

FORD OTOSAN POLICY ON PREVENTION OF LAUNDERING THE PROCEEDS OF CRIME, FINANCING OF TERRORISM AND WEAPONS OF MASS DESTRUCTION

1. PURPOSE AND SCOPE

The purpose of this Policy on Prevention of Laundering the Proceeds of Crime, Financing of Terrorism and Weapons of Mass Destruction (“**the Policy**”) is to establish principles and rules to be implemented within Ford Otomotiv Sanayi A.Ş. and its Subsidiaries¹ (“**Ford Otosan**”) as a reflection of Ford Otomotiv Sanayi A.Ş.'s commitment to prevent money laundering and the financing of terrorism.

All employees, directors and officers of Ford Otosan shall comply with this Policy, which is an integral part of Ford Otosan Code of Conduct and Ethical Rules². Ford Otosan also expects and takes necessary steps to ensure that all its Business Partners - to the extent applicable - comply with and/or act in accordance with this Policy.

2. DEFINITIONS

“**Business Partners**” includes suppliers, distributors, dealers, authorized services and other third parties with whom we have a business relationship and all kinds of representatives, independent contractors, subcontractors, consultants, etc. acting on behalf of Ford Otosan, as well as their employees and representatives of the above.

“**Criminal Proceeds**” refers to the value of assets derived from a crime.

“**Financial Action Task Force (“FATF”)**” is an international organization established in 1989 to develop policies and standards to combat a range of crimes, including the prevention of money laundering, human and drug trafficking, terrorism and the financing the weapons of mass destruction.

“**Financing of terrorism**” refers to activities that provide financial support to terrorist individuals, groups, organizations or supporters.

“**Government/Public Official**” broadly refers to a variety of individuals including but not limited to the following:

- Employees working at government bodies or government business enterprises domestically or in a foreign country,
- Employees of political parties, political candidates, (domestic or in a foreign country),
- Any person who holds a legislative, administrative or judicial position, (domestic or in a foreign country),

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.

² Please see <https://www.fordotosan.com.tr/en/corporate/about-ford-otosan/policies> for Ford Otosan Code of Conduct and Ethical Rules and other related policies.

- Judges, jury members, or other officials who work at domestic, foreign or international courts,
- Officials or representatives working at national or international parliaments;
- Arbitrators resorted to, who have been entrusted with a task within the arbitration procedure, in order to resolve a legal dispute.

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

“**Money Laundering**” is the process of integrating the proceeds of illegal activities into the financial system as if they had been obtained legally, and concealing the fact that these proceeds were derived from illegal activities.

“**Politically Exposed Persons (“PEP”)**”³ are the individuals who are or have been entrusted with prominent public functions domestically or by a foreign country, for example heads of state or heads of government, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations, important political party officials. Definition of “PEP” applies to family members or close associates, any individual publicly known, and relatives by blood and marriage up to the second degree of these individuals, persons living together in the same house and companies in which these persons have more than 50% of the shares or management control by these individuals, or individuals or companies known by the public to be a close personal or professional associate.

“**Ultimate Beneficial Owner (“UBO”)**” refers to the natural person(s) who ultimately controls or has ultimate influence over a legal entity or an unincorporated entity.

“**Weapons of Mass Destruction**” refers to nuclear, chemical and biological weapons and ballistic missile programmes as defined by the United Nations Security Council Resolutions.

3. GENERAL PRINCIPLES

Ford Otosan implements the relevant legislation in all its operations to manage the risks it may be exposed to regarding money laundering, terrorism and the financing of the weapons of mass destruction (“**AML-CFT**”)⁴, benefiting from the studies and guidance provided by leading international organizations in this field.

It is strictly prohibited for any employee of Ford Otosan to be directly or indirectly involved in any activity that facilitates money laundering, the financing of terrorism and Weapons of Mass Destruction, to participate in any transaction that may conceal its illicit nature, or to support, be a party to, or actively participate in any such activity.

In this context, in all transactions that Ford Otosan is a party,

- Necessary measures should be taken to effectively manage the risks associated with AML-CFT,

³ <https://www.fatf-gafi.org/en/publications/Fatfrecommendations/Peps-r12-r22.html>

⁴ AML-CFT: “Anti-Money Laundering / Countering the Financing of Terrorism”

- Due Diligence and, where appropriate, Enhanced Due Diligence⁵ ("EDD") should be conducted on a regular basis in accordance with legal requirements to identify Business Partners and customers,
- If unusual and suspicious activities are detected, the transaction should be investigated in detail, stopped immediately if necessary and the legal authorities should be informed.⁶

4. APPLICATION OF THE POLICY

4.1. Know Your Business Partner ⁷

Prior to establishing an permanent business relationship with a Business Partner, and periodically throughout the established business relationship, or even for one-time transactions of significant size depending on the company's activities and financial structure, the business units are responsible for conducting Due Diligence using a screening tool by taking all necessary commitments in accordance with all the legislation on the protection of personal data in force in the countries where Ford Otosan operates. In order to ensure the effective implementation of this study, the following points shall be considered:⁸

- The tax office and numbers of Business Partners, as well as the valid identity and address information of their authorized representatives and (if applicable) shareholders, are determined. The information obtained must be verified if necessary within the framework of the relevant legislation or if there are doubts as to its reliability and validity. In addition, the identification of the Ultimate Beneficial Owners (UBO) is carried out in accordance with the legislation. Detailed information is obtained about the profession, industry, source of income, duration of operation in that business line, and commercial history.
- Information is obtained on the nature and level of activity of existing and potential business relationships with Ford Otosan.
- Information is obtained on the countries and regions in which the declared business is carried out⁹.
- When establishing and maintaining a business relationship, a screening tool is used to regularly check national/international sanctions lists and negative media reports to determine whether the Business Partner¹⁰ or the UBO has been involved in financial or other serious crimes, as well as any potential risks related to sanctions and export control regulations¹¹.
- Internet, media screening and other databases are used to confirm whether the Business Partner¹² or the UBO is a public official or a PEP.

⁵ For details, please refer to Ford Otosan Supply Chain Compliance Policy and Ford Otosan Sanctions and Export Controls Policy.

⁶ Legal authorities shall be informed by the Legal and Compliance Leadership.

⁷ All identity verification procedures set out in this Policy also apply to customers with whom a permanent business relationship is established.

⁸ The primary responsibility for the listed processes belongs to the Business Units.

⁹ Business units are required to pay particular attention to business relationships and transactions with natural and legal persons, unincorporated entities and citizens of countries at risk, and to gather and record information, to the extent possible, on the purpose and nature of transactions that do not have a reasonable legal and economic purpose.

¹⁰ If the counterparty is a legal entity, necessary checks on shareholders (if any) and legal representatives are also conducted through the screening tool.

¹¹ Please refer to Ford Otosan Sanctions and Export Controls Policy for details..

¹² In case the Business Partner is a legal entity, the necessary checks and screenings for shareholders (if any) and legal representatives are also carried out through the screening tool.

- All information, documents, and records obtained are periodically updated and retained for a minimum of 8 years from the date of the last transaction.

If, as a result of the due diligence, taking into account all information received, a negative finding, a reasonable suspicion or a possible violation of this Policy or the law is identified, the Legal and Compliance Leadership must be informed immediately. The Legal and Compliance Leadership may decide to stop the transaction or conduct Enhanced Due Diligence (“EDD”). In this case, Ford Otosan Leaders is informed about the compliance risks identified and the possible impact of these risks on Ford Otosan and the measures suggested to be taken in case of establishing, terminating or continuing a business relationship. Ford Otosan Leaders shall make the decision to establish, continue or terminate the business relationship taking into account the assessments and recommendations of the relevant EDD report. Decisions taken with the approval of the General Manager may be reported to the Main Shareholders by the Legal and Compliance Leadership and shall be subject to internal audit, if deemed necessary.

At the stage of signing a contract with a Business Partner, Ford Otosan shall ensure that the relevant persons are informed about this Policy. Furthermore, Ford Otosan reserves the right to terminate the contract or to seek legal remedies in the event of a violation of the Policy.

4.2. Suspicious Transactions

If any suspicion arises that the assets involved in the transaction have been obtained illegally or used for illegal purposes, used to finance terrorism or are related or connected to the same, the Legal and Compliance Leadership should be informed immediately via the Suspicious Transaction Forms provided in the Annex-1.

The following transactions and activities may be considered as examples of suspicious transactions:

- Individuals who do not provide complete information, provide incorrect, inconsistent or suspicious information, or are reluctant, hesitant or obstructive with respect to reporting and/or recordkeeping requirements,
- Requesting payments to be made, especially in cash or cash-like forms, or to different bank accounts on behalf of third parties,
- Persons and transactions related to jurisdictions designated as high-risk by the FATF¹³,
- Making payments in currencies other than those specified in the contracts, using cryptocurrencies in transactions, or requesting them,
- Making payments to, or receiving payments from, third parties not named in the relevant contracts, or using exchange offices as intermediaries in transactions,
- Making payments to “shell bank” accounts or to individuals or entities located in countries known as “tax havens”, or transferring funds to/from unrelated foreign countries,
- Payments to or from organizations where it is not possible to identify the ownership structure or determine the UBO,
- Transactions involving persons whose names appear on lists of persons suspected of money laundering as a result of checks carried out using the screening tool,

¹³ As of the effective date of this Policy, North Korea, Iran and Myanmar are included in the FATF's list of high-risk jurisdictions. The current list of high-risk countries is available at <https://www.fatf-gafi.org/en/publications/High-risk-and-other-monitored-jurisdictions.html>. This list may be expanded by the Legal and Compliance Leadership.

- Payments made in small amounts and through several different financial institutions.

It is important for all employees to be vigilant in this regard, to act decisively and in accordance with procedures if a risky transaction is identified, and to consult the Legal and Compliance Leadership if in doubt.

4.3. Training

Under the leadership of the Legal and Compliance Leadership, various training and awareness-raising activities are organized to create a common corporate culture, taking into account the legislation, this Policy and other relevant internal procedures regarding the prevention of laundering the proceeds of crime, financing of terrorism and weapons of mass destruction.

5. AUTHORITY AND RESPONSIBILITIES

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

If there is a discrepancy between the local regulations, applicable in the countries where Ford Otosan operates, and this Policy, the stricter of the two shall prevail, unless such practice is in violation of the relevant local laws and regulations.

In case of becoming aware of any action that is inconsistent with this Policy, employees should contact 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.

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 contact the Legal and Compliance Leadership of Ford Otosan for their questions regarding 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, all necessary legal actions shall be taken including termination of their contracts and collection of losses incurred by Ford Otosan from responsible parties.

6. REVISION HISTORY

This Policy takes effect on 27.06.2024 as of the date approved by the Board of Directors and is maintained by the Legal and Compliance Leadership.

Revision	Date	Description