



# SEAT Group Slavery and Human Trafficking Statement

*/ This statement is made in accordance with Section 54 of the United Kingdom's Modern Slavery Act of 2015.*

## / Organisation

SEAT is the only company that designs, develops, manufactures and markets cars in Spain. A member of the Volkswagen Group, the multinational has its headquarters in Martorell (Barcelona), exporting 81% of its vehicles, and is present in over 80 countries through a network of 1,700 dealerships.

SEAT Group employs more than 14,500 professionals at its three production centres – Barcelona, El Prat de Llobregat and Martorell. Additionally, the company produces some of its vehicles in other factories of the Volkswagen Group, that is, in Czech Republic, Portugal and Slovakia.

For the manufacture of its products, the Group and its brands procure goods and services from suppliers located all over the world.

## / Measures within the Company

### *SEAT Group Code of Conduct<sup>1</sup>*

The SEAT Group Code of Conduct provides our employees with a practical guide, summarising the key basic principles for an upright conduct and providing support should they ever face legal or ethical challenges. The observance of internationally recognized human rights forms part of this Code of Conduct. We act in accordance with the values set out in the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the declarations of the International Labour Organization (ILO).

### *The Whistle-blower Channels of the SEAT Group<sup>2</sup>*

In order to be able to report on legal and regulatory violations in connection with the SEAT Group, our employees, business partners and other third parties have at their disposal a whistleblowing channel ([transparencia@seat.es](mailto:transparencia@seat.es)) as well as the external *Ombudsmen*. The suspicion of human rights violations can also be reported through said channels. The allegations are dealt with in accordance with internal procedures in order to ensure the best possible protection of the information provided, the informant and the person concerned.

### *Compliance Culture and Qualification of employees*

At the SEAT Group we promote the compliance with regulations in our organisation and raise the awareness of our employees by means of preventive actions, specifically communication campaigns as well as training and information programmes. All employees joining SEAT undertake the contractual obligation to comply with the Group's Code of Conduct, and also attend a training and awareness session as to the need to respect all values and principles contemplated therein, including the observance of internationally recognized human rights. In addition, employees have access to consultation channels and teaching materials in order to obtain further information about the Code of Conduct.

<sup>1</sup> <http://www.seat.com/content/dam/public/our-company/code-conduct-seat-group/pdf/code-of-conduct.pdf>

<sup>2</sup> <http://www.seat.com/corporate/compliance/whistleblowing-channels.html>



## / Measures in the Supply Chain

### Sustainability requirements for our Suppliers

We promote the sustainability among our suppliers based on the Volkswagen Group requirements regarding Sustainability in supplier relations included in "Code of Conduct for Business Partners"<sup>3</sup>. The requirements incorporate internationally acknowledged human rights, namely the principles of the United Nations Global Compact, the International Chamber of Commerce's Business Charter for Sustainable Development and the relevant conventions of the International Labour Organisation. The requirements also formulate the SEAT Group's expectations for our Suppliers according to the "Automotive Industry Guiding Principles to Enhance Sustainability Performance in the Supply Chain"<sup>4</sup> with respect to Environmental Standards, Business Ethics, Working Conditions and Human Rights.

Our goal is to ensure the compliance with these sustainability standards along the entire global Supply Chain by integrating them into the procurement process on a contractual level. Therefore, our Suppliers must acknowledge the sustainability requirements before submitting a quotation and are committed to update this acknowledgement every 12 months.

Additionally, before the negotiations with potential contractors begin, the SEAT Group applies a country-specific risk analysis. It combines data from third parties with internal experience to assess specific risks of non-compliance with human, social and environmental rights at the respective contractor locations. We also check the integrity of our business partners (Business Partner Check) in a risk-oriented manner, before entering into a business relationship.

### Training and monitoring of Suppliers

To facilitate the on-going suppliers' development, in the course of our business relations, the latter must fulfil an electronic learning (e-learning) module on sustainability available to all suppliers in the B2B Platform. To assure the suppliers' compliance with our sustainability requirements, we use distinct tools. They include our self-assessment questionnaire, the inclusion of sustainability as part of our Supplier quality audits and the performance of corporate social responsibility audits to our suppliers, mainly focused on Environmental Standards, Business Ethics, Working Conditions and Human Rights.

### Sustainability Procurement Network

By sharing the supplier related knowledge from diverse areas of the company in regular meetings of an "Ad Hoc Expert Team" we are able to manage the compliance with our Sustainability requirements focused on the specific nature of each case. Additionally, to identify current developments as well as long-term structural challenges in each country, we rely on the on-going exchange of information between the brands and the regions at the regular meetings and videoconferences held by the sustainability procurement network.

<sup>3</sup> <http://www.volkswagenag.com/presence/nachhaltigkeit/documents/policy-intern/2016%20Code%20of%20Conduct%20for%20Business%20Partners%20DE-EN.pdf>

<sup>4</sup> <http://www.csreurope.org/sites/default/files/Guiding%20Principles.pdf>



### **/ Sustainability Strategy**

Finally, in order to promote economic, social and environmental sustainability across the organisation, the SEAT Group set up a Sustainability Team in 2014. This Team coordinates all activities carried out within the company to reinforce the SEAT commitment not only with financial and environmental sustainability but also with social responsibility, as well as risk and compliance corporate culture and ensures alignment with the Volkswagen Group Sustainability Strategy.

### **/ Outlook**

Our company will show the same intolerance towards human rights violations in the future as well. Because we regard such violations as a dynamic risk, we will align, together with the Volkswagen Group, our monitoring procedures with on-going developments and we will continue to raise awareness of forms of modern-day slavery and human-trafficking both inside and outside the company. One such measure will be to refine the Volkswagen Group Code of Conduct for Business Partners by adding modern-day slavery and human trafficking as examples of human rights' abuses.

**SEAT, S.A.**

*June 2017*

A handwritten signature in black ink, appearing to read 'Luca de Meo', with a long horizontal stroke extending to the right.

**Luca de Meo**

President of the Executive Committee

**SEAT, S.A.**

A handwritten signature in black ink, appearing to read 'Luis Comas', with a long horizontal stroke extending to the right.

**Luis Comas**

Executive Vice-President

Legal Affairs and Governance

**SEAT, S.A.**