

FORD OTOMOTIV SANAYI A.Ş. DISCIPLINARY POLICY

1. PURPOSE AND SCOPE

The purpose of this Disciplinary Policy (“**Policy**”) is to set standards, principles and rules used to describe and evaluate what is considered as a disciplinary offense and how it is penalized for Ford Otomotiv Sanayi A.Ş. and its Subsidiaries¹ (“**Ford Otosan**”), and to ensure that employees are treated in a fair, appropriate and consistent manner in all of these processes.

This Policy is envisioned to encourage the employees to achieve and maintain satisfactory performance, attendance, behavior and continuity to create the best working environment. All employees and directors of Ford Otosan shall comply with this Policy, which is an integral part of the Ford Otosan Code of Conduct and Ethical Rules.

2. DEFINITIONS

“**Disciplinary Committee**” refers to the committee that is accountable for determining the breach of an employee(s), and affiliated damages that incurred according to the evidence, and for deciding on the appropriate actions.

“**Disciplinary Offence**” is a behavior that may damage the reputation of Ford Otosan, disrupt peace at the workplace, and which is a violation of applicable legislation and/or a breach of Ford Otosan Code of Conduct and Ethical Rules, related policies, procedures, regulations and all applicable regulations and breach of the relevant employment contract.

“**Disciplinary Penalty**” refers to the type of penalty imposed for a Disciplinary Offence as defined herein.

“**Employee**” refers to all employees subject to Koç Holding Work Life Procedure.

“**HR**” refers to Human Resources and Transformation Leadership.

“**Investigation**” means research activities carried out comprehensively and carefully about relevant actions and behaviors to establish the facts of an incident, including the assertion of a Disciplinary Offence claim.

“**Affiliated Leader**” refers to the primary leader of the employee.

“**Main Shareholders**” means the main shareholders of Ford Otosan which are Ford Motor Company and Koç Holding A.Ş.

“**Personnel Regulation**” It is an inseparable part of the employment contract with its annexes, regulating the rights and responsibilities of the monthly paid employees who work with a labor contract at Ford Otosan and are not covered by collective bargaining agreements, regarding the working conditions and working environment.

The words, terms and expressions which used in this Policy but which are not defined shall have the meanings assigned to them in updated applicable laws and from Ford Otosan’ relevant procedures.

3. GENERAL PRINCIPLES

¹ Companies in which Ford Otosan has directly or indirectly: a) majority of its capital or majority of its voting shares, b) the right to elect a number of members constituting the majority that can take decisions in the management body, shall considered as Subsidiaries within the meaning of this Policy. Ford Otosan recommends other companies that fall outside of this definition, but of which Ford Otosan is a shareholder, to adopt this Policy and its principles.

Creating and maintaining a positive working environment for employees is the main principle of Ford Otosan. Therefore, Ford Otosan undertakes to treat all of its employees in an honest, fair, respectful of human dignity, non-discrimination manner, and applies the following principles:

- No employee can be subjected to a Disciplinary Penalty based solely on his/her gender, language, religion, color, age, nationality, thought and wealth difference.
- Disciplinary Penalties can be imposed on employees only if they are proportional to the committed Disciplinary Offense.
- No employee can be subjected to a Disciplinary Penalty more than once for the same Disciplinary Offense.
- The contracts which are made with subcontractors that provide various services to Ford Otosan (e.g. cleaning, security, etc.) are expected to comply with the principles set forth herein as much as they are applicable.
- Investigations conducted to determine whether a Disciplinary Offence was committed, are confidential and performed in accordance with the local and international regulations and in line with Ethics and Whistleblowing Policy²

4. APPLICATION OF THE POLICY

The Disciplinary Committee takes into account the relevant legislation, this Policy, other related Ford Otosan policies, the Ford Otosan Personnel Regulation in case the Employee is paid monthly and the Monthly Paid Personnel Disciplinary Procedure. In case the employee is "with hourly wage", it takes into account the Collective Bargaining Agreement and the Hourly Wage Personnel Disciplinary Committee Procedure. If deemed necessary, the Disciplinary Committee may order a Disciplinary Penalty proportionate to the action after the Investigation has been made. Said Disciplinary Penalty is conducted by HR.

4.1. Investigations

Ford Otosan shall evaluate contradiction with or violation of laws and/or Code of Conduct and Ethical Rules or company policies, which are reported through the Ethics Hotline or other alternative channels carefully, and ensure that the suspected violation is investigated, and aims to investigate the suspected violation or breach, where necessary.

Investigations required for the Disciplinary Committee are carried out in accordance with the Ethical Review and Reporting Procedure. These Investigations are conducted by HR, Internal Audit Leadership and Legal and Compliance Leadership, depending on the nature of the situation. Investigation procedures are determined by the Ethics Evaluation Committee.

Necessary precautions shall be taken against a conflict of interest between parties that are subjected to the notification and the employees who are authorized to perform the Investigation. In case the subject of the investigation is the employer's representatives and assistants who manage the company, who are not members of the Board of Directors and who are group C signature authorities in accordance with the current Board of Directors Internal Directive and Internal Audit Leader, investigation procedure shall be decided by Ford Otosan Leaders who are the executive members of the Board of Directors. In case the subject of investigation is about Ford Otosan Leaders who are executive Board Members, the process is decided by the

² Please refer to Ford Otosan Ethics and Whistleblowing Policy for details

Board of Directors. The Member of the Board of Directors, about whom a disciplinary evaluation will be made, does not attend the Board of Directors meeting where this issue will be discussed.

Ford Otosan reserves all rights arising from the Labor Law regarding the situations in which it gives the employer the opportunity to terminate the employment contract without obtaining a written defense, and the right to file a criminal complaint with the official authorities in case the employee's behavior is a crime or misdemeanor according to the legislation. In such cases, Ford Otosan reserves the right to terminate the employment contract without executing the Investigation and Disciplinary Committee processes. In such cases, the Ethics Evaluation Committee will be informed by the Human Resources Leadership.

4.2.Disciplinary Committee Decisions

Ford Otosan's Monthly Wage Personnel Disciplinary Procedure and Hourly Wage Personnel Disciplinary Procedure explain the types of Disciplinary Penalties and define the situations that require their application.

The HR is responsible for executing the Disciplinary Penalty recommended by the Disciplinary Committee considering this Policy.

A Disciplinary Committee decision must be taken for any Disciplinary Action to be applied. While evaluating the Disciplinary Penalty to be given to the Employee by the Disciplinary Committee, the nature of the violation, the severity of the violation, the degree of fault of the Employee, the resulting damage or the risk, as well as the Employee's seniority at Ford Otosan for each case, his duty, place of duty, performance, Issues such as whether he has received a disciplinary penalty before will also be taken into account objectively.

It is essential that the Disciplinary Committee meetings are held in the absence of the Employee who is the subject of the case.

4.3.Disciplinary Committee

The main task of the Disciplinary Committee is to uphold the equality principle and to conduct objective assessments on the situations that may result in Disciplinary Penalty. Member formation, meeting and decision procedures of the Disciplinary Committees are regulated in the Monthly Paid Personnel Disciplinary Procedure and the Hourly Paid Personnel Disciplinary Procedure.

Ford Otosan Risk Management Committee is periodically reported on the disciplinary committee decisions taken during the year. Upon request, Ford Otosan Main Shareholders are also informed accordingly.

4.4.Right of Defense

Before an employee is referred to the disciplinary committee, it is essential to inform him about the allegations against him and to take his defense.

An Employee for whom a Disciplinary Penalty has been imposed by the Decision of the Disciplinary Committee, in the event that new evidence emerges in favor of him after the date

of the said decision and/or there is a development that destroys the validity of the existing evidence, he/she will report this situation to Ford Otosan through Ford Otosan Ethics Notification Channels together with the evidence and request a re-evaluation of the decision within three (3) months.

In this case, the Ethics Evaluation Committee may request the Disciplinary Committee to review the contested Disciplinary Committee Decision, if the submitted information and documents are found to be reasonable and consistent by examining the new information, documents and evidence submitted.

5. AUTHORITY AND RESPONSIBILITIES

All employees and directors of Ford Otosan are responsible for complying with this Policy. If there is a discrepancy between the local regulations, applicable in the countries where Ford Otosan operates, and this Policy, subject to such practice not being a violation of the relevant local laws and regulations, the stricter of the two, supersedes.

In case of becoming aware of any action that is inconsistent with this Policy, the applicable law or Ford Otosan Code of Conduct and Ethical Rules, Ford Otosan Human Resources and Transformation Leader, Human Resources Leaders at company locations, Ethics Coordinator, Legal and Compliance Leader, Internal Audit Leader or Compliance Leader should be contacted.

You can send all your questions or notices regarding ethical violation by calling “0850 305 50 10”, e-mailing to fordotosan.ethicspoint.com or fordotosanmobile.ethicspoint.com or via <https://www.fordotosan.com.tr/en/corporate/about-ford-otosan/notification-form>. You may also report to Koç Holding’s Ethics Hotline via the following link: “koc.com.tr/hotline” or e-mail to Ford Motor Company’s Ethics Hotline SpeakUp@ford.com.

Ford Otosan employees may consult the Human Resources and Transformation Leadership in Ford Otosan for their questions related to this Policy and its application.

6. REVISION HISTORY

This Policy came into effect with the Board Resolution dated 22.05.2023 and number 2023/16 and is maintained by Legal and Compliance Leadership.

Revision No.	Revision Date	Description