

## FORD OTOSAN DONATION AND SPONSORSHIP POLICY

### 1. PURPOSE AND SCOPE

The purpose of this Donation and Sponsorship Policy (the “**Policy**”) is to set standards, principles and rules to be complied with, while making donations and providing sponsorships. In line with our strong belief that contributing to the community is the vital foundation for building successful business, Ford Otomotiv Sanayi A.Ş. and its affiliates (together called as “**Ford Otosan**”) sees donations and sponsorships as a way to support the communities in jurisdictions where it operates. This Policy has been prepared by considering the ethical principles of Ford Otosan's shareholders, Ford Motor Company and Koç Holding A.Ş.

All employees, directors, officers of Ford Otosan shall comply with this Policy, which is an integral part of Ford Otosan Code of Ethics<sup>1</sup>. Ford Otosan also expects and takes necessary steps to ensure that all of its Business Partners - to the extent applicable - complies with and/or acts in line with it.

### 2. DEFINITIONS

“**Business Partners**” include suppliers, distributors, dealers, authorized services and the other third parties within a business relationship and representatives, independent contractors, consultants, etc., who is act on behalf and account of the company.

“**Donation**” means voluntary contributions in money or in kind (including goods or services etc.) to individuals or charitable entities (such as foundations, associations and other nonprofit organizations); universities and other schools; and other private or public legal entities or organizations etc. to advocate a philanthropic cause, serve the public interest and help achieve a social goal, without a consideration received in return.

“**Sponsorship**” means contribution in money or in kind (including goods, or services, etc.) given to an entity or group, for staging an artistic, social, sports or cultural activity etc. in return for an institutional benefit reflected in the form of visibility to target audiences, under a sponsorship agreement or whatsoever name, to the extent the nature of the relationship is as defined herein.

### 3. GENERAL PRINCIPLES

While making Donations and providing Sponsorships, Ford Otosan ensures that:

- it complies with its incorporation documents (including but not limited to its articles of association), and the restrictions and limits set forth by its General Assembly and/or the Board of Directors or similar body;
- it complies with all applicable legislation in the jurisdictions where it operates; including but not limited to relevant capital markets legislation, commercial code, and tax laws to the extent applicable;

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<sup>1</sup> Ford Otosan Code of Conduct and Ethical Rules, Anti Corruption Policy and the other relevant policies. For details please see <https://www.fordotosan.com.tr/en/corporate/about-ford-otosan/policies>.

- the Donation and/or the Sponsorship is
  - o not in conflict with the values or business interests of Ford Otosan and is in conformity with the principles described herein and in the Ford Otosan Code of Ethics;
  - o properly documented and never in exchange for obtaining an improper advantage or benefit or used for the purpose of any form of corruption;
  - o in line with the above purpose, not offered in connection with any bid, contract renewal or business opportunity;
  - o not made for political purposes to any politician, political party or political groups, a municipality or government official, either directly or indirectly via third party<sup>2</sup>;
  - o not for the benefit to any entity or organization, which discriminates, based on ethnicity, nationality, gender, religion, race, sexual orientation, age or disability or
  - o not directly or indirectly used for human or animal rights' violations, promotion of tobacco, alcohol and illegal drugs and damaging the environment.

Ford Otosan in Turkey shall also ensure that the upper limit for donations is determined by the General Assembly and the Donations granted during the year shall be submitted to the General Assembly.

#### 4. APPLICATION OF THE POLICY

Prior to execution of an agreement or an undertaking on behalf of Ford Otosan, with any new third party, for a Donation or a Sponsorship, notwithstanding the signature circular and articles of association of the relevant company:

- If initiated by a department other than the department responsible for brand communication and sponsorships, a written proposal containing a description of the planned use for the funds and information regarding the relevant entity (name, address, senior management) shall be submitted to Ford Otosan Corporate Communications Department for a corporate image and brand impact assessment. If the outcome of their evaluation is positive, then:
- The Corporate Communications Department shall conduct an enhanced due diligence<sup>3</sup> and makes the necessary information to Ford Otosan Legal Department within the scope of the related company procedures;
- Subject to the outcome of the due diligence being positive, the relevant Donation or Sponsorship shall be submitted for final approval of the management or the board in line with the signature circular of Ford Otosan;
- Additional to the above mentioned processes, any Donation or Sponsorship that may have a material impact over Ford Otosan and/or its shareholders' brand and corporate image, shall also be notified to the related shareholder Corporate Brand Communications and Sponsorship Department by Ford Otosan prior to board approval or execution;

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<sup>2</sup> Please see Ford Otosan Code of Conducts and Ethics Rules and the Anti-Corruption Policy.

<sup>3</sup> Due diligence shall be conducted Ford Otosan Sanctions and Export Control Policy, Anti-Corruption Policy and the other related policies. To the extent required, relevant documentation shall be shared with other departments (including legal, tax and capital markets compliance review).

- For sponsorships, the parties shall enter into a written agreement detailing all the conditions;
- For sponsorships, sponsored entity, must provide the Corporate Communications Department post-event documentation (i.e. photos, videos or a report etc. as may be relevant) or any other documents or materials evidencing compliance with the sponsorship agreement as soon as practically possible after the completion of the sponsored event or project. If, however, the sponsored event is a recurrent event, the sponsorship agreement shall set forth the content and the frequency of reporting.)
- Supporting documents such as receipts and invoices must be kept by the accounting department and transactions must be booked in accordance with the relevant legislation;
- Due Diligence, approval, execution and follow-up processes shall be documented to be used for audit and compliance review where necessary; and
- A report listing Donation and Sponsorship activities (including purpose, entity and due diligence results) shall be kept by Corporate Communications Department and a copy shared with Ford Otosan Legal Department on an annual basis. Ford Otosan Legal Department shares the list with its main shareholders when necessary.

## 5. AUTHORITY AND RESPONSIBILITIES

All employees and directors of Ford Otosan are responsible for complying with this Policy, implementing and supporting Ford Otosan's procedures and controls in accordance with the requirements in this Policy. Ford Otosan also expects and takes necessary steps to ensure that all its Business Partners to the extent applicable complies with and/or acts in line 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, supersede.

If you become aware of any action you believe to be inconsistent with this Policy, the applicable law or Ford Otosan Code of Conduct and Ethical Rules or Ford Otosan main shareholders' ethical rules, you should contact to Human Resources Director, Ford Otosan Ethics Representatives, Chief Legal Counsel or Internal Audit Manager.

You may also report your questions or concerns to the Ethics Hotline by calling 0850 305 50 10 or sending an e-mail [fordotosan.ethicspoint.com](mailto:fordotosan.ethicspoint.com) or [fordotosanmobile.ethicspoint.com](mailto:fordotosanmobile.ethicspoint.com) or via <https://www.fordotosan.com.tr/en/corporate/about-ford-otosan/ethics> website or Koç Holding's Ethics Hotline via the following link: "[koc.com.tr/hotline](https://www.koc.com.tr/hotline)".

Ford Otosan employees may consult Ford Otosan Corporate Communications Department for their questions related to this Policy and its application. Violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by third parties, required all legal actions may be taken including termination of their contracts.