

Company Name BMW
Industry Automotive (Own Operations and Supply Chain)
Overall Score 24.1 out of 100

Theme Score	Out of	For Theme
1.6	10	A. Governance and Policies
9.9	25	B. Embedding Respect and Human Rights Due Diligence
5.0	20	C. Remedies and Grievance Mechanisms
4.3	25	D. Performance: Company Human Rights Practices
3.4	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: The Company states in its Code on human rights and working conditions that it 'is committed to respecting internationally recognized human rights.' [Code on human rights and working conditions, 12/2020: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Commitment to the UNGPs: The Company indicates in its Code: 'The BMW Group's activities consider the following international standards: the ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights,...'. However, 'to consider' is not considered a formal commitment following CHRB wording criteria. [Code on human rights and working conditions, 12/2020: bmwgroup.com] Not Met: Commitment to the OECD Guidelines for Multinational Enterprises: As indicates above, the Company indicates in its Code: 'The BMW Group's activities consider the following international standards: the ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights,...'. However, 'to consider' is not considered a formal commitment following CHRB wording criteria. [Code on human rights and working conditions, 12/2020: bmwgroup.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Company has a commitment to the ILO Core: The Company's Joint Declaration on Human Rights includes provision for each of the ILO Core: 'Forced and compulsory labour (including bonded labour or non-voluntary prisoners

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	Declaration on Fundamental Principles and Rights at Work		<p>labour) as defined in ILO Conventions no. 29 and 105 is rejected. [...] No discrimination [...] No child labor [...] The right of all employees to form collective employee representations and run collective negotiations to settle working conditions is recognised'. [Joint Declaration on Human Rights and Working Conditions, 2010: bmwgroup.com]</p> <ul style="list-style-type: none"> • Met: Company has an explicit commitment to All four ILO Core: As indicated above, the Company's Joint Declaration on Human Rights includes provisions for each of the ILO Core: 'Forced and compulsory labour (including bonded labour or non-voluntary prisoners labour) as defined in ILO Conventions no. 29 and 105 is rejected. [...] No discrimination [...] No child labor [...] The right of all employees to form collective employee representations and run collective negotiations to settle working conditions is recognised'. [Joint Declaration on Human Rights and Working Conditions, 2010: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company expects suppliers to commit to ILO Core: The Company's Supplier Sustainability Policy indicates: 'all suppliers are called upon to observe the principles and rights set forth in the guidelines of the UN Initiative 'Global Compact' and the 'ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up'. In addition, it explicitly makes a reference to each one of the ILO Core (See below). [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] • Met: Company explicitly lists All four ILO for suppliers: The Supplier Sustainability Policy indicates: 'all suppliers are called upon to observe the principles and rights set forth in the [...] 'ILO Declaration on Fundamental Principles and Rights at Work' [...] Of particular importance are [...] the prohibition of child labor; the prohibition of modern slavery (i.e. slavery, servitude and forced or compulsory labor and human trafficking); the prohibition of harassment and discrimination; ensuring the right to freedom of association and collective bargaining and; compliance with all applicable labor regulations e.g. regarding working hours, wages and benefits and work safety'. [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to respect H&S of workers: The Code states: 'Around the world the BMW Group complies with all the applicable employment protection legislation and sets its own additional standards for improving occupational safety. Effective management systems and certification (e.g. OHSAS 18001) allow regular controls in order to verify adherence to specifications concerning occupational health and safety as well as ergonomic workplace design, which in turn reduces the risk of accidents'. [Code on human rights and working conditions, 12/2020: bmwgroup.com] • Not Met: Respect ILO labour standards on working hours or Commit to 48 hours regular work week: The Company indicates: 'The BMW Group complies with national legal working time regulations as a minimum requirement. In addition, our working time principles describe the BMW Group values for employees resting times, leisure, holiday and a healthy life balance. They support BMW Group entities worldwide in designing working time schedules. Working times and break times take into account not only business but also personal needs. They are based on scientific criteria, such as medically recognized limits regarding physical and psychological stress.' However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Code on human rights and working conditions, 12/2020: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The Company indicates in its Code: 'The General Terms and Conditions of Business and the International Purchasing Conditions of BMW Group stipulate that suppliers must commit to respecting human rights and in particular that they must abide by the ILO Declaration on Fundamental Principles and Rights at Work. [...] As well [...] suppliers must adhere to occupational health and safety standards and provide adequate working conditions'. [Code on human rights and working conditions, 12/2020: bmwgroup.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week
A.1.3.a.MO	Commitment to respect human rights particularly	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Responsible mineral sourcing: The Company states in its Supplier Sustainability Policy: 'We aim to use only raw materials in our products, whose extraction, production, transport, trade, processing and export neither directly nor

Indicator Code	Indicator name	Score (out of 2)	Explanation
	relevant to the industry – responsible sourcing of minerals (MO)		<p>indirectly contribute to human rights abuses, health & safety issues, environmental pollution or compliance breaches'. However, 'to aim to' is not considered a formal statement of commitment according to CHRB wording criteria. [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com]</p> <ul style="list-style-type: none"> • Met: Based on OECD Guidance: The Company indicates: 'With regard to raw materials, such as tin, tungsten, tantalum and gold (3TG) from conflict-affected and high-risk areas (CAHRAs) like the Democratic Republic of the Congo (DRC), as well as other raw materials, such as cobalt, lithium, copper etc., we established processes in accordance with the 'OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas' and expect our suppliers to do the same. Smelters and refiners without adequate, audited due diligence processes in place should be avoided'. [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] • Met: Requires suppliers to commit to responsible mineral sourcing: As indicated above, the Company states that it 'establishes processes in accordance with the 'OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas' and expects its suppliers to do the same. Smelters and refiners without adequate, audited due diligence processes in place should be avoided'. [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] Score 2 • Not Met: Commits to follow OECD Guidance for all minerals: As indicated above, the Company indicates in its Supplier Sustainability Policy: 'With regard to raw materials, such as tin, tungsten, tantalum and gold (3TG) from conflict-affected and high-risk areas (CAHRAs) like the Democratic Republic of the Congo (DRC), as well as other raw materials, such as cobalt, lithium, copper etc., we established processes in accordance with the 'OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas' and expect our suppliers to do the same.' However, it is not clear whether all minerals are covered by this provision. [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] • Not Met: Suppliers expected to make similar requirements of their suppliers
A.1.3.b.MO	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (MO)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights • Not Met: Children's rights • Not Met: Migrant worker's rights • Not Met: Expects suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles • Not Met: Child Rights Convention/Business Principles • Not Met: Convention on migrant workers • Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: The Company commits to remedy • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance attacks on HRs Defenders (HRDs) • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board level responsibility for HRs: The Company indicates in its Sustainable Value Report: 'The Board of Management governs the BMW Group under its own responsibility, acting in the interests of the company and with the aim of achieving sustainable growth in value. It determines the strategic orientation of the enterprise and ensures its implementation. The Board of Management is also responsible for ensuring compliance with all provisions of the law and internal regulations as well as for adequate risk management and controlling. The Supervisory Board advises and supervises the Board of Management in conducting its duties (dual management system)'. The statement of Corporate Governance includes a section on social responsibility towards employees and along the supply chain. It also indicates that the Audit Committee is tasked with preparing the Supervisory Board's audit of the non-financial reporting, preparing the selection of the auditor for nonfinancial reporting, and engaging the auditor. No evidence found, however, of a Supervisory board committee or member with explicit oversight responsibility for human rights topics. The Group Report indicates that the supervisory board and the Audit committee are informed with compliance reporting. However, despite being briefed about compliance. No evidence found of a Supervisory Board committee having specific governance oversight of human rights. [Sustainable Value Report 2019, 2020: bmwgroup.com] & [Annual Report 2019, 03/2020: annualreport.bmwgroup.com] • Not Met: Describe HR expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO
A.2.2	Board responsibility	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board/Committee review HRs strategy: The Company indicates in its Sustainable Value Report 2019: 'The Board of Management works to ensure that the Group's Strategy is aligned with sustainability in the long term. The special-purpose Sustainability Board was fully involved in regular Board of Management meetings in 2019, allowing sustainability issues to be even more consistently integrated into the company's decision-making processes. Since then, sustainability issues have been treated like every other topic and discussed as needed at fortnightly Board of Management meetings. All specific decisions referred to the Board of Management are subject to a mandatory sustainability evaluation. However, this evidence refers to executive level board. No evidence found of supervisory board level-committee process to discuss and regularly review Company human rights strategy, policy or management processes during latest review. See indicator A.2.1 for further description on board responsibility for human rights. [2021 BMW Group report, 2022: bmwgroup.com] & [2021 Statement on Corporate Governance, 10/03/2022: bmwgroup.com] • Not Met: Examples/trends re HR discussion in the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Incentives for at least one board member: Parameters of the variable remuneration component for Supervisory and Management Board members include 'primarily qualitative, non-financial criteria, expressed in terms of a performance factor aimed at measuring the Board member's contribution to sustainable and long-term performance and corporate orientation'. ESG criteria include innovation performance, development of the BMW Group's reputation based on ESG aspects, etc. However, no specific human rights-related topics included were found to be included in remuneration incentives. [2021 BMW Group report, 2022: bmwgroup.com] • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy • Not Met: Describe frequency and triggers for reviewing

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Senior responsibility for HR implementation and decision making: The Company states that it created 'a new Chief Compliance Officer role'. 'In addition to being responsible for the Compliance Management System (CMS), it briefs the Board of Management and Supervisory Board [...] on development and implementation of the CMS at regular intervals'. The CMS 'addresses all relevant compliance topics, including fraud prevention, export control, anti-money laundering, antitrust compliance, corruption prevention and human rights and data privacy and technical compliance'. These last two topics are the responsibility of the respective specialist departments'. It further clarifies that 'the Board of Management decided in December 2021 to appoint a Human Rights Officer and assigning this role to the head of Group Compliance'. Concentrating relevant expertise in this new function will also contribute to the strategic alignment of the Company in the social dimension of sustainability'. [2021 BMW Group report, 2022: bmwgroup.com] & [Annual Report 2019, 03/2020: annualreport.bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: As described above, the Company created a role of the Human Rights officer assigned to the head of compliance. See below description of how Compliance management system responsibility is allocated across the Company. In addition, the department Purchasing and Supplier network is responsible for supply chain management'. [2021 BMW Group report, 2022: bmwgroup.com] • Met: Day-to-day resources and expertise allocation in own ops: The Human Rights code indicates that 'managers are responsible for implementing the BMW Group Code on Human Rights and Working Conditions in their respective areas of responsibility. Every manager has the duty to inform his or her employees of the content and importance of this Code and to advise and support them in implementing its principles in their day-to-day business'. The Group report states that 'More than 230 managers group-wide perform these tasks [responsibility to ensure lawful conduct and responsibility for identifying and evaluating any compliance risks that arise in the course of their daily activities). 'Specialist departments are supported in their work by the central Group Compliance function, as well as a Group -wide network of business unit and division compliance functions, supplemented by around 80 local Compliance Officers (heads of local compliance functions) [...] Local Compliance Officers are tasked with implementing the CMS [which, as indicated above, include human rights], and compliance programs for relevant topics within their area of responsibility. [Code on human rights and working conditions, 12/2020: bmwgroup.com] & [2021 BMW Group report, 2022: bmwgroup.com] • Not Met: Resources and expertise allocation in the supply chain: The Company indicates that 'The department Purchasing and Supplier Network is responsible for the worldwide procurement and quality assurance of production materials, raw materials, capital goods and services as well as the production of vehicle components manufactured in-house'. No further details found on resources and expertise allocation in the supply chain. [2021 BMW Group report, 2022: bmwgroup.com]
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Senior manager incentives for human rights • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR risks is integrated as part of enterprise risk system: The Company describes risk and opportunity management including overall risk and opportunity

Indicator Code	Indicator name	Score (out of 2)	Explanation
	risk management		<p>situation, how risk management is organised and revised, risk measurement (in terms of financial implications) and type of existing risks. Risks and opportunities related to purchasing include potential failure of individual suppliers to deliver due to non-compliance with sustainability standards. Legal risks related to compliance also imply non-compliance with human rights provisions. [2021 BMW Group report, 2022: bmwgroup.com]</p> <ul style="list-style-type: none"> • Not Met: Provides an example: Although the Company devotes documents and sections to handling supplier network, no explanation found on how these management is included within the general enterprise risk management. [2021 BMW Group report, 2022: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Communicates its policy to all workers in own operations: The Company indicates in its Code on Human Rights: 'Every manager has the duty to inform his or her employees of the content and importance of this Code and to advise and support them in implementing its principles in their day-to-day business.' In addition, the Company states in its Group Report that 'during the year under review, we redesigned or Group-wide mandatory Compliance Essentials online training to create a user-oriented approach with focused content and a high level of interactivity. This training formed part of the mandatory training programme and included human rights topics in the year under report'. The GRI Index document also indicates that 'human rights are a component of the introductory seminars for new employees, and of our web-based training on sustainability. We regularly update the compliance-related training documents used in face-to-face training, most recently in 2019 Since 2021, the topic of human rights has also been part of the Group-wide online training programme "Compliance Basics". Since 2021 participation in this training programme has been mandatory once every two years for all employees worldwide who work in indirect areas'. Training is assumed to take place in local languages. [2021 BMW Group report, 2022: bmwgroup.com] & [2021 GRI Content Index, 2022: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Met: Requires suppliers to communicate policy requirements: In its Code on Human Rights, the Company states: 'The General Terms and Conditions of Business and the International Purchasing Conditions of BMW Group stipulate that suppliers must commit to respecting human rights and in particular that they must abide by the ILO Declaration on Fundamental Principles and Rights at Work. They are required to cause their sub-contractors to act accordingly by undertaking reasonable and meaningful steps to ensure that these responsibilities are realized, e.g. by communicating a supplier sustainability policy for their suppliers'. [Code on human rights and working conditions, 12/2020: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: See above. In addition, The terms and conditions for the purchasing of production materials and automotive components include a social responsibility section with requirements to comply with the rights set by the Ila Declaration and The UNGPs. It discloses specific human rights to be observed. [Code on human rights and working conditions, 12/2020: bmwgroup.com] • Not Met: Company requires suppliers to cascade down to their suppliers
B.1.5	Training on Human Rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Met: How workers are trained on HR policy commitments: The Company states that 'during the year under review, we redesigned or Group-wide mandatory Compliance Essentials online training to create a user-oriented approach with focused content and a high level of interactivity. This training formed part of the mandatory training programme and included human rights topics in the year under report'. It also indicates that 'online training must be completed every two years by relevant target groups, The training modules include exercises and test questions relating to BMW Group legal Compliance Code and corruption prevention, as well as other topics. So far, more than 69.000 employees worldwide have completed

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the Compliance Essentials training [...] Department-specific training modules supplement the extensive options - for instance, in the areas of antitrust law or human rights'. [2021 BMW Group report, 2022: bmwgroup.com] & [2021 GRI Content Index, 2022: bmwgroup.com]</p> <ul style="list-style-type: none"> • Met: Trains relevant managers including procurement: The Sustainable Value report indicates that 'We organise specific training on the subject of human rights. Staff at all human resources departments worldwide have received training on the BMW Group Code on Human Rights. Additional training on human rights topics was also held at our units in various Asian countries, for example. These internal training courses are primarily geared towards managers and focus groups such as purchasing staff'. [Sustainable Value Report 2019, 2020: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment: The Company indicates that 'the BMW Group has been offering training courses aimed at buyers, internal process partners and suppliers since 2012. To raise awareness of social and environmental standards in the supply chain, we explain interdependencies and clearly describe what we expect of the companies we work together with. Moreover, together with partner companies, in selected cases we are breaking new ground with the aim of taking action at the very beginning of the supply chain'. No specific details found, however, on training activity conducted with suppliers in relation to human rights commitments. [2021 BMW Group report, 2022: bmwgroup.com] • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company reports that 'observance and implementation of compliance regulations and processes are subject to regular audits. The BMW Group CMS [Compliance Management system] provides differentiated monitoring levels for this purpose. Compliance Officers are those primarily responsible for performing direct checks in their area of responsibility. [...] The central Group Compliance function refined its audit approach in 2021, with the aim of increasing audit frequency by introducing risk-based compliance audits without cause. These compliance audits are currently focused on antitrust law. So-called Compliance Spot Checks were also carried out in 2021, with a focus on possible corruption risks, Corporate Audit also conducts audits focused on compliance requirements'. Although there is no explicit mention to human rights being covered in these audits, the Company indicates that 'Compliance requirements include human rights compliance (see indicator B.1.1 for a description of CMS scope). The Company indicates that human rights commitments are incorporated in 'the human rights compliance programme'. In relation to supply chain, it indicates that 'we also use standardised online assessments and audits that are integrated in our business processes'. In the context of due diligence (focused on preventive measures following potential risk identification), audits are integrated as well. 'If we identify high-risk suppliers, we conduct additional audits at the supplier's premises with the help of our own assessors and external auditors. In the year under report, we reviewed 200 potential and active supplier locations via this method'. [2021 BMW Group report, 2022: bmwgroup.com] & [Annual Report 2019, 03/2020: annualreport.bmwgroup.com] <ul style="list-style-type: none"> • Not Met: Proportion of supply chain monitored: As indicated above, the Company indicates that reviewed approximately 200 potential and active supplier locations in last reporting year. It is not clear the percentage of the supply chain that this figure represents. [2021 BMW Group report, 2022: bmwgroup.com] • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Met: Describes corrective action process: In addition, it indicates: 'Where potential shortcomings are identified, a Supply Chain Response Team is set up to follow up the issue. Wherever necessary, an escalation process is devised and launched and corrective action plans are developed together with the supplier. Where a supplier fails to take effective action, the BMW Group may potentially terminate the supply contract'. The sustainability questionnaire for suppliers includes comprehensive detail on corrective action process, including traffic light system (nomination not allowed, nomination allowed with restrictions, nomination allowed without restrictions), workflow in the context of corrective action plans

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			<p>and due date in case of gaps, etc. [Code on human rights and working conditions, 12/2020: bmwgroup.com] & [Sustainability requirements - BMW specific evaluation, 04/2022: bmwgroup.com]</p> <ul style="list-style-type: none"> • Not Met: Disclose findings and number of corrective action: The Company indicates that 'during the year under report, the BMW Group identified sustainability deficits at 61% o its suppliers (2020:64%) and agreed on corrective preventive measures'. No further details found, including the number of corrective action processes. The Company indicates in the supply chain transparency and due diligence document that in 2019 assessed 3.921 supplier locations even before issuing the contract ('the number of sites evaluated derives from the bidding circles in the purchasing projects'). For 1,317 sites, we defined corrective preventive measures to minimize potential adverse impacts. However, evidence found refers to a due diligence context of preventing potential impacts. This datapoint looks for evidence of corrective measures for non-compliances found as part of compliance monitoring. [2021 BMW Group report, 2022: bmwgroup.com] & [Supply chain transparency and due diligence, 2021: bmwgroup.com]
B.1.7	Engaging and terminating business relationships	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects selection of suppliers: The Company states in its Code: 'Respecting human rights is an evaluation criterion in the supplier selection process and a component of a three-stage risk management process'. In 2019, we assessed 3.921 supplier locations on the bases of the industry-specific sustainability questionnaire even before signing the contract. The number of sites evaluated derives from the bidding circles in the purchasing projects'. [Code on human rights and working conditions, 12/2020: bmwgroup.com] & [Supply chain transparency and due diligence, 2021: bmwgroup.com] • Met: HR affects on-going supplier relationships: In addition, also in its Code, the Company states: 'Where potential shortcomings are identified, a Supply Chain Response Team is set up to follow up the issue. Wherever necessary, an escalation process is devised and launched and corrective action plans are developed together with the supplier. Where a supplier fails to take effective action, the BMW Group may potentially terminate the supply contract'. [Code on human rights and working conditions, 12/2020: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Not Met: Working with suppliers to meet HR requirements: The Company indicates that it raises 'awareness of social and environmental standards in the supply chain, we explain interdependencies and clearly describe what we expect of the companies we work together with. Moreover, together with partner companies, in selected cases we are breaking new ground with the aim of taking action at the very beginning of the supply chain'. No specific details found, however, of specific working conducted with suppliers to improve meet human rights requirements. The supply chain due diligence documents describes preventive measures required. However, no evidence found of the Company proactively working with them to help them meet requirements. [2021 BMW Group report, 2022: bmwgroup.com] & [Supply chain transparency and due diligence, 2021: bmwgroup.com]
B.1.8	Approach to engagement with affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: In its Stakeholder Engagement Policy, the Company states: '[...] we have developed the "Stakeholder Engagement Policy of the BMW Group." This policy addresses the BMW Group's corporate stakeholder engagement strategy and ensures this strategy is applied consistently across our worldwide operations, including all local operations, National Sales Corporations, and government affairs offices. In addition, it advises our local operations on stakeholder identification, prioritization, and communication, as well as on engagement methods and risk management.' However, no description found on how specifically identified affected stakeholders and engaged with them in the last two years, including human rights. Although the Company describes stakeholder engagement in latest report, no description found to meet the requirements. [Stakeholder Engagement Policy, 03/2020: bmwgroup.com] & [2021 BMW Group report, 2022: bmwgroup.com] • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company describes its Due Diligence Process in its Sustainable Value Report with a Diagram, where a cycle of 6 steps is shown: '[...] 2. Identify and evaluate negative effects in business activities, supply chains and business relations: BMW-specific risk filter, Media screening, Cross-OEM sustainability questionnaire, Third-party (external) sustainability audits, Second-party (internal) sustainability assessments, Supply chain assessments'. [Sustainable Value Report 2019, 2020: bmwgroup.com] • Met: Identifying risks through relevant business relationships: The Company indicates [for the supply chain] that 'we carry out continuous risk analysis based, among other things, on the probability of occurrence, possible severity, our degree of influence as well as our ability to influence potential and actual adverse impacts of our business activities [...] to identify the probability of occurrence and severity of possible adverse impacts, we use a BMW Group-specific risk filter and supplement with standardized risk maps from the Responsible Business Alliance (RBA). The RBA Risk assessment platform is an essential step we use for due diligence efforts to ensure sustainability in our supplier network. This model provides a dynamic assessment methodology of a high-quality, country-specific risk analysis for each supplier location assessed. The assessment models uses various data sources such as UNICEF's Child Labor Index. We combine this risk view with a commodity group-specific view'. [Supply chain transparency and due diligence, 2021: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: As indicated above, the risk analysis is conducted on a continues basis incorporating data and maps from different sources. No further evidence found, including consultation with affected stakeholders and human rights experts. [Supply chain transparency and due diligence, 2021: bmwgroup.com] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describe process for assessment of HR risks and discloses salient HR issues • Met: How process applies to supply chain: The Company indicates [for the supply chain] that 'we carry out continuous risk analysis based, among other things, on the probability of occurrence, possible severity, our degree of influence as well as our ability to influence potential and actual adverse impacts of our business activities [...] to identify the probability of occurrence and severity of possible adverse impacts, we use a BMW Group-specific risk filter and supplement with standardized risk maps from the Responsible Business Alliance (RBA). The RBA Risk assessment platform is an essential step we use for due diligence efforts to ensure sustainability in our supplier network. This model provides a dynamic assessment methodology of a high-quality, country-specific risk analysis for each supplier location assessed. The assessment models uses various data sources such as UNICEF's Child Labor Index. We combine this risk view with a commodity group-specific view'. It discloses maps and charts showing risks by region/country with regard to the provability of occurrence and severity of potential adverse impacts of the Company's business activities on affected parties. [Supply chain transparency and due diligence, 2021: bmwgroup.com] • Met: Public disclosure of the results of HR assessment: The Company discloses a map where it indicates the following 'we have identified the following potential risks at direct suppliers, which may arise due to the location of their production sites in procurement countries such as Mexico, Turkey or Poland, o the basis of the probability of occurrence, severity and our degree of influence measured in terms of purchasing volume'. The map includes countries, topics of risk and level of risk. Risks include freedom of association, forced labor, occupational health and safety, fire safety, accident rate, remuneration, child labor, migrant workers, etc. [Supply chain transparency and due diligence, 2021: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Action Plans to mitigate risks • Met: Description of how global system applies to supply chain: Following up on the process described in previous indicators, the Company indicates that identifies supplier location-related risks and assess supplier location and evaluates sites before issuing the contract, establishing preventive measures to minimize potential adverse impacts: 'Preventive measures we require depending on company size include: A person with primary responsibility for social sustainability, the publication of a CSR/sustainability report, a policy on working conditions and human rights, an occupational health and safety guideline, a certified occupational health and safety management system according to ISO 45001 or comparable, an environmental guideline, as well as a certified environmental management system'. The company indicates that these are the measures in place when potential risks described in B.2.2 are identified and considered relevant. [Supply chain transparency and due diligence, 2021: bmwgroup.com] • Met: Example of actions decided on at least 1 salient HR issues: As indicated above, occupational health and safety, accident rate, fire safety risks are considered relevant in some countries and locations. In cases where these potential risks re identified, preventive measures require occupational health and safety guideline and establish a health and safety management system certified according to ISO 45001 or comparable. [Supply chain transparency and due diligence, 2021: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: System for tracking or monitor if actions taken are effective: In the context of supply chain, the Company describes the sourcing strategy and how due diligence with preventive measures are monitored. Target achievement (of preventive, nor corrective), i.e. the fulfilment of our due diligence requirements, is measured at an agreed date prior to the start of production is reported to the Board of Management. It is part of the BMW Group PSC target system. By integrating due diligence tools into the procurement process and agreeing and continuously measuring PSC targets, we achieve a high level of implementation of preventive measures. • Not Met: Lessons learnt from checking system effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: In its Code, the Company indicates: 'The BMW Group has two points of contact for dealing with questions and concerns relating to human rights. The BMW Group Compliance Contact helpline is available to answer questions and queries about the BMW Group Human Rights Code and advises on assessing possible breaches and on what to do next. [...] Additionally the BMW Group offers its employees the opportunity to report potential human rights concerns anonymously and confidentially via the BMW Group SpeakUP Line. This service is available in all countries where BMW Group employees operate. [Code on human rights and working conditions, 12/2020: bmwgroup.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages and workers aware: With respect its SpeakUp Line, the Company indicates: 'This service is available in all countries where BMW Group employees operate. It can be reached around the clock via a local toll-free number and operates in 34 languages'. The Company states that 'during the year under review, we redesigned or Group-wide mandatory Compliance Essentials online training to create a user-oriented approach with focused content and a high level of interactivity. This training formed part of the mandatory training programme and included human rights topics in the year under report'. [Code on human rights and working conditions, 12/2020: bmwgroup.com] & [2021 BMW Group report, 2022: bmwgroup.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: The Supplier sustainability policy states that in case of potential violations of the policy, 'the BMW Group has implemented a grievance mechanism, which is available by phone under +4989382-71230 or by e-mail under humanrights.sscm@bmwgroup.com [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] • Met: Expect Suppliers to convey expectation to their own suppliers: The supplier sustainability policy states that 'all suppliers are called upon to implement a due diligence process themselves, to ensure that their contractors and sub-contractors comply with the standards and rules set out in this document, as well'. [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism for community: The Human Rights code states that 'The BMW Group has two points of contact for dealing with questions and concerns relating to human rights. The BMW Group Compliance Contact helpline is available to answer questions and queries about the BMW Group Human Rights Code and advises on assessing possible breaches and on what to do next. Employees can call the helpline from Monday to Friday, 7.00 hrs. to 20.00 hrs. (Central European Time). Services are available in English and German and calls will be treated confidentially'. It is not clear whether the helpline is available to external stakeholders including communities. The second mechanism refers exclusively to employees. [Code on human rights and working conditions, 12/2020: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness • Not Met: Communities access mechanism direct or through suppliers • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engages users to create or assess system [Code on human rights and working conditions, 12/2020: bmwgroup.com] • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Response timescales and how complainants will be informed • Not Met: Describe support (technical, financial, etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level
C.5	Prohibition of retaliation for raising complaints or concerns	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The company states that 'The BMW Group protects information providers in two ways. If they prefer, individuals may provide information without disclosing their identity. Policy also stipulates that no one providing information should face retaliatory action.' [2021 BMW Group report, 2022: bmwgroup.com] • Met: Practical measures to prevent retaliation: The Company indicates that 'BMW Group offers its employees the opportunity to report potential human rights concerns anonymously and confidentially via the BMW Group SpeakUp Line.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Alternatively, employees can report their concerns online'. [Code on human rights and working conditions, 12/2020: bmwgroup.com] Score 2 <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions Score 2 <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes how remedy has been provided • Met: Says how it would provide remedy for victims if no adverse impact identified: The company states that 'All control checks are geared towards reducing compliance risks for the BMW Group. Any infringements are immediately remedied, with an emphasis on minimising the risk of repeat offenses and strengthening the understanding of compliance within the Company. Where incidences of non-compliance can be traced to an individual, such persons will be appropriately sanctioned, in accordance with the processes defined for this purpose.' [2021 BMW Group report, 2022: bmwgroup.com] Score 2 <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved • Not Met: How lessons from mechanism improve management system Score 2 <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

D.5 Automotive Manufacturing

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Pays living wage or sets target date: The Company states in its Code: 'Employees are remunerated fairly by both internal and external standards. Uniform principles provide the foundation for a well-balanced global rewards system. Where legislation exists, the BMW Group pays its employees at least the legal minimum wage applicable in the economic area concerned. It also strives to provide its employees with above-average remuneration overall (consisting of salaries and fringe benefits) compared with the rest of the local employment market.' However, no reference found to living wage. [Code on human rights and working conditions, 12/2020: bmwgroup.com] • Not Met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not Met: Paying living wage • Not Met: Definition of living wage reviewed with unions

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Discloses living wage requirements in supplier code or contracts: The Company's General Terms and Conditions for Purchasing indicates in the Section 'Social Responsibilities': 'The following principles are of particular importance: [...] Remuneration, which permits employees to secure their livelihoods including their social and cultural participation'. The Supplier sustainability policy requires 'compliance with all applicable labor regulations e.g. regarding working hours, wages and benefits and work safety'. However, no reference found to living wage. [Terms and Conditions for the Purchase of Production Materials and Automotive Components, 31/03/2018: b2b.bmw.com] & [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] • Not Met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.5.2	Aligning purchasing decisions with human rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Avoids business model pressure on HRs (purchasing practices): The company states that: 'For BMW it is of paramount importance that corporate activities take account of the social responsibility to employees and to society as a whole. This applies both to BMW itself and to its suppliers. BMW and the Contractor acknowledge their compliance with the adopted principles and rights set by the International Labour Organisation (ILO) in its "Declaration on fundamental principles and rights at work" (Geneva 06/98), the Directives of the UN Initiative Global Compact (Davos, 01/99) and the UN Guiding Principles on Business and Human Rights (2011).'" [General terms and conditions for indirect purchasing, 11/2021: b2b.bmw.com] • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
D.5.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company indicates that is involved 'in standardization initiatives such as the GAIA X partner platform and is actively driving the expansion of the IMDS database with the goal of obtaining traceability on occasion-related basis to environmental and social standards'. This evidence seems to refer to mineral and raw materials. No further evidence found of mapping of the complete supply chain, including both direct and indirect suppliers. [Supply chain transparency and due diligence, 2021: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why: The Company discloses refiners and countries in relation to cobalt supply chain. No further details found on names and locations of the most significant parts of the supply chain. [Supply chain transparency and due diligence, 2021: bmwgroup.com] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.5.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Does not use child labour: The Company states in its Code: 'The BMW Group does not tolerate child labor of any kind. A child's development must not be hampered by undertaking any kind of work that keeps them from receiving an education. Their dignity must be respected and their health and safety protected. In accordance with ILO Core Conventions, the BMW Group adheres to minimum employment ages and fully rejects child labor, in particular all worst forms of child labor, i.e. dangerous work that can harm the health, safety or morals of children'. [Code on human rights and working conditions, 12/2020: bmwgroup.com] • Not Met: Age verification of workers recruited <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remediation if children identified

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Child Labour rules in codes or contracts: The Company's General Terms and Conditions for Purchasing indicates in the Section 'Social Responsibilities': 'The following principles are of particular importance: [...] Elimination of forced, compulsory, and child labor,[...]'. Similar evidence can be found in the Supplier sustainability policy. However, no reference found to child labour requirements including age verification of job applicants and worker remediation programmes. [Terms and Conditions for the Purchase of Production Materials and Automotive Components, 31/03/2018: b2b.bmw.com] & [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] Not Met: How working with suppliers on child labour Score 2 <ul style="list-style-type: none"> Not Met: Assessment of number affected by child labour in supply chain Not Met: Analysis of trends in progress made
D.5.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Job seekers and workers do not pay recruitment fee Not Met: Commits to fully reimbursing if they have paid Score 2 <ul style="list-style-type: none"> Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters
D.5.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Debt and fees rules in codes or contracts: The Company's General Terms and Conditions for Purchasing indicates in the Section 'Social Responsibilities': 'The following principles are of particular importance: [...] Elimination of forced, compulsory, and child labor,[...]'. However, no references found to debt bondage requirements, such as: refraining from imposing any financial burdens on workers by withholding wages or expenses including recruitment fees and related recruitment costs. Similar evidence found in Supplier sustainability policy [Terms and Conditions for the Purchase of Production Materials and Automotive Components, 31/03/2018: b2b.bmw.com] & [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] Not Met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> Not Met: Assessment of the number affected by payment of recruitment fees Not Met: Analysis of trends in progress made
D.5.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Pays workers in full and on time Not Met: Payslips show any legitimate deductions Score 2 <ul style="list-style-type: none"> Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.5.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts Not Met: How working with supply chain to pay workers regularly and on time Score 2 <ul style="list-style-type: none"> Not Met: Assessment of the number affected by failure to pay directly Not Met: Provides analysis of trends demonstrating progress
D.5.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Does not retain documents or restrict movement: The Company states in its Code: 'The BMW Group does not tolerate forced or compulsory labor of any kind. In accordance with ILO Core Labor Standards, the BMW Group opposes the use of forced or unlawful compulsory labor of any kind in its business activities'. However, no specific provision related to freedom of movement found (no retain personal documents, not restrict workers' freedom of movements outside work hours or require workers to stay at and pay for accommodation by the Company). [Code on human rights and working conditions, 12/2020: bmwgroup.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.5.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Free movement rules in codes or contracts: The Company's General Terms and Conditions for Purchasing indicates in the Section 'Social Responsibilities': 'The following principles are of particular importance: [...] Elimination of forced, compulsory, and child labor,[...]'. However, no reference found to requirements on workers' freedom of movements, such as: refraining from restricting workers' movements through retention of passports or other personal identification or travel documents or bank payment cards or similar arrangements for accessing wages or other measures to physically restrict movement. [Terms and Conditions for the Purchase of Production Materials and Automotive Components, 31/03/2018: b2b.bmw.com] & [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] • Not Met: How working with suppliers on free movement Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
D.5.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Company indicates in its Code: 'The BMW Group recognizes the rights of its employees to form representative bodies and participate in collective bargaining regarding working conditions. [...] Even on controversial issues, it aims to maintain stable collaborations with representative bodies for its own interests as well as for the good of its employees. Employees are neither shown preference nor disadvantaged for either belonging or choosing not to belong to a trade union or employee representative body. Where a facility has no applicable employee representatives, the BMW Group promotes a regular dialogue between the workforce and the company'. Despite not having found an total percentage of workers covered by collective bargaining agreements, as indicated below is over 80% in all countries but the USA and South Africa (which represents approximately 12% of the total workforce). High percentage of coverage is considered a proxy for not retaliating in practice. [Code on human rights and working conditions, 12/2020: bmwgroup.com] & [Sustainable Value Report 2019, 2020: bmwgroup.com] • Met: Discloses % total direct operations covered by collective CB agreements: The Company discloses the percentage of employees covered by a collective bargaining agreement per country: Germany (100%), UK (85%), China (plant) (100%), Austria (100%), South Africa (59%), USA (0%), Mexico (100%). Despite not providing a global percentage of coverage, the Company discloses the number of employees per country. [Sustainable Value Report 2019, 2020: bmwgroup.com] Score 2 <ul style="list-style-type: none"> • Met: Meets both requirements under score 1
D.5.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: FoA & CB rules in codes or contracts: The Company's General Terms and Conditions for Purchasing indicates in the Section 'Social Responsibilities': 'The following principles are of particular importance: [...] Positive and negative freedom of association,[...]'. However, no reference found to collective bargaining and prohibiting intimidation, harassment, retaliation and violence against trade union members and trade union representatives. [Terms and Conditions for the Purchase of Production Materials and Automotive Components, 31/03/2018: b2b.bmw.com] & [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] • Not Met: How working with suppliers on FoA and CB Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes process to identify H&S risks and impacts: The Company indicates that 'in order to identify work-related risks in both production facilities and offices, the BMW Group conducts wide-ranging risk and stress analyses. Furthermore, the BMW Group continually assesses and improves occupational health and safety at all its locations based on recognized management systems such as ISO 45001 or OHRIS, via occupational health and safety committees and by way of in-house risk assessments. On the basis of these management systems, the BMW Group regularly evaluates all the methods and instruments used within the company. The results of the evaluations are applied to improve internal standard specifications. Among other things the improvement of the accident frequency rate (AFR) of our internal and external employees in recent years reveals the success of the measures taken'. [Accident frequency rate BMW Group 2020, 07/20221: bmwgroup.com] • Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The Company discloses information about its 'Accident frequency rate' in its Group Report for the last 5 years (3.5 in 2019). [2021 BMW Group report, 2022: bmwgroup.com] • Met: Discloses Fatalities for last reporting period: There were no fatal accidents during the reporting year (2020: one) [Sustainable Value Report 2019, 2020: bmwgroup.com] • Not Met: Occupational disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance • Not Met: Met targets or explain why not or what is doing to improve management systems: The Company indicates: 'The target we set ourselves in 2011 of halving the accident frequency rate by 2020 was already achieved in 2015. And we will continue to work on further reducing it in the future'. No further details found on targets or steps taking to improve management systems. [Sustainable Value Report 2019, 2020: bmwgroup.com] & [2021 BMW Group report, 2022: bmwgroup.com]
D.5.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: The Company's General Terms and Conditions for the purchase indicates: 'Seller shall at the latest by start of production (SOP), implement, operate and prove to Buyer by presentation of a corresponding certificate, a certified occupational health and safety management system in accordance with "OHSAS 18001" or "ISO 45001" or a recognized and certified occupational health and safety management system derived therefrom'. Similar requirements found in the Supplier sustainability policy. [Terms and Conditions for the Purchase of Production Materials and Automotive Components, 31/03/2018: b2b.bmw.com] & [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period • Not Met: Fatalities disclosures for lasting reporting period • Not Met: Occupational disease rates for the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provide analysis of trends in progress made
D.5.8.a	Women's rights (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Process to stop harassment and violence against women: In its Legal Compliance Code, the Company states: 'All forms of workplace harassment, including sexual harassment, are strictly prohibited. Everyone has the right to be protected from harassment, no matter if the alleged harasser believes that his or her behaviour is acceptable or whether the alleged victim would be capable of avoiding the harassment.' However, no details found on how the Company implements this provision applied to violence against women. [Legal Compliance Code, 11/2019: bmwgroup.com] • Not Met: Working conditions take account of gender

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Measures and steps to address gender pay gap at all levels of employment: The Company indicates on its website that 'By 2025, the BMW Group aims to increase the proportion of women in the workforce in general as well as in management positions to between 20 % and 22 %. BMW AG is aiming for a proportion of 17 % to 19 % of women in the total workforce and 19 % to 21 % in management positions. To achieve this target, BMWAG carefully analysed the effectiveness of its existing measures and programmes during the year under report, focused on specifically optimising them to suit requirements and derived new measures. These include, for example, new formats for the targeted promotion of young female managers and the option of filling management positions with two people at the same time in a form of joint leadership. In addition, the BMW Group ensures a high proportion of women in its young talent promotion programmes and is committed to a seamless return to working life after parental leave'. No evidence found on specific steps to address pay gap. [Employees on website, N/A: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meet all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap
D.5.8.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts • Not Met: How working with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provide analysis of trends in progress made
D.5.9.a	Working hours (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Respects max hours, min breaks and rest periods in its own operations: The Company's Code indicates: 'The BMW Group complies with national legal working time regulations as a minimum requirement. In addition, our working time principles describe the BMW Group values for employees resting times, leisure, holiday and a healthy life balance. They support BMW Group entities worldwide in designing working time schedules. Working times and break times take into account not only business but also personal needs.' However, there is no reference to international standards or clarifying that maximum working hours for a regular working week must not exceed 48 hours. [Code on human rights and working conditions, 12/2020: bmwgroup.com] • Not Met: Assesses ability to comply with its commitments when allocating work/targets <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How it implements and checks this in its operations
D.5.9.b	Working hours (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Working hours in codes or contracts: The Supplier sustainability policy requires 'compliance with all applicable labor regulations e.g. regarding working hours, wages and benefits and work safety'. No further details found including ILO standards related requirements in supplier codes/contracts. [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] • Not Met: How working with suppliers on working hours <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by excessive working hours • Not Met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.10.a	Responsible Mineral Sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Due diligence in accordance with OECD Guidance in supplier contracts: In its Supplier Sustainability Policy, the Company indicates: 'With regard to raw materials, such as tin, tungsten, tantalum and gold (3TG) from conflict-affected and high-risk areas (CAHRAs) like the Democratic Republic of the Congo (DRC), as well as other raw materials, such as cobalt, lithium, copper etc., we established processes in accordance with the 'OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas' and expect our suppliers to do the same. Smelters and refiners without adequate, audited due diligence processes in place shall be avoided'. However, no reference found to this policy in the General Terms and Conditions for the Purchasing, or other binding agreements. [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] & [Terms and Conditions for the Purchase of Production Materials and Automotive Components, 31/03/2018: b2b.bmw.com] • Not Met: Works with smelters/refiners and suppliers to build capacity: The Company indicates that: 'The cross-industry Cobalt for Development initiative began training sessions for twelve micro-mining cooperatives in Kolwezi, Democratic Republic of Congo (DRC), in October 2020. The trainings cover key environmental, social and governance aspects of responsible mining practices. They include mine site management and legal compliance, human rights, health and safety, and environmental management. The initiative aims to train more than 1.500 miners from micro mines by mid-2021'. The Company indicates that measures taken include raise awareness among Tier 1 suppliers through direct contact, information and training'. However, no further details found on this direct supplier training. [Supply chain transparency and due diligence, 2021: bmwgroup.com] & [Anchoring due diligence in the supply chain, N/A: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Contractual requirement to disclosure smelter/refiner information: In addition, the Company indicates: 'Upon request, suppliers shall disclose their supply chain including information on the origin of the material, e.g. via the 'Responsible Minerals Assurance Process' (RMAP) by the RMI.' However, it is not clear that this requirement is included in a contractual agreement. [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] • Not Met: Contractual requirement covers all minerals
D.5.10.b	Responsible Mineral Sourcing: Risk identification in mineral supply chain	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Risk identification and disclosure in line with OECD Guidance: The Company states in its 'Complying with due diligence in supplier selection' document: 'In relation to conflict minerals, the BMW Group has introduced a process for complying with due diligence based on OECD Due Diligence Guidance. For each request for a quotation we use our sustainability questionnaire, which contains a separate section for conflict minerals. All affected suppliers must upload a valid Conflict Mineral Reporting Template (CMRT). In cases of non-compliance with our due diligence requirements an escalation process will be carried out. [...] All 3TG suppliers then receive detailed feedback concerning the status of their smelters and refineries, including suggestions for improving 3TG management. In addition, we aim to achieve full transparency (response rate) in terms of affected suppliers through our financial and personal involvement in the Responsible Mineral Initiative (RMI). We thus support the cross-industry Conflict Free Smelter (CFS) programme, in order to significantly increase the number of conflict-free smelters and refineries over the next few years'. On its website, the Company describes the areas of application and human rights risks identified, which include: 'Human rights abuses in connection with 3TG extraction, transportation or trade; Child and forced labour; Direct or indirect support for non-state armed groups or public or private security forces; Human rights abuses by public or private security forces; Violation of workers' rights; Discrimination and harassment, including against vulnerable groups; Risks to worker health and safety; Threats to indigenous peoples and communities Negative environmental impacts'. [Complying with due diligence in supplier selection, 06/2019: bmwgroup.com] & [Anchoring due diligence in the supply chain, N/A: bmwgroup.com] • Met: Identification of smelter/refiners and OECD Guidance: As indicated above, 'all affected suppliers must upload a valid Conflict Mineral Reporting Template (CMRT). In cases of non-compliance [...]. All 3TG suppliers then receive a detailed feedback concerning the status of their smelters and refineries'. [Complying with due diligence in supplier selection, 06/2019: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses smelters/refiners judged in line with OECD Guidance

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Risk identification and disclosure covers all minerals
D.5.10.c	Responsible Mineral Sourcing: Risk management in the mineral supply chain	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Describes mineral risk management plan for supply chain: The Company reports some measures to 'eliminate, avoid or mitigate identified adverse impacts on affected parties' in the context of 3TG, such as closing material cycles. In the context of tungsten, it states (2021 Group Report) that: 'since the year under report, the BMW Group has been reducing the amount of the primary raw tungsten it requires by introducing a closed material cycle. To achieve this aim, we collect discarded drill and screw inserts in our German and Austrian plants, recycle them, and have new tools manufactured from the secondary raw material obtained. Apart from reducing our consumption of primary raw materials, the strategy also cuts carbon emissions'. It also indicates that 'the BMW Group has reduced the amount of primary raw material [3tG context] required for tools by 80% since 2021. The remaining primary raw material comes from a certified conflict-free smelting plant. We collect old drill and screw bits for recycling at our plants in Germany and Austria, then use the secondary raw material obtained from this to make new tools. In addition to reducing consumption of primary raw materials, this also reduces CO2 emissions by up to 60%'. Another measure described: 'Raise awareness among Tier 1 suppliers through direct contact, information and training. The aim is to improve the quality of traceability and steadily increase the percentage of certified smelting plants in the supply chain'. It also discloses training conducted in cobalt mines in collaboration with multi-stakeholder initiative (see indicator D.4.10.a)'. [Anchoring due diligence in the supply chain, N/A: bmwgroup.com] & [Supply chain transparency and due diligence, 2021: bmwgroup.com] • Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time • Not Met: Disclose better risk prevention/mitigation over time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Suppliers and stakeholders engaged in risk management strategy • Not Met: Risk management and response processes cover all minerals
D.5.11	Responsible Materials Sourcing	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Due diligence for raw materials in supplier code/contracts: The Company indicates that 'We aim to use only raw materials in our products, whose extraction, production, transport, trade, processing and export neither directly nor indirectly contribute to human rights abuses, health & safety issues, environmental pollution or compliance breaches. With regard to raw materials, such as tin, tungsten, tantalum and gold (3TG) from conflict-affected and high-risk areas (CAHRAs) like the Democratic Republic of the Congo (DRC), as well as other raw materials, such as cobalt, lithium, copper etc., we established processes in accordance with the 'OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas' and expect our suppliers to do the same. [...] Raw materials should be obtained from audited sources as a matter of principle wherever possible, using independent, third-party assurance, such as the Standard for Responsible Mining from the 'Initiative for Responsible Mining Assurance' (IRMA). The BMW Group participates in multi-stakeholder initiatives which aim to establish the standards set out in this document in raw material supply chains and expects its suppliers also to be active in this kind of activities whenever relevant and necessary.' In addition, it states: 'we have been supporting the Aluminium Stewardship Initiative (ASI) since December 2012. [...] The goal of ASI is to establish a standard for responsibly produced aluminium across the entire value chain: from responsible company management to compliance with environmental standards to social standards. [...] Renewable raw materials grow in forests, plantations and on fields, where BMW's sustainability standards must also be guaranteed. [...] Taking sustainability certificates into account when selecting materials guarantees compliance with basic principles with respect to social, environmental and compliance issues and is recognised worldwide. We will continue and intensify these efforts to develop a sustainable and transparent supply chain for natural materials by engaging in dialogue and cooperation with our suppliers [...]'. However, no evidence found of due diligence for raw material provision in the Company's General Terms and Conditions for the Purchase, or the expectation/requirement of due diligence for raw materials being a contractual requisite. [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] & [Terms and Conditions for the Purchase of Production Materials and Automotive Components, 31/03/2018: b2b.bmw.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Works with suppliers to build capacity in risk assessment and due diligence: The Company describes different initiatives and strategies it is implementing with respect raw materials and supply chain in its Sustainable Value Report: 'Steel and Aluminium. [...] we had an audit carried out as an industrial user at our light metal foundry in Landshut according to the performance standard and we are working very closely with our partners in the supplier network on gaining certification for the remaining links in the supply chain, all the way upstream to the mine. [...] Cobalt. [...] In the Congo, we are involved in the "Cobalt for Development" pilot project, [...] we are promoting responsible artisanal cobalt mining. [...]Copper. [...] we have initiated several pilot projects to make the copper supply chain for the vehicles' electrical system more transparent. Together with our suppliers DRÄXLMAIER Group and LEONI AG we have mapped all steps in the supply chain and visited cable production, copper processing and mining locations. We are using the results from these activities to develop solutions in collaboration with stakeholders from politics, society and industry. [Sustainable Value Report 2019, 2020: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Identify the sources of high-risk raw materials in its supply chain: The Company describes how it performs due diligence to achieve full supply chain transparency for cobalt. The Company discloses the name and location (country) of the different smelters and refiners for the cobalt supply chain. It also discloses activities/measures to eliminate, avoid or mitigate identified adverse impacts on affected parties in raw material supply chains. However, no further evidence found on whether it identifies the sources of high-risk raw materials in tis supply chain (e.g. farm, ranch). [Supply chain transparency and due diligence, 2021: bmwgroup.com]

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Child labour, forced labour, health & safety, environmental damage • Headline: BMW faces child labour claims in its supply chain in the Democratic Republic of Congo • Story: On November 15, 2017, Amnesty International, a Human Rights NGO, released a report which reveals that electronic and electric vehicle companies, including BMW, are still not doing enough to stop human rights abuses entering their cobalt supply chains. The report assessed the policies and practices of 29 companies and how much their cobalt-sourcing practices have improved since its previous report published in January 2016. More than half of the world's cobalt, a key element in lithium-ion batteries, is from the Democratic Republic of Congo (DRC), where Amnesty has found human rights abuses. Amnesty International stated that about a fifth of the country's cobalt production is mined by informal miners including children, often in dangerous conditions. The electronics companies and the automobile manufacturers included in the report are: Apple, Samsung SDI, Dell, HP, BMW, Tesla, LG Chem, Sony, Samsung Electronics, General Motors, Volkswagen, Fiat-Chrysler, Daimler, Hunan, Shanshan, Amperex Technology, Tianjin Lishen, Microsoft, Lenovo, Renault, Vodafone, Huawei, L&F, Tianjin B&M, BYD, Coslight, Shenzhan BAK and ZTE. In 2019 several press sources reported that BMW will buy cobalt directly from Australian and Moroccan mining companies to avoid any potential child labour practices in its supply chain. [Amnesty International, 15/11/2017, "Democratic Republic of the Congo: Company responses to Amnesty International regarding cobalt in their supply chains": amnesty.org] [Reuters, 15/11/2017, "Apple leads way in tracing cobalt from Congo, Microsoft lags: Amnesty": reuters.com] [Reuters, 23/04/2019, "BMW to buy cobalt direct from Australia, Morocco for EV batteries": reuters.com]
E(1).1	The company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Public response: The Company responded to Amnesty International, however, the response does not include recognition of the allegation of the use of child labour in its supply chain. Instead, the response explains Company policies to address risks related to mineral mining. [Amnesty International, 15/11/2017, "Company Responses": amnesty.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).2	The company has investigated and taken appropriate action	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Engaged with stakeholders: In its response to Amnesty, it stated that 'BMW Group supported an independent academic research project conducted by the Center for Effective Global Action (CEGA) at the University of Berkeley together with several other companies. The research of the UC Berkeley aims to provide rigorous empirical data on households engaged in artisanal mining, and it involves collecting survey data from households, children, village leaders, and local mineral traders in 150 communities that are representative and cover the full geographical extent of the DRC Copper Belt'. As it is difficult to engage otherwise with the affected stakeholders, CHRB accepts this as engagement. [Amnesty International, 15/11/2017, "Company Responses": amnesty.org] • Met: Identified cause: The CEGA presented a report that outlined several underlying issues as the causes for prevalent child labour in the mining sector in the DRC. [UC Berkeley, 06/05/2017, "Artisanal Mining, Livelihoods, and Child Labor in the Cobalt Supply Chain of the Democratic Republic of Congo": escholarship.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: BMW is part of the Cobalt for Development (C4D), a piloting project aimed at improving the conditions of artisanal miners and their communities in the democratic Republic of Congo. The pilot project was launched in 2020. Additionally, in 2021, BMW claimed to no longer source cobalt from the DRC, but instead only buy it directly from mines in Australia and Morocco to eliminate the risk of child labour in its supply chain. [Cobalt for Development website, "About us": cobalt4development.com] [Reuters, 23/04/2019: reuters.com] • Not Met: Stakeholder input to steps taken: While the C4D claims to be working with miners and communities, there is no indication that it was designed with input from affected stakeholders. Without input from stakeholders in the compilation of the project, there is a remaining risk of the project not addressing the right issues and not understanding the underlying causes that need to be addressed. There is no information available as to whether the decision to no longer source cobalt from the DRC was informed by stakeholder input. [Cobalt for Development website, "About us": cobalt4development.com] [Reuters, 23/04/2019: reuters.com]
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy: The company has terminated sourcing from the DRC to ensure it is no longer linked to child labour. However, there is no evidence available that suggests the company provided remedy to affected stakeholders for the violations that already occurred. [Reuters, 23/04/2019: reuters.com] • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: The company has terminated sourcing from the DRC to ensure it is no longer linked to child labour. However, there is no evidence available that suggests the company provided remedy to affected stakeholders for the violations that already occurred. [Reuters, 23/04/2019: reuters.com] • Not Met: Remedy delivered: The company has terminated sourcing from the DRC to ensure it is no longer linked to child labour. However, there is no evidence available that suggests the company provided remedy to affected stakeholders for the violations that already occurred. [Reuters, 23/04/2019: reuters.com] • Not Met: Independent remedy process used
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Land Rights • Headline: Leather supply chain of BMW and Jaguar Land Rover linked to deforestation • Story: In October 2020, the NGO Earthsight published a report detailing how massive legal and illegal deforestation of Chaco forests underpins Paraguay's burgeoning cattle ranching sector, as fires raged across the country, including near the capital Asuncion. The government reported that 50,000 hectares (ha) of the Chaco region in the country's north was destroyed. <p>On 3 October 2020, Paraguay's Volunteer Fire Department said they suspected 90 per cent of the blazes were lit intentionally for profit. Earthsight revealed that three ranches operating illegally in the region and linked to BMW and Jaguar Land Rover suppliers were affected.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>The report focused on illegal deforestation in cattle ranches inside the forest reserve of the Ayoreo Totobiegosode, the last uncontacted peoples in the Americas outside of the Amazon. Earthsight documented how hides from cattle grazed in the reserve (known as PNCAT) enter the leather supply chains of some of Europe's leading luxury car firms, including BMW and Jaguar Land Rover.</p> <p>From the 8 to 16 October 2020, 89 percent of the PNCAT fire hotspots were in areas Earthsight found were illegally cleared in 2018 and 2019 by the ranches Caucasian and Chortitzer that the Earthsight report 'Grand Theft Chaco' revealed as supplying facilities in the leather supply chains of BMW and JLR.</p> <p>In response to the allegations BMW announced that it will drop raw leather from Latin America in the medium term. [Earthsight, 2020, "Fires detected in Paraguay farms linked to BMW and JLR leather supply": earthsight.org.uk] [Earthsight, 2020, "Grand Theft Chaco: The luxury cars made with leather from stolen lands of an uncontacted tribe": earthsight.org.uk] [Business & Human Rights Resource Centre, 15/11/2021, "Grand Theft Chaco II: The Vice Continues": business-humanrights.org]</p>
E(2).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Public response: The company stated: "so far, we have no information that the BMW Group's leather supply chains in Latin America are affected by the problems presented". The company said it was exploring options for extending traceability systems further for leather from South America, but its "medium-term strategy" is to phase out leather from the region altogether. [Earthsight, 2020, "Grand Theft Chaco: The luxury cars made with leather from stolen lands of an uncontacted tribe": earthsight.org.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The company stated: "so far, we have no information that the BMW Group's leather supply chains in Latin America are affected by the problems presented". The company said it was exploring options for extending traceability systems further for leather from South America, but its "medium-term strategy" is to phase out leather from the region altogether. However, the company fails to directly address the human rights violations that occurred, in particular the aspect that the deforestation allegedly occurs inside the forest reserve of the Ayoreo Totobiegosode, the last uncontacted peoples in the Americas outside of the Amazon [Earthsight, 2020, "Grand Theft Chaco: The luxury cars made with leather from stolen lands of an uncontacted tribe": earthsight.org.uk]
E(2).2	The Company has appropriate policies in place	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: The company stated: "With regard to the sourcing of leather from South America, the BMW Group already took initial measures several years ago and began to restructure the leather supply chains. In recent years we have steadily reduced the sourcing of leather from South America, including Paraguay. From 2023 on we will no longer have leather from Paraguay in our supply chain". However, as they have not been mandated by the community, these organisations cannot be considered legitimate representatives. [Business & Human Rights Resource Centre, 15/11/2021, "Grand Theft Chaco II: The Vice Continues": business-humanrights.org] • Met: Identified cause: The company stated: "We have already taken the first Earthsight report (published in 2020) very seriously and have engaged external companies to provide transparency down to the origin of our leather supply chain. For this we worked with Satelligence (satelligence.com) and Sourcecmap (sourcecmap.com) who used satellite data, big data analysis and risk assessments for the evaluation. Both partners have confirmed that our supply chain is not related to deforestation in Paraguay. Earthsight's accusations are not accurate". [Business & Human Rights Resource Centre, 15/11/2021, "Grand Theft Chaco II: The Vice Continues": business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: The company announced it will drop raw leather from Latin America in the medium term. [Earthsight, 2020, "Grand Theft Chaco: The luxury cars made with leather from stolen lands of an uncontacted tribe": earthsight.org.uk] • Not Met: Stakeholder input to steps taken: There is no evidence suggesting that the views of affected people were taken into account in the improvement of the company policies.

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(2).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link: The company denies being linked to the allegation, claiming "We have already taken the first Earthsight report (published in 2020) very seriously and have engaged external companies to provide transparency down to the origin of our leather supply chain. For this we worked with Satellintelligence [...] and Sourcemap [...], who used satellite data, big data analysis and risk assessments for the evaluation. Both partners have confirmed that our supply chain is not related to deforestation in Paraguay. Earthsight's accusations are not accurate". However, this is not sufficient evidence the company is not linked to the impact, in particular since the company refuses to provide further information on these audits. [Business & Human Rights Resource Centre, 15/11/2021, "Grand Theft Chaco II: The Vice Continues": business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used: Third party audits that are commissioned by the company do not qualify as independent processes under this datapoint.
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Area: Environmental rights; land rights • Headline: BMW among others accused of abuses of Aluminium supply chains • Story: On July 22, 2021, Human Rights Watch and Inclusive Development International said in a report that Automobile companies need to do more to address abuses in their aluminium supply chains and the bauxite mines they source from. Car manufacturers used nearly a fifth of all aluminium consumed worldwide in 2019 and they are forecast to double their aluminium consumption by 2050 as they transition to electric vehicles. <p>In its report the Human Rights Watch and Inclusive Development International describes the global supply chains that connect car manufacturers to mines, refineries, and smelters from countries including Guinea, Ghana, Brazil, China, Malaysia, and Australia. Based on meetings and correspondence with nine major car companies – BMW among others (Renault, Daimler, Ford, General Motors, Groupe PSA (now part of Stellantis), Toyota, Volkswagen, and Volvo) – Human Rights Watch and Inclusive Development International assessed how the auto industry addresses the human rights impacts of aluminium production, from the destruction of farmland and damage to water sources caused by mines and refineries to the significant carbon emissions from aluminium smelting. Although car companies' knowledge of aluminium supply chains varies, none of the nine companies that responded to Human Rights Watch and Inclusive Development International had, prior to being contacted for this report, mapped their aluminium supply chain to understand the human rights risks within it</p> <p>The report also alleged despite many of the world's leading car companies have publicly committed to addressing human rights abuses in their supply chains, they have done little to evaluate and address the human rights impact of aluminium production. They have instead prioritized supply chain due diligence for other materials central to electric vehicles, such as the cobalt needed for electric batteries. Because they involve surface level mining, bauxite mines take up a large area, often destroying farmland that underpins the livelihoods of local communities. Bauxite mines can also have a devastating impact on rivers, streams, and groundwater sources that communities rely upon for household consumption and irrigation.</p> <p>[Human Rights Watch, 22/07/2021, "Aluminum: The Car Industry's Blind Spot": hrw.org]</p>
E(3).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response: The Company told Human Rights Watch and Inclusive Development that BMW has promoted responsible sourcing of aluminium and has committed to cut ties with suppliers that would violate the Ghana governments commitment to fight climate change. [Human Rights Watch, 22/07/2021, "Aluminum: The Car Industry's Blind Spot": hrw.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(3).2	The Company has appropriate policies in place	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders • Not Met: Identified cause: Although BMW stated that it uses the Responsible Business Alliance (RBA) risk assessment platform to conduct due diligence in its supplier network and that it has implemented its Drive Sustainability initiative which assessed more than 3,000 supplier locations, the company did not provide concrete information which explains the cause of adverse impact to the stakeholders. <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: Drive Sustainability, a coalition of 11 car companies that includes BMW, Daimler, Ford, Toyota, Volkswagen, and Volvo, in May 2021 initiated a project to assess the human rights risks inherent in aluminium supply chains and those of nine other raw materials, which it said could presage collective action by the auto industry to drive up standards in supply chains. [Supply chain transparency and due diligence, 2021: bmwgroup.com] • Not Met: Stakeholder input to steps taken
E(3).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link: According to BMW, independent third party auditors verify whether policies of the company are met by suppliers. However, information on these audits has not been made publicly available. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Area: Forced labour • Headline: BMW among companies accused of using suppliers linked to forced labour in China • Story: On March 1, 2020, the Australian Strategic Policy Institute (ASPI) released a report that named BMW Motor among 83 other companies benefiting from the use of potentially abuse labour transfer programs. According to the report, more than 80,000 Uighur residents and former detainees from the north-western region of Xinjiang, China have been transferred to factories to work under conditions that strongly suggest forced labour for suppliers of several multinational's supply chains. ASPIC used open-source public documents, satellite imagery, and media reports and identified 27 factories in nine Chinese provinces that have used transferred labourers. It is also alleged that Muslim minorities are thought to be working in forced labour conditions across the country. The ASPI report said that workers live in segregated dormitories, are required to study Mandarin and undergo ideological training. The workers were transferred out of Xinjiang between 2017 and 2019, claiming that people are being effectively "bought" and "sold" by local governments and commercial brokers. [ABC, 01/03/2020, "Apple, Nike and other major companies implicated in Muslim forced labour in China": abc.net.au] [Australian Strategic Policy Institute, 01/03/2020, "Uyghurs for sale": aspi.org.au] [The Guardian, 01/03/2020, "China transferred detained Uighurs to factories used by global brands – report": theguardian.com] [Financial Times, 01/03/2020, "Xinjiang forced labour reported in multinational supply chains": ft.com]
E(4).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response: In its Corporate statements on Uyghurs for Sale Report, the company stated: "With BMW Group's supplier standards, we pose various questions that include compliance with internationally recognised human rights and working conditions, as well as social standards, and our direct suppliers are required to implement our policies and to cascade this further down their supply chain to their sub-supplier management". <p>In response to the letter sent on March 12, 2021 by the Working Group on Business and Human Rights (AL OTH 63/2021) on the allegation of forced Uyghur Labour in the BMW's supply chain, the company stated: "Regarding your specific reference to possible human rights abuses in our supply chain: The BMW Group has no knowledge of minorities being suppressed in its supply chains in China or Human Rights not being observed as agreed with all suppliers in our BMW Group Supplier Sustainability Group. If the UN Human Rights Office of the High Commissioner has information regarding suppression of minorities in our supply</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>chains, we request that this information be shared with us so we can launch an investigation immediately".</p> <p>After the publication of the Conservative Party Human Rights Commission's report on the Uyghur Muslims forced labour in China, a BMW spokesman said: 'Sadly, the CPHRC did not contact us before writing their report and so we are not clear about the allegation they are referring to. 'However, as a matter of principle the BMW Group contractually obliges all 1st-tier (direct) suppliers to comply with human rights, labour and social standards. 'These suppliers must demand these same requirements from their sub-suppliers.'</p> <p>[Daily Mail, 13/01/2021, "Apple, BMW, Nike and Huawei named among global brands accused by the Tories of using Uyghur forced labour in China": dailymail.co.uk] [ABC, 09/03/2020, "Corporate statements on Uyghurs for Sale Report": abc.net.au] [BMW response to joint communication by UN Special Rapporteurs dated 12/03/21 (AL OTH 63/2021), 06/05/2021: spcommreports.ohchr.org] [U.S. Government Publishing Office, 11/03/2020, "GLOBAL SUPPLY CHAINS, FORCED LABOR, AND THE XINJIANG UYGHUR AUTONOMOUS REGION - ROUNDTABLE BEFORE THE CONGRESSIONAL-EXECUTIVE COMMISSION ON CHINA ONE HUNDRED SIXTEENTH CONGRESS Q45": govinfo.gov]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The company's responses provide general information and do not address the allegations of potentially benefitting from the forced labour of Uyghur workers.
E(4).2	The Company has appropriate policies in place	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(4).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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