FORD OTOSAN SUPPLIER CODE OF CONDUCT

1. The Purpose of Ford Otosan Supplier Code

This Ford Otosan Supplier Code of Conduct ("Code") outlines Ford Otomotiv Sanayi A.Ş.'s ("Ford Otosan") requirements and expectations for supplier relationships in areas related to human rights, the environment and responsible materials sourcing. This Code applies to each member of Ford Otosan's supplier community.

While we explicitly require suppliers to follow all applicable Ford Otosan policies¹ and to comply with or exceed all applicable current and impending laws and regulations, our Code also aligns with widely accepted international human rights frameworks and charters. In addition, Ford Otosan expects suppliers to uphold fundamental ethical principles, including integrity, transparency, fairness, and accountability. Suppliers are obliged to extend these requirements to their own suppliers and supply chains.

Our goal is to develop a stronger, ethical, and sustainable supply base. While we reserve the right to terminate the business relationship and to seek alternate sources of supply if a supplier fails to comply with this Code, we can also elect to continue to work within a business relationship if we have the leverage to impact their compliance with our environmental, social and governance requirements. This practice allows Ford Otosan to use our purchasing power to develop and monitor progress toward corrective action and create better outcomes for people and groups who may be impacted by a supplier's actions.

2. Supplier Obligations

Every Ford Otosan Supplier Must:

- Know and follow this Code and all applicable laws, aligning company policies to reflect these requirements.
- Enforce a corresponding code of practice and require that subcontractors and suppliers do
- Conduct thorough due diligence before entering into any new business relationship, including adverse media checks, Politically Exposed Person (PEP)² screening, and regular sanctions screening. Where higher risks are identified, suppliers are expected to perform enhanced due diligence.
- Identify and use subcontractors and suppliers who adhere to legal and regulatory requirements, including this Code, and monitor their compliance.
- Report and remediate any non-compliance; and, when issues are identified, transparently report their remediation progress.
- Transparently share sub-tier supply chain information upon request,
- Operationalize and document compliance through the establishment of an appropriate risk management system, including a risk analysis process.

² "Politically Exposed Person (PEP)" refers to individuals who currently hold or have previously held a prominent public function, including senior politicians; senior officials in administrative and judicial bodies and/or the armed forces; senior executives of state-owned enterprises; persons holding significant positions within political parties; executives working in international organizations and institutions; as well as persons serving in positions equivalent to those listed in this definition. This term also covers their relatives up to the second degree by blood or marriage, individuals living in the same household, companies in which such persons hold more than 50% ownership or management control, companies in which more than 50% ownership or management control is collectively held by multiple politically exposed persons, and persons or entities publicly known to be closely associated with politically exposed persons.



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¹ https://www.fordotosan.com.tr/en/corporate/about-ford-otosan/compliance-policies

• Demonstrate appropriate internal controls upon Ford Otosan's request or partake in such upon Ford Otosan 's request.

3. Fundamental Principles of the Code of Conduct

3.1. Protect and Respect Human Rights

Ford Otosan is committed to respecting human rights in everything we do. It's a core part of our purpose to help build a better world where all are free to move and pursue their dreams.

We treat our workforce fairly, humanely, and with respect and dignity — and we expect our suppliers to do the same.

> Our Suppliers Do not use child labor in any form

We Require Our Suppliers To:

- Meet the minimum working age in any region where they operate while prohibiting employment of anyone below the age of 15, even if permitted under local law. Government-authorized job training or apprenticeship programs that clearly benefit the participants are the only exceptions to this requirement.
- Responsibly manage student workers by performing rigorous due diligence on educational partners, keeping appropriate student work records, and protecting student workers' rights.
- Prohibit workers under the age of 18 from performing work that could jeopardize their health or safety, including night shifts, overtime, or hazardous work in compliance with ILO Worst Forms of Child Labour Convention³ (No. 182).
- Implement an appropriate mechanism to verify that the age of workers complies with the ILO Minimum Age Convention (No. 138)⁴ and provide substantiation of this verification mechanism upon request.
- Ensure that all recruitment efforts for workers, including recruitment performed by third party contractors, includes mechanisms or verify that the age of potential applicants complies with the ILO Minimum Age Convention (No. 138).
- Cease employment of the child/children and take reasonable measures to enroll the child/children in a remediation/education program if child labor is discovered in its own facilities or in their supply chain.
- Our Suppliers do not use nor condone forced labor, compulsory labor, or slavery in any form and do not employ any form of abusive disciplinary practices. In Addition, We Strictly Prohibit Our Suppliers from Both Using and Supporting Human Trafficking.

- Confirm that work is conducted on a voluntary basis. Employees should be free to terminate employment without penalty by giving reasonable notice per their contract, if any, and in accordance with applicable laws.
- Prohibit the use of bonded, indentured or exploitive prison labor.
- · Not engage in activities intended to restrict worker freedom of movement.
- · Not allow physically or psychologically cruel, inhuman or degrading treatment.

⁴ <u>Click here</u> for ILO Convention No. 138 on the Minimum Age for Admission to Employment.





³ Click here for ILO Convention No. 182 on the Prohibition and Elimination of the Worst Forms of Child Labour.

> Our Suppliers follow ethical recruiting practices.

We Prohibit Our Suppliers From:

- · Misleading or defrauding potential workers about the nature of the work.
- Asking employees to pay recruitment fees or pay off a loan by working for an agreed-upon or unclear period of time for little or no salary, with the work performed greatly exceeding the worth of the initial loan, including employers' agent and subagents. In case any such fees are found to have been paid by workers such fees shall be repaid to the worker.
- Confiscating, destroying, concealing, and/or denying access to employee passports and other government-issued identity documents.

> Our Suppliers recognize and respect employees' rights to freedom of association and collective bargaining.

We Require Our Suppliers To:

- Work with recognized employee representatives to promote the interests of employees and establish regular dialogue.
- Not discriminate or retaliate against any employees, including those exercising their right to form or join a trade union, or to refrain from such activities.
- Provide opportunities for employees and external stakeholders concerns to be heard, even where there is no representation by unions.
- > Our Suppliers comply with applicable laws regulating hours of work including overtime and support a living wage by providing competitive compensation and benefits that meet or exceed legal requirements.

We Require Our Suppliers To:

- Ensure that work schedules and overtime are provided in a manner consistent with all applicable laws, including maximum hour and rest period laws.
- Agree upon overtime in advance and, where applicable, compensate overtime at a rate greater than regular hourly rates or, where permitted by law, agree in advance to time off in lieu of a higher hourly rate.

Our Suppliers do not tolerate harassment or discrimination of any kind.

- Not allow harassment or discrimination based on race, color, age, gender, sexual
 orientation, gender identity or expression, ethnicity or national origin, disability,
 pregnancy, religion, political affiliation, union membership, covered veteran status,
 protected generic information or marital status in hiring and employment practices
 such as wages, promotions, rewards, and access to training.
- Promote DEI and base employment relationships on the principles of equal opportunity.
- Not hire or use private or public security forces for protection of the company's projects without proper supervision and due diligence in adherence with this Code.
- Clearly define and communicate disciplinary policies and procedures in support of the requirements to workers.





> Our Suppliers respect land rights.

We Require Our Suppliers To:

- Respect the rights of Indigenous Peoples in accordance with the United Nations Declaration on the Rights of Indigenous Peoples⁵.
- Not engage in any acts constituting or aiding unlawful eviction or unlawful taking of land, forests, or waters securing the livelihood of human beings.
- Strive to ensure Free, Prior, and Informed Consent of communities is pursued and obtained prior to project or activities that may affect their lands, resources, and rights.

> Our Suppliers provide a healthy and safe working environment.

We Require Our Suppliers To:

- Provide a working environment that meets or exceeds prevailing industry standards and local, regional, and national safety, occupational health and fire safety regulations.
- Perform regular risk assessments and put in place corrective and preventative measures to minimize workplace hazards including, but not limited to mechanical, electrical, chemical, fire, and physical hazards.
- Report any serious workplace accidents, including those resulting in fatalities or significant injuries, to Ford Otosan without delay.
- · Provide regular health and safety training to workers.
- · Provide required rest breaks to prevent excessive physical and mental fatigue.
- · Provide Personal Protective Equipment (PPE) at no cost to workers.
- Implement an effective fire safety management system and emergency plan at every supplier worksite that safeguards employees and others by providing an appropriate number of clearly marked and unobstructed emergency exits and evacuation routes and providing first aid material and medical assistance/ procedures to workers.
- Provide workers with clean toilet facilities, potable water, and sanitary eating facilities.
- Keep worker dormitories clean and safe, with appropriate emergency exits and reasonable entry and exit privileges.
- Encourage workers to openly raise health and safety concerns and provide safeguards against retaliation.

In addition, Ford Otosan expects its suppliers to maintain a health and safety management system to limit worker exposure to hazards and promote continuous improvement of working conditions and occupational health and safety.

3.2. Protect the Environment

Ford Otosan is committed to protecting the environment and respecting human rights, including the right to clean air and water. We support the protection of local communities from environmental and health hazards and providing meaningful involvement in our decision-making processes.

Suppliers play a critical role in helping reduce greenhouse gas and other emissions that contribute to climate change, air and water pollution. We require our suppliers to identify and minimize potential environmental risks and remediate violations when they occur.

⁵ Click here for the United Nations Declaration on the Rights of Indigenous Peoples.



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Suppliers strive for positive impacts by improving environmental performance by setting targets and monitoring environmental performance indicators.

> Our Suppliers comply with or exceed Ford Otosan's environmental requirements and policies, including all relevant national, regional, environmental, and chemical legislation.

We Require Our Suppliers To:

- Maintain an environmental management system certified to ISO 14001 through an accredited third-party registrar.
- > Our Suppliers minimize their impact on climate change aligned with the United Nations Framework Convention on Climate Change (Paris Climate Agreement), striving towards carbon neutrality.

We Require Our Suppliers To:

- Report their Scope 1, 2, and 3 emissions and water usage data to Ford Otosan if requested.
- Establish science based GHG reduction targets, action plans, and transparent reporting mechanisms to support Carbon Neutrality in supply chain by 2035 (Scope 1 & 2), Net Zero by 2050.
- Our Suppliers Reduce, Reuse, Recycle materials in manufacturing.

We Require Our Suppliers To:

- Use recycled and renewable materials where possible in packaging.
- Improve recyclability of Ford Otosan products through material selection and product design as approved by Ford Otosan.
- Eliminate waste.
- Divert waste from landfill to products.
- Work to eliminate single use plastics throughout the manufacturing process.
- Ford Otosan does not use animals for testing, nor do we ask or fund others to do that for us. Our Suppliers do not use animals for testing nor require subcontractors to do so.

We Expect Our Suppliers To:

- Respect the five animal freedoms formalized by the World Organization for Animal Health (OIE)⁶ concerning animal welfare.
- Not raise or kill any animals for the single purpose of being used in an automotive product.

⁶ The right of animals not to be left hungry or thirsty, not to suffer, not to be harmed, not to be subjected to cruelty, and not to be treated in a way that prevents comfort and natural behavior. For more information, refer to the Five Freedoms of Animal Welfare.





Our Suppliers achieve continual environmental improvement in manufacturing operations.

We Require Our Suppliers To:

- Reduce and/or substitute substances of concern and work to phase out substances of very high concern (including toxic compounds and hazardous waste).
- Avoid incidents and emergency situations by taking proactive measures and be prepared for emergencies in order to limit the impact on people and the environment.
- Utilize materials with reduced toxicity in their manufacturing processes.
- · Reduce emissions annually.
- · Increase energy efficiency, renewable energy and use carbon-free electricity.
- Set water reduction targets and reduce freshwater usage in their own operations and along the upstream and downstream value chain, prioritizing but not limited to water stress areas and support access to clean and safe drinking water in local communities.
- Protect ecosystems and mimic ecosystem performance, especially key biodiversity areas, in locations impacted by its operations, and avoid illegal deforestation in accordance with international biodiversity and deforestation regulations.
- · Refrain from causing any harmful soil change.
- Refrain from excessive noise emissions. Set water reduction targets and reduce freshwater usage in their own operations and along the upstream and downstream value chain, prioritizing but not limited to water stress areas.

3.3. Responsibly Source Materials

Ford Otosan aspires to source only raw materials that are responsibly produced. Ford Otosan considers responsibly produced materials to come from material processors and mines that have been audited to a responsible sourcing, independent, third-party audited supplier. Suppliers should refrain from including sub-tier suppliers who have not undergone or are not actively seeking to undergo an acceptable responsible sourcing audit.

Suppliers are required to fully support and cooperate with Ford Otosan's efforts to secure full transparency and traceability of their raw materials supply chain and must engage sub-tier suppliers. Information provided must not misrepresent material supply chains and include all known information as requested.

Our Suppliers Conduct due diligence and increase transparency related to raw materials, including materials sourced from conflict-affected or high-risk areas (CAHRAs).

> Raw Material Due Diligence Serves as an Extension of the Ford Otosan Due Diligence Implementation Requirements.

- Develop a management system, including an appropriate responsible point of contact, to assess, identify and mitigate risks in material supply chains.
- Enable appropriate measures to minimize risks, including risks related to the direct or indirect financing of armed conflict, serious violations of human rights such as child labor, forced labor and slavery, unethical business conduct, or environmental damage.
- Provide information, upon request, to verify the materials in the products supplied to Ford Otosan have been sourced responsibly in accordance with Ford Otosan's Conflict Mineral Policy.





- Secure critical raw minerals from material processors that are certified through a thirdparty responsible sourcing standard such the Responsible Minerals Initiative's (RMI) Responsible Minerals Assurance Process (RMAP)⁷.
- Obtain the Free, Prior, and Informed Consent (FPIC) of Indigenous Communities when securing raw materials prior to projects or activities that may affect their lands, resources, rights and engage directly with the representatives and institutions chosen and recognized by the Indigenous communities themselves to ensure meaningful consultation and participation in decision-making processes.
- Ensure these requirements are communicated to sub-suppliers and/or directly to identified smelters/refiners/processors who are not RMAP certified.
- Disclose all sub-tier and raw material supply chain actors, including locations for material used in products supplied to Ford Otosan. This includes but is not limited to: conflict minerals, (tin, tantalum, tungsten and gold), and any other materials such as cobalt, lithium, and related chemical compounds, nickel, natural graphite, mica, copper, aluminum, steel, rare earth elements, natural rubber, wood and leather. Participate in initiatives to support responsible material sourcing.

Raw Material Suppliers Must Seek Third Party Assurance for Responsible Sourcing That Also Addresses ESG Concerns:

- Mineral processors are required to seek RMI RMAP certification, use best efforts to implement RMI ESG Standard or an agreed upon third-party certified equivalent, and request upstream material suppliers to undergo similar applicable responsible sourcing and ESG standards.
- Mining suppliers are required to seek certification by an independent third-party responsible mining assurance standard, such as the Standard for Responsible Mining from the Initiative for Responsible Mining Assurance (IRMA)⁸ or an agreed upon thirdparty certified equivalent.

3.4. Maintain Responsible Business Practices

We require suppliers to conduct business lawfully, honestly, and responsibly, in line with Ford Otosan's own internal and external commitments.

Our Suppliers Do business free from bribery and corruption.

- Comply with all anti-bribery and anti-corruption laws and do not participate in or endorse any corrupt practices in whatever form, including offering or accepting bribes, excessive gifts or hospitality or facilitation payments. These obligations are outlined in the Ford Otosan Anti Bribery and Corruption Policy.
- Exercise caution with government officials, avoiding actions that could appear improper and/or raise bribery concerns.
- Accurately record business expenditures, perform the necessary audits, never concealing the true nature of an expense.
- Report to Ford Otosan if you learn of or have reason to know of any payment, offer or agreement relating to the product or service you are providing to Ford Otosan, that is contemplated or that has occurred and that could represent a violation of law.

⁸ IRMA https://responsiblemining.net/



⁷ RMI Assessments Introduction

- Report any suspicious transactions to Ford Otosan and be alert for signs of money laundering.
- Fully cooperate with Ford Otosan's due diligence processes upon request by promptly providing complete and accurate information and all requested documentation, as well as promptly responding to any further questions to ensure timely completion of the process.

➤ Maintain effective privacy and cyber security practices.

We Require Our Suppliers To:

- Act in a transparent and ethical manner regarding the use of Personally Identifiable Information (PII), Ford Otosan intellectual property (IP), and private data.
- Use PII in a manner consistent with reasonable expectations and in compliance with applicable laws and regulations.
- Responsibly manage and safeguard their computing environment using appropriate technical and organizational data security controls.
- Report all cyber security incidents affecting their computing environment within 24 hours of knowing about the incident to: alert@ford.com.tr

> Comply with all applicable trade controls regarding products and services provided to Ford Otosan.

We Require Our Suppliers To:

- Not engage in direct or indirect commercial activity with sanctioned countries, territories, entities, persons, or sectors and agree to comply with Ford Otosan's Sanctions and Export Controls Policy⁹.
- Conduct appropriate due diligence to comply with sanctions, export controls, and anti-boycott requirements.

Comply with all applicable customs regulations.

We Require Our Suppliers To:

- Adhere to requirements within Ford Otosan's Supplier Chain Compliance Policy¹⁰ rules for customs processes.
- Maintain accurate and complete records related to customs activities.

4. Implementation of This Code

This Code of Conduct forms an integral part of Ford Otosan's Purchasing Contracts and Specifications. All Ford Otosan suppliers are expected to comply with this Code, actively work to prevent risks, remediate and mitigate issues when identified, and cooperate in all related processes.

Ford Otosan may request verification of compliance with this Code at any stage of the supplier relationship, including prior to awarding business.

¹⁰ https://www.fordotosan.com.tr/documents/Kurumsal Politikalar/antetli supply-chain-compliance-policy(1).pdf





⁹ https://www.fordotosan.com.tr/documents/Kurumsal Politikalar/sanctions-and-export-controls-policy.pdf

Suppliers agree and commit to implement any corrective action plans necessary to ensure or demonstrate compliance with this Code, according to a mutually agreed timeline and at no cost to Ford Otosan.

Our suppliers must:

- Appoint a senior-level executive responsible for the oversight, governance, implementation, and compliance of this Code.
- Establish an appropriate compliance risk management system based on the United Nations Guiding Principles on Business and Human Rights to manage human rights and environmental risks, responsible material sourcing, and lawful business practices.
- Provide regular and up-to-date training to employees on the practices outlined in this Code, at least once annually. If a supplier is unable to independently offer or maintain such training, Ford Otosan may support access to industry-relevant training. For any questions or requests, suppliers may contact esgsc@ford.com.tr.
- Maintain documentation of employee training and provide it to Ford Otosan upon request.
- Participate in Ford Otosan's Self-Assessment Questionnaires and/or support Ford Otosan's evaluation of compliance through onsite assessments or audits conducted by independent third parties.
- Maintain documentation, evidencing efforts to comply with this Code and retain such records for a minimum of seven years.
- Develop and implement due diligence measures on human rights, environmental, and sustainability matters to prevent and mitigate risks and generate positive impact.
- · Identify and assess compliance risks related to human rights and the environment, determine actual or potential adverse impacts—where appropriate with support from external experts—and ensure effective stakeholder engagement in decision-making processes, including sub-suppliers and affected individuals or communities.
- Integrate the findings of due diligence into business plans and decision-making processes, with consideration for environmental protection, human rights, public health, Indigenous Peoples, and local communities.
- Set Environmental, Social, and Governance (ESG)-oriented objectives, monitor and report progress toward those goals.
- · Provide timely and accurate information to stakeholders regarding environmental, social, and governance issues relevant to Ford Otosan.
- Ensure fair treatment in decision-making processes of affected individuals or groups
 — regardless of race, color, national origin, or income in connection with the supplier's or its sub-suppliers' operations.
- Engage transparently and constructively with stakeholders, including local communities, governments, civil society organizations, and Indigenous groups, on matters covered by this Code.
- Where appropriate, seek third-party support to assess internal compliance with this Code in addition to internal evaluations.

> Whistleblowing and Grievance Mechanisms

· Suppliers must provide a grievance mechanism accessible to all employees, subsuppliers, and third parties. Stakeholders must be informed transparently about the





- mechanism, including how to access and use it. Appropriate remedy must be provided to end the violation or mitigate its adverse impacts.
- Retaliation against any person who, in good faith, reports a violation of policy or law is strictly prohibited.
- · If you suspect behavior, conditions, or concerns including product safety issues that may violate Ford Otosan's policies or procedures, report them through Ford Otosan's Ethics Reporting Channels (Ethics Line: +90 850 305 50 10, Ethics Web Portal¹¹, or through the ethics hotlines of our parent companies Koç Holding Ethics Hotline (koc.com.tr/ihbarbildirim) or Ford Motor Company's SpeakUp@ford.com). Ford Otosan will not tolerate retaliation against suppliers for reporting unethical or unlawful conduct by its employees or representatives.
- Suppliers may also inform stakeholders about Ford Motor Company's External Grievances System as a transparent channel for raising concerns related to human rights and environmental issues. This system is open and accessible to all suppliers and workers in Ford's supply chain.

5. References

- Universal Declaration of Human Rights and the two Covenants (1948)
- ILO Conventions, including No. 138 (Minimum Age) and No. 182 (Worst Forms of Child Labour)
- UN Guiding Principles on Business and Human Rights (2011)
- OECD Guidelines for Responsible Business Conduct (2023 Edition)
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (2016 Edition)
- UN Global Compact
- UN Sustainable Development Goals
- UN Women's Empowerment Principles (2010)
- United Nations Declaration on the Rights of Indigenous Peoples (2007)
- Automotive Industry Guiding Principles (2022)
- Relevant Supply Chain Due Diligence Regulations:
 - o German Supply Chain Due Diligence Act (2021)
 - o EU Battery Regulation (EU) 2023/1542
 - o EU Deforestation Regulation (EU) 2023 / 1115
 - o U.S. Uyghur Forced Labor Prevention Act (UFLPA)
 - EU Corporate Sustainability Due Diligence Directive (CS3D)
 - U.S. Dodd-Frank Act (Conflict Minerals)

¹¹ <u>Click here</u> for the Ford Otosan Ethics Web Portal.



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Relevant Environmental Regulations:

- Minamata Convention on Mercury, dated 10 October 2013, and in particular the following provisions:
 - Article 4 (1) Prohibition of the manufacture of mercury-added products listed in Part I of Annex A, as of the phase-out date specified in the Convention for the relevant products and processes.
 - Article 5 (2) Prohibition of the use of mercury and mercury compounds in certain manufacturing processes listed in Part I of Annex B, as of the phase-out date specified in the Convention for the relevant products and processes.
 - Article 11 (3) Appropriate measures for the management and treatment of mercury waste.
- Stockholm Convention on Persistent Organic Pollutants, as of 23 May 2001, as amended by Regulation (EU) 2019/1021 and most recently in 2020, and in particular the following provisions:
 - Article 3 (1) (a) Prohibition of the production and use of chemicals listed in Annex A.
 - Article 6 (1) (d) (i, ii) Prohibition of the treatment, collection, storage, and disposal of waste in a manner not environmentally sound.
- o Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal, as last amended in 2013.
- o <u>Regulation (EC) No 1013/2006</u> on shipments of waste, as last amended in 2020.

• Responsible Material References:

o EU Critical Raw Materials Act2020)

Ford Otosan Public Policies and Resources (Publicly Available):

Remuneration Policy

Intellectual Property Compliance Policy

Diversity, Equity and Inclusion Policy

Protection of Inside Information and Prevention of Insider Trading Policy

Policy on Prevention of Laundering the Proceeds of Crime, Financing of Terrorism and Weapons of Mass Destruction

Prevention of Retaliation Policy

Personal Data Protection and Processing Policy

Gifts and Entertainment Policy

Ethics and Whistleblowing Policy

Competition Law Compliance Policy

Sanctions and Export Controls Policy





Compliance Policy

Anti-Bribery and Corruption Policy

Disciplinary Policy

Donation and Sponsorship Policy

Supply Chain Compliance Policy

Conflict Mineral Policy

Human Rights Policy

Ford Otosan Working Principles and Code of Ethics

Biodiversity Strategy

Board Diversity Policy

Social Investment Policy

Social Investment Focus Areas and Issues to be Addressed

Disclosure Policy

Guide for Combating Domestic Violence and Abuse

Information Security Policy

Water Policy

Environment and Energy Policy

Quality Policy

Occupational Health and Safety Policy

Equality at Work Declaration

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Version	Date	Description
1.0	01.10.2025	First release