

Volvo Group

SUSTAINABLE MATERIALS SOURCING DUE DILIGENCE POLICY

1. Purpose

The Volvo Group is committed to ethically and responsibly sourcing raw materials, including minerals, agricultural products, and forestry-based commodities. This policy ensures that Volvo Group's sourcing practices align with internationally recognized human rights and labor standards, comply with applicable legal requirements, and promote environmentally sustainable practices. Through the implementation of this policy, Volvo Group aims to effectively manage supply chain risks, enhance transparency and accountability, and uphold the company's values and stakeholder expectations, thereby fostering a responsible and sustainable supply chain network.

Michael Lovati
Chief Purchasing Officer, Volvo Group
Adopted September 29, 2026



2. Scope and Field of Application

This policy applies to all sourcing and procurement activities involving products containing raw materials within the scope of the Sustainable Materials Program across the Volvo Group. This includes, but is not limited to, all Volvo Group entities such as Volvo Trucks, Renault Trucks, Mack Trucks, Volvo Buses, Nova Buses, Volvo Construction Equipment, Volvo Penta, Volvo Group Trucks Purchasing and Volvo Energy.

All supply partners are mandated to adhere to the supply chain due diligence requirements as outlined in the Supply Partner Code of Conduct and detailed on the Volvo Group Supplier Portal. These requirements encompass adherence to applicable legal requirements, ethical sourcing practices, and the implementation of effective risk management systems to ensure responsible and sustainable supply chains.

This policy remains in effect until it is superseded by a new version approved by the Volvo Group Responsible Purchasing Board.

3. Materials of Concern

Volvo Group's Sustainable Materials Program (SMP) encompasses a comprehensive range of raw materials integral to our products and operations. The identification and prioritization of these materials are guided by the Volvo Group's Top Critical Material List, which is embedded within the Volvo Group Red List (STD 100-0005). This list includes over 20 raw materials identified as high-risk due to environmental, social, or supply chain concerns.

The SMP serves as the framework through which Volvo Group manages due diligence for the following materials, ensuring responsible sourcing practices are upheld. These materials include, but are not limited to:

- **Conflict Minerals:** Tin, Tantalum, Tungsten, and Gold (3TG)
- **Battery Raw Materials:** Cobalt, Natural Graphite, Lithium, Nickel, and their chemical compounds, which are subject to enhanced due diligence given associated human rights, environmental, and supply chain risks
- **Agricultural and Forestry-Based Commodities:** Materials such as cattle, cocoa, coffee, oil palm, rubber, soy, and wood
- **Other Critical Materials:** Mica

4. Supplier Sustainability and Due Diligence Requirements

Volvo Group is committed to minimizing the environmental and social impacts associated with the sourcing of raw materials. Compliance with these due diligence requirements is a condition of doing business with Volvo Group.

Supply partners shall establish, implement, and maintain effective due diligence systems covering the sourcing, processing, and use of raw materials. These systems shall be aligned with internationally recognized frameworks, including the OECD Due Diligence Guidance for Responsible Supply Chains and the UN Guiding Principles on Business and Human Rights (UNGPs), and shall identify, assess, prevent, and mitigate environmental, social, governance, and human rights risks throughout the supply chain.

Where risks are identified, supply partners shall implement appropriate corrective actions and maintain sufficient transparency and documentation to demonstrate compliance with these requirements.

Supply partners shall identify and assess risks related to the security and continuity of supply of raw materials and implement appropriate mitigation measures where necessary.

Failure to meet these requirements, including failure to provide required information or to implement adequate due diligence or mitigation measures, may result in corrective action requirements, suspension of sourcing, or termination of the business relationship.

To support these due diligence requirements, supply partners shall, as applicable:

- Establish and maintain traceability systems capable of identifying the origin of raw materials and mapping supply chains to upstream actors, including, where relevant, production or extraction sites, and provide verifiable origin information, including geolocation where applicable.
- Conduct ongoing risk-based due diligence to identify, assess, mitigate, and monitor environmental, social, governance, and supply chain risks.
- Identify and assess supply chain vulnerabilities and implement appropriate measures to mitigate supply disruption risks.
- Maintain transparency of upstream supply chains and participate in recognized third-party audit or verification programs where applicable.
- Establish governance and accountability structures, including senior management oversight, to ensure effective implementation of due diligence systems.
- Respect internationally recognized human rights, engage affected stakeholders where appropriate, and apply the principle of Free, Prior, and Informed Consent (FPIC) where applicable.
- Maintain documentation and provide information upon request to demonstrate compliance with Volvo Group requirements.
- Promote responsible environmental practices, including protection of biodiversity and natural resources, resource efficiency, circularity, and avoidance of sourcing practices that result in significant environmental or social harm.

These due diligence requirements form an integral part of the Volvo Group Supply Partner Code of Conduct and are reviewed periodically to ensure continued alignment with applicable legal requirements and internationally recognized due diligence frameworks.

