social sustainability throughout the value chain, comprehensive product responsibility and a clear commitment to conserving resources as an integral part of its strategy.

The BMW Group's production network comprises 33 locations in 16 countries. Operating on a global scale, the BMW Group employed a workforce of 159,104 people at the end of the year under report.

The global sales network of the BMW Group's automobile business currently comprises more than 3,500 BMW, over 1,600 MINI and 149 Rolls-Royce dealerships. Currently, BMW motorcycles are sold by more than 1,300 dealerships and importers in around 100 countries.

The ultimate parent company of the BMW Group is Bayerische Motoren Werke Aktiengesellschaft (BMW AG), which was founded in 1916 and is headquartered in Munich, Germany.

ALPHABET is part of the BMW Group and is a leading provider of Mobility services.

SUPPLY CHAIN.

The automotive supply chain is one of the most complicated of any industry with often six to ten tiers of suppliers between a manufacturer and the source of raw materials that enter the manufacturing process. Our network of supplier locations for direct and indirect goods and services is responsible for the largest share of our value creation and it is vitally important that they safeguard social and legal standards.

The BMW Group is a leading provider of financial services in the automotive sector. It offers these services in over 50 countries worldwide via companies and cooperation arrangements with local financial services providers and importers. The Financial Services segment's main business is credit financing and the leasing of BMW Group brand automobiles and motorcycles to retail customers. Customers can also choose from an attractive array of insurance products.

Operating under the brand name Alphabet, the BMW Group's international multi-brand fleet business provides financing and comprehensive management services for corporate car fleets in more than 20 countries. These services also include helping customers to manage their fleets on a sustainable and climate-friendly basis.

THE BMW GROUP'S COMMITMENT TO HUMAN RIGHTS (INCLUDING SLAVERY AND HUMAN TRAFFICKING).

The BMW Group takes its social responsibility seriously. Our corporate culture is based on the values of openness, appreciation, trust, transparency, and responsibility; our corporate governance is aligned with ethical principles. Various internationally recognised guidelines serve as guidance for dealing with employees in a socially sustainable manner and for generally ensuring social standards.

In December 2022, we published our "policy statement on respect for human rights and corresponding environmental standards". In this statement, we express our commitment on respect for human rights, explain the procedures for abiding by human rights and environmental due diligence obligations in the supply chain, the specific risks identified, and the company's human rights and environmental expectations of its employees and suppliers. The policy statement as well as further information can be found [here](#).

The BMW Group is supportive of initiatives to standardise sustainability requirements and introduce monitoring mechanisms, for example in mining and the processing of critical raw materials. We see a high risk for modern slavery in these areas. The BMW Group is therefore an active member in the major networks on human rights, including:

- UN Global Compact – the world’s largest initiative for responsible corporate leadership.
- Econsense – Forum for Sustainable Development of German Business.
- Drive Sustainability – The European Business Network for Corporate Social Responsibility.
- Responsible Business Alliance – Industry coalition dedicated to corporate social responsibility in global supply chains.
- Industry Dialog Automotive for Business and Human Rights of the German government.
- German Institute for Compliance – Leader of the working group Human Rights.

In addition, the BMW Group participates in various cross-sectoral initiatives for example:

- Aluminium Stewardship Initiative - for environmental, social, and human rights standards in aluminium production (ASI); and
- Responsible Minerals Initiative – a framework to enable member companies to identify and address potential adverse impacts arising from their business activities related to extraction, transportation, and manufacturing of minerals.

For more information on our activities in raw materials and standardisation initiatives, see our current [BMW Group Report 2024](#) and our website [here](#).

THE BMW GROUP’S DUE DILIGENCE PROCESS FOR HUMAN RIGHTS (INCLUDING SLAVERY AND HUMAN TRAFFICKING).

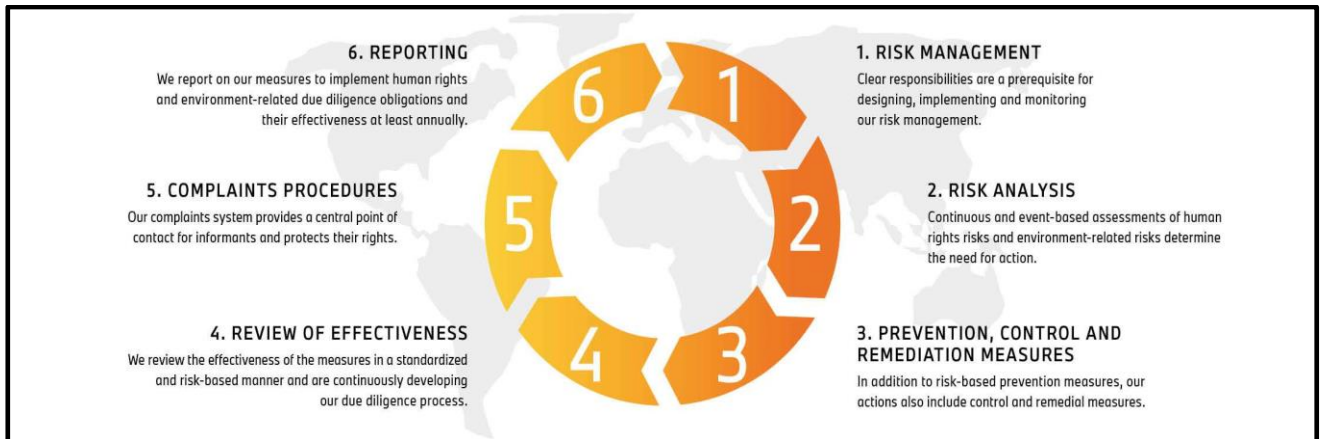
THE BMW GROUP’S BUSINESS.

Our human rights due diligence approach aligns with the requirements of the UN Guiding Principles on Business and Human Rights (UNGPR) and was updated in 2023 to reflect the requirements stemming from the German Supply Chain Due Diligence Act. A detailed description of our human rights' due diligence program, the main identified risks and further activities like our complaints mechanisms is available online [here](#).

HOW WE ENSURE RESPECT FOR HUMAN RIGHTS.

We have established appropriate due diligence processes to ensure compliance with social and environmental standards – both within our own company and in our relationships with suppliers and other business partners. We are guided by internationally recognised standards, including the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights and the Ten Principles of the UN Global Compact. The associated demands on our company, our supply chain and our other business partners are anchored at the BMW Group through internal

guidelines.



- BMW Group Policy Statement on Respect for Human Rights and Corresponding Environmental Standards [here](#)
- BMW Group Code on Human Rights and Working Conditions [here](#)
- Joint Declaration on Human Rights and Working Conditions [here](#)
- BMW Group Code of Conduct [here](#)
- BMW Group Supplier Code of Conduct [here](#)

LEVERAGING OUR IMPACT TOGETHER.

To fulfil our responsibility, the BMW Group relies on cooperation with our employees, our business partners, and our suppliers – because the only way to address the risks in our supply chain effectively is by working together. That is why our approach to compliance with human rights and environment-related standards applies to:

- *our own business area,*
- *our suppliers,*
- *and our other business partners.*

RESPONSIBILITIES.

We have been committed to the respect of human rights and environment-related standards throughout our global supply chain for many years. Across the company, we have defined clear responsibilities for effective implementation and monitoring due diligence requirements.

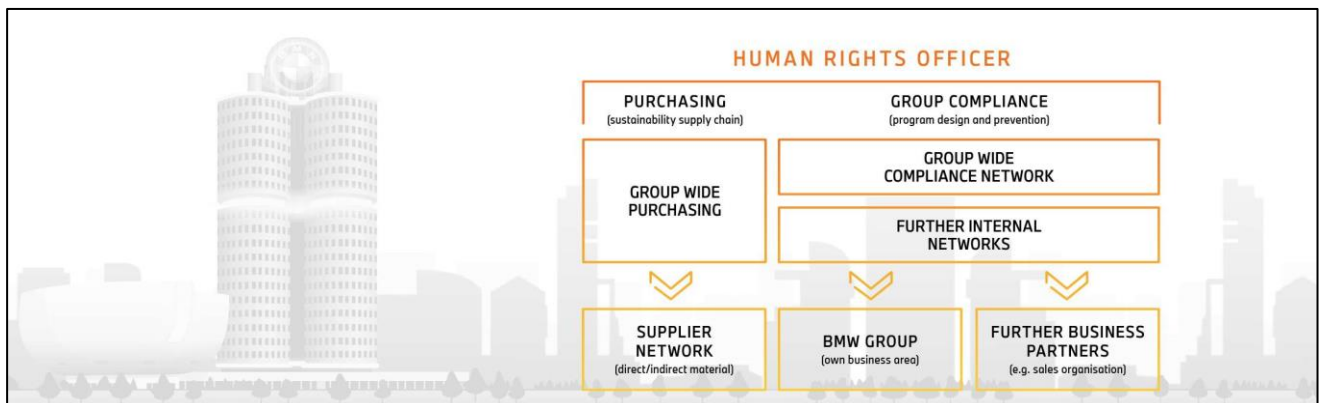
In 2021, the Board of Management appointed the Chief Compliance Officer as Human Rights Officer, assigning to him the monitoring role for risk management provided for the Supply Chain Due Diligence Act to ensure implementation of due diligence obligations within the BMW Group. The Human Rights Officer works in close consultation with the responsible business units and reports to the Board of Management at regular intervals and under specific circumstances.

Within the BMW Group, responsibility for compliance with human rights and corresponding environmental standards resides with the company's respective business departments and operating units or with the management of affiliated companies; outside the company, it lies with the business partners and suppliers concerned.

The compliance function is responsible for the overall design to respecting human rights and associated environmental standards as well as for the overall management of due diligence processes in our own business area and by other business partners.

Further specialist departments and internal networks, such as occupational health and safety, environmental protection, human resources or corporate safety, report regularly and on a case-by-case basis not only to the bodies functionally responsible for them, but also to the Human Rights Officer in accordance with defined requirements in the context of the Supply Chain Due Diligence Act.

The Purchasing and Supplier Network department is responsible for managing our due diligence processes in the supplier network.



RISK MANAGEMENT.

Being aware of our risks is fundamental to our risk-based approach. Our corporate due diligence activities are based on a comprehensive risk assessment that provides information on action areas and the degree of urgency. Annually, and on an ad-hoc basis – for example, in response to

substantiated knowledge – we examine and assess the risk to human beings and the environment, as well as the impact of our business activities.

We consider potentially impacted groups, such as our own employees (including temporary staff and apprentices), employees of business partners and joint venture partners, employees in our supply chain and groups of people indirectly linked to the supply chain, such as members of local communities.

As a manufacturing company with international locations and many suppliers and other business partners, our activities are associated with inherent risks for human beings and the environment. We are aware of this and respond with risk-based preventive and remedial measures. Particular attention is paid to our global, interconnected and highly complex supply chains.

PREVENTIVE, CONTROL AND REMEDIAL MEASURES.

We implement risk-based, ad-hoc measures to prevent, monitor and address human rights and environmental risks. We rely on a catalogue of measures that combines training, contractual agreements with suppliers and business partners, certification and reviews using questionnaires or assessments.



VERIFYING EFFECTIVENESS.

Our due diligence processes are designed to identify human rights and environmental risks, as well as adverse impacts, with a focus on effectively preventing, halting or minimizing such risks. Assessing the effectiveness of our due diligence processes and measures at regular intervals is crucial to maximizing our efficiency – because a measure can only be deemed effective if it improves, or helps improve, environmental protection or the situation of rights-holders.

Our effectiveness analysis not only evaluates whether implemented risk management processes

remain compliant with the German Supply Chain Due Diligence Act, but also whether they are seamlessly integrated and successfully executed. It provides information on whether the measures are achieving the intended risk reduction or remedial effect. We can continuously refine our processes based on this information.

COMPLAINTS MECHANISMS.

Various complaints procedures are in place for in-house and external whistleblowers to flag up potential human rights violations and associated breaches of environmental standards. This allows us to identify and address risks early on and provide suitable remediation support, if needed. Confidentiality and the protection of whistleblowers is our top priority, and grievances can be reported anonymously. In keeping with our Group-wide policy, we do not take any steps to identify anonymous informers.

As well as our established grievance channels of BMW Group compliance – including the SpeakUP Line and our ombudsperson can also be contacted by e-mail bmw-ombudsperson@hvc-strafrecht.de – we operate supply chain-specific complaint channels for whistleblowers to use. Our Human Rights Contact Supply Chain handles reports of possible infringements of BMW Group sustainability policies in the supplier network and can be reached by e-mail humanrights.sscm@bmwgroup.com.

INTEGRATING AND ADVANCING SUSTAINABILITY IN THE SUPPLY CHAINS

The BMW Group considers responsible supply chain management as an integral part of good corporate governance. Our rigorous partner selection process is based on the criteria of quality, innovation, flexibility, cost, and sustainability. The BMW Group enshrines its obligatory sustainability standards in all its supply contracts. A multi-stage due diligence process has been established across all relevant areas of the organisation to delineate our responsibility for the supplier network. We rely on systematic risk analyses as well as prevention, empowerment, and remediation measures. We use standardised online assessments and on-site audits that are integrated in our business processes. As a pioneer in the automotive sector, we have made sustainability an integral part of our procurement process since 2014. The elimination of identified risks up to the start of production is a prerequisite for commissioning the supplier.

INCREASING TRANSPARENCY AND MINIMISING RISKS

The increase in transparency and resource efficiency in our supply chains is based on compliance with environmental and social standards as defined in the BMW Group Supplier Code of Conduct. The code summarises the BMW Group's requirements and expectations for the global supplier network, in accordance with internationally recognised sustainability standards and guidelines. We expect our business partners to comply with all legal requirements, protect the environment and respect human rights. The Supplier Code of Conduct is enshrined by contract as an integral part of the company's purchasing terms and conditions. We also expect our suppliers to pass on

the requirements to the respective sub-suppliers, where relevant.

The BMW Group Supplier Code of Conduct is based on legal regulations and internationally recognized standards such as the principles of the UN Global Compact and the ILO core labour standards and contains specifications for resource efficiency. Our employees in Strategic Purchasing are responsible for sustainability topics concerning the supply chain. We use due diligence processes to monitor the implementation of sustainability standards at our suppliers.

RELEVANT SUPPLIER LOCATIONS EVALUATED WORLDWIDE

The BMW Group has defined minimum requirements for supplier locations throughout its global value chain. For example, these minimum requirements include the implementation of preventive measures to minimise the potential negative impact for the parties involved, such as the supplier's employees. Compliance with these requirements is verified using the Drive Sustainability questionnaire.

The due diligence activities are integrated into the business process. The aim is to implement prevention measures to minimise human rights violations by the time all our immediate suppliers start production.

Preventive measures we require, depending on company size include:

- *An appointed member of management with responsibility for social sustainability,*
- *The publication of a CSR / sustainability report,*
- *Code of Conduct,*
- *A policy on working conditions and human rights,*
- *An occupational health and safety policy,*
- *A certified occupational health and safety management system according to ISO 45001 or comparable,*
- *Supplier Sustainability Policy communicated to subcontractors which includes prohibition of:*
 - *Child labour and young workers,*
 - *Modern slavery (i.e., slavery, servitude and forced or compulsory labour and human trafficking)*
 - *Harassment and non-discrimination*

In the period under review, we assessed 12,078 (2023: 7,650 / 2022: 7,183 / 2021: 5,101 / 2020: 3,220) nominated and potential supplier locations based on the industry-wide Drive Sustainability questionnaire worldwide. Our focus is on suppliers with a large tendering volume.*

Sustainability assessment of relevant supplier locations:

- *Proportion of suppliers of production-related material with implemented preventive measures at the time of awarding: 79% (2023: 55%).*
- *Proportion of suppliers of production-related material with agreed preventive measures at the time of awarding: 17% (2023: 31%).*

In addition, 132 onsite audits and assessments were carried out by or on behalf of the BMW Group in 2024 (2023: 95 / 2022: 49). Crucial areas of action identified by the audits and assessments have been highlighted and addressed together with the supplier. We have set ourselves the target of ensuring that all direct supplier sites that have been audited meet the locally applicable legal requirements for sustainability as well as international human rights standards (BMW Group minimum requirements).

In 2024, 22 of the 28 follow-up/closure assessments confirmed that all cases of non-compliance with minimum requirements (priority non-conformities) that were identified in initial assessments had been redressed. In two cases, the closure assessment carried out was not immediately able to confirm that the agreed measures had been implemented. However, together with the suppliers the BMW Group has now implemented these measures, which will be re-viewed by means of a new assessment in 2025.

In 2024, no existing supplier relationship was terminated due to severe ESG violations.

There were 22 indications of potential violations of our sustainability principles in the supply chain reported using the relevant channels during the reporting year 2024. 16 indications were investigated and closed in the reporting year. The remaining indications of potential incidents were still under internal investigation at the end of the reporting year.

UK MODERN SLAVERY ACT 2015.

In 2016, we introduced an additional process to evaluate all high-risk suppliers for our UK-based business service activities (e.g., distribution of parts, agencies supplying non-permanent workers, suppliers of lifestyle products, and ancillary services such as maintenance, security services, cleaning services, catering services, landscaping). Based on our annual evaluation in 2024, 105 UK service suppliers were identified as high risk (2023: 106; 2022: 97; 2021: 68; 2020: 59 (high-risk suppliers were identified)).

Their sustainability performance and specifically their observance of human rights, prohibition of forced labour, human trafficking and child labour were specifically monitored and evaluated.

To minimize the risk of modern slavery, we evaluate our suppliers based on specific requirements and preventive measures. It is crucial for suppliers to designate a management representative responsible for social sustainability, who will prioritize this issue. Additionally, having a supplier code of conduct and a policy on working conditions that addresses human rights—particularly the prohibition of forced labour—is essential. Furthermore, we emphasize the importance of suppliers establishing sustainability requirements and communication channels that extend the prohibition of modern slavery to their own supply chains.

Among the 105 suppliers:

- *44 suppliers already fulfil our minimum requirements on environmental, social, and compliance/ governance related aspects, including the implementation of measures to prevent slavery and human trafficking from occurring in its supply chains and business,*
- *8 suppliers have agreed a deadline for implementing preventive measures and are in the implementation phase of preventive measures,*
- *25 suppliers have yet to agree with the BMW Group on a deadline for implementing preventive measures on environmental, social, and compliance/ governance related aspects. However, among these suppliers:*
 - *23 suppliers fulfil the requirement of appointing a management person responsible for social sustainability,*
 - *25 suppliers have a code of conduct,*
 - *20 suppliers have a policy on working conditions and human rights,*
 - *23 suppliers have defined sustainability requirements for their suppliers that include the prohibition of modern slavery.*
 - *22 suppliers have established communication channels for CSR/sustainability requirements*
- *The 28 remaining suppliers have already been contacted to identify possible risks as part of our process.*

THE BMW GROUP'S TRAINING ON HUMAN RIGHTS.

The BMW Group offers a wide range of sustainability training courses for purchasers, internal process partners and suppliers to make them more aware of the topic. This includes classroom courses in association with the University of Ulm to become a “Certified Sustainability Officer” as well as a web-based training course in association with Econsense, which includes case studies on sustainability in the supplier network. In addition, we participate in the industry-wide supplier training in high-risk countries, which is coordinated by CSR Europe (European Business Network for Corporate Social Responsibility).

After the adoption of the UN Guiding Principles on Business and Human Rights, the BMW Group implemented a comprehensive employee training programme. We train our employees through face-face training; web-based training; internal communications and newsletters. Human rights are also integrated into induction events for new employees and presentations are available on the BMW Group Intranet pages.

The Senior Management of the UK-based entities are aware of each entities' responsibilities under the Act. An additional web- based training programme was rolled out in 2017 to heighten awareness of the Act. In 2024, this web-based training continued to form part of all BMW (UK) Manufacturing Limited associates' annual mandatory training programme.

M Dennett

M Dennett (Jun 3, 2025 13:54 GMT+1)

Mike Dennett,

Chief Executive Officer

Alphabet (GB) Limited

Date: 03/06/2025

Ursula Wingfield

Ursula Wingfield (Jun 3, 2025 13:26 GMT+1)

Ursula Wingfield,

Chief Finance Officer

Alphabet (GB) Limited

Date: 03/06/2025

COMPANY REFERENCES

- Our website “Respect for people and the environment” contains all relevant information for this topic [here](#).
- More information about the BMW Group Complaints mechanism is published [here](#).
- Our policy, the “Joint Declaration on Human Rights and Working Conditions in the BMW Group”, has been adopted by the BMW AG’s CEO with Works Council assent in 2005, reconfirmed in 2010. The document is published the BMW Group website [here](#).
- The BMW Group Report 2024 is published on the BMW Group website [here](#).
- The “BMW Group Code on Human Rights and Working Conditions” is published on the BMW Group website [here](#).
- Regarding our suppliers, the publicly available “BMW Group Supplier Code of Conduct” outlines basic principles we require our suppliers to adhere to including respect for human rights, as published on the BMW Group website [here](#).
- The BMW Group Supplier Code of Conduct is incorporated in our International Purchasing Terms and Conditions [here](#) and our General Terms and Conditions [here](#).
- Further information regarding our sustainability requirements for BMW Group suppliers can be found in our documentation: Sustainability Questionnaire for Suppliers [here](#).

ALPHABET