

FORD OTOMOTIV SANAYI A.Ş.

CONFLICT MINERALS POLICY

Ford Otosan recognizes the importance of a sustainable and transparent supply chain and adopts the following, related to the procurement of conflict minerals from conflict-affected and high-risk areas (CAHRA).

Conflict minerals like Tin, Tungsten, Tantalum, Gold (“3TG”) and derivatives of the same can be used at electronic parts, fuel cells, sensor, manufacture of parts such as electric seal module, batteries, audio systems, electric mirrors. In this context, mineral trade at politically unstable territories must not be used to finance armed groups, forced labor, and encourage other human rights violations and to support money laundering with bribery. Ford Otosan supports procurement of such minerals from territories without conflicts.

Ford Otosan expects from our Business Partners (supplier, distributor, dealer, authorized service and any other third parties with whom we have business relationship as well as any agents, sub-contractors, consultants, etc. who act for and on behalf of the Company) to follow the same matters for the purpose of avoiding any action that contributes to financing conflicts, and within this scope act in compliance with the “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas” standards.

Within this scope, Ford Otosan expects from Business Partners to fulfill following principles as a part of our effort to manage risks concerning conflict minerals;

- Making assessment of supply chain in order to identify products where probability of 3TG usage is high and determination and evaluation of supply sources,
- Making necessary collaboration with their own suppliers in order to verify 3TG usage and potential sources of such minerals,
- Performing works for adopting policy related to conflict minerals in a consistent manner with Ford Otosan policies and
- When a circumstance related to conflict minerals at supply chain is determined or a risk is envisaged, applying to reporting channels detailed below and working in coordination with Ford Otosan for elimination of risk and if necessary, ceasing collaboration with risky suppliers.

Ford Otosan, in the event of determining that efforts of any Business Partner to comply with this policy are inadequate and such Business Partner fails to cooperate in terms of improvement and implementation of reasonable corrective steps, reserves the right to take proper measures that may extend to termination of business relationship with the Business Partner.

AUTHORITIES AND RESPONSIBILITIES

All employees and directors of Ford Otosan are responsible for complying with this Policy, implementing, and supporting Ford Otosan’s relevant 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, 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 Leader, Ford Otosan Ethic Representatives (Human Resources Leaders at company locations and Ethics Coordinator employed at the Internal Audit Leadership), Legal and Compliance Leader, Internal Audit Leader or Compliance Leader should be contacted.

You can send all your questions or notices regarding ethical violation, you may call “0850 305 50 10”, e-mail to etik@ford.com.tr 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 Purchasing Product Leaders in Ford Otosan 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 any third parties, all necessary legal actions shall be taken including termination of their contracts and collection of losses incurred by Ford Otosan from responsible parties.