

FORD OTOMOTIV SANAYI A.Ş. DISCLOSURE POLICY

1. Objective and Scope

Ford Otomotiv Sanayi A.S (“Ford Otosan” or the “Company”) aims to provide all the significant information about the activities of the Company, which are not regarded as trade secret, to all relevant authorized institutions, shareholders and investors in an exact, accurate, clear, transparent, fair, concurrent and timely manner.

Ford Otosan’s financial performance, operational activities, forward looking expectations and the developments that may affect the Company’s share price are made public in compliance with this disclosure policy as well as regulations of the Capital Markets Board of Turkey (CMB), Borsa İstanbul A.Ş. (BIST) and other legislations.

2. Responsibility

The Board of Directors has the authority and is responsible for forming, inspecting and improving the Disclosure Policy. Investor Relations and Corporate Communications departments are assigned to coordinate the disclosure function. The Disclosure Policy approved by the Board of Directors is disclosed to public in Company website and Public Disclosure Platform (PDP). Any changes to the Disclosure Policy will be approved by the Board of Directors and made available in Company website and PDP.

3. Tools for Investor Communication

3.1 Spokespersons

The spokespersons for the company are; members of the Board of Directors, Executive Management of the Company (General Manager, Deputy General Manager and AGMs), Treasury & Risk Manager, Investor Relations Manager, Investor Relations Officer, and Corporate Communications Manager. No other executives, directors, consultants or employees of Ford Otosan are authorized to answer inquiries or to discuss financial or operational activities of the Company, unless they have the approval of the General Manager, Deputy General Manager, CFO or Investor Relations Department. These spokespersons of the Company may, occasionally, designate other employees to speak on behalf of the Company or to answer the specific inquiries from the investors or the media. Employees other than the authorized spokespersons are not allowed to answer the inquiries from the investment community, analysts, media, stakeholders and public, unless specifically designated by the spokespersons. These inquiries should be forwarded to the authorized spokespersons.

3.2 Methods and tools

Investor Relations or Corporate Communications departments are in charge of organizing, programming and improving the communication with and presentations to investors, analysts and media. Only the General Manager, Deputy General Manager, CFO and the Investor Relations Department are authorized to disclose information to investors and analysts.

Any attempt to discuss or present financial and operational information outside the Company must first be reviewed and approved by Investor Relations after which Corporate Communications should be informed. The disclosures made by other departments about their relative fields must be by the related AGM or an employee designated by the AGM within the knowledge of the Investor Relations and Corporate Communications departments and according to the procedure set by this policy. In this manner, the disclosure is made within public information. Legal compliance is ensured for information that will be announced to the public for the first time.

Ford Otosan uses the following methods and tools for informing the public in accordance with its Disclosure Policy within the framework of CMB and BIST Regulations and provisions of the Turkish Commercial Code:

- Material event disclosures announced in Public Disclosure Platform (PDP), Corporate General Information Form and financial reports
- Annual report and quarterly interim reports
- Corporate website (www.fordotosan.com.tr)
- Informatory documents and presentations prepared for the investors
- Verbal statements made in group or one to one meetings with analysts and investors, telephone calls
- Press releases in the printed or visual media
- Media interviews and press conferences
- Advertisements and announcement in the Turkish Trade Registry Gazette and, if needed, in daily newspapers
- Registration statement, circular, announcement texts and other documents prepared in accordance with Capital Market Board regulations

3.3 Informative and Promotive Documents Prepared for the Investors

Investor Relations Department has been established to manage the relations with investors and analysts, respond to investor inquiries in the most efficient manner and carry out activities to reach the fair value.

Investor Relations Department aims to inform investors in the best possible way through investor tools such as presentations, investor bulletins, Q&A documents, company website, annual reports, teleconferences and web-casts, investor meetings, etc. and ensures that all such tools are prepared, published and updated in compliance with the legislation.

Investor Relations officers endeavor to facilitate all meeting requests received during the year, regularly attend conferences organized in Turkey and abroad and hold one-on-one meetings with investors. These meetings are also attended by General Manager, Deputy General Manager and CFO periodically, enhancing the communication between shareholders and potential investors and our Executive Management. In order to ensure effective financial communication, presentations are prepared on a quarterly basis on the financial results and analyst meetings or teleconferences and web-casts are organized with the attendance of the Investor Relations Manager, CFO and from time to time General Manager and/or Deputy General Manager to answer the questions received from investors and analysts.

The company website, which is updated regularly, and the informative documents shared with the stakeholders through the website aim to facilitate easy access to investor relations tools and the close monitoring of the developments in the Turkish economy and Company by the stakeholders and the analysts. Detailed information has been provided below on the annual reports and the website contents.

4. Policies on Material Disclosures

4.1 Responsibility

Once a decision is made that information is material, which means it may affect the investors' investment decision and capital market instrument prices and will not be the subject of a confidential filing, it must be disclosed and broadly disseminated to the public. When the regulations require to do so, Ford Otosan makes announcements to public through the Public Disclosure Platform (PDP) and issues the announcements on its company website (www.fordotosan.com.tr) in Turkish and English. Material non-public information shall not be selectively disclosed to members of the investment community and stakeholders. This is performed in compliance with the regulations for Public Disclosure Platform. The CFO is responsible to fulfill this liability.

4.2 List of Individuals with Administrative Responsibility

The list of individuals with administrative responsibility is composed of members of Ford Otosan A.Ş.'s Board of Directors and individuals who are directly or indirectly in a position to have consistent access to insider information on the Company and who, at the same time, have the authority to make administrative decisions on Company's future development and commercial objectives. Individuals who have regular access to insider information and who, at the same time, are authorized to make administrative decisions are the members of the Board of Directors of the Company, General Manager, Deputy General Manager and Directors reporting to General Manager directly, Assistant General Managers and Koç Holding Executives (Board of Members, Koç Holding CEO, Presidents, Directors, Chief Legal Advisor and the General Secretary). The list is updated by the Company according to the related regulations and Central Registry Agency (CRA) is informed.

4.3 Procedure to Be Followed In the Case of Press News

Tracking Mechanism

Ford Otosan monitors the news flow that appears about the Company in the national press and media through the contracted domestic media monitoring agency. Corporate Communications department reports the relevant coverage to the Company's senior management and Investor Relations department every morning. In addition, the news on the Company in the subscribed broadcast channel is monitored.

Performing the Liability to Validate

In the case of news or rumors about Ford Otosan. that may potentially affect the investment decisions or the price of the capital market instruments, appearing in press or any other forms of media for the first time or including information different from the already publicly disclosed information, an announcement is made as to whether this information is correct or sufficient.

As a general policy, Ford Otosan applies the following principles in performing its liability to validate:

- If the news do not have significance in terms of insider information, in principle no announcement is issued. However, Corporate Communications Department evaluates whether there is value added in making an announcement on such a subject, which does not require the issuance of a material event disclosure as per CMB regulations.
- If a material event disclosure or any other means of disclosure in accordance with CMB regulations has already been made about the news, no further action is taken.
- In principle, Ford Otosan does not comment on news that clearly appear not to be sourced from Ford Otosan, or that clearly appear to be gossip, rumor and unfounded. However, if deemed necessary, Ford Otosan may decide to make a material event disclosure about such unfounded news in order to protect the interest of the shareholders and the company. Apart from the material event disclosure, Corporate Communications Department may issue a press release on such news, if deemed necessary.
- In case of inaccurate news that may be regarded as material information or that may potentially affect the investment decisions or the price of the capital market instruments, a material event disclosure is made.
- If the news contain accurate information on material details about the postponed announcements and is company sourced, the grounds for postponing the announcement is no longer valid and a material event disclosure is made.
- If the news contain inaccurate information about the postponed announcements, then as the confidentiality is still achieved, material event disclosure may not be made. However, if deemed necessary, Ford Otosan may decide to make a material event disclosure about such unfounded news in order to protect the interest of the shareholders and the company.
- The circulation rate and/or publicity of the media are taken into account in evaluating the liability to validate.

4.4 Measures to Protect Insider Information Until Public Announcement

Ford Otosan employees who are in a position to have insider information have been informed that they are liable to protect insider information between the time when the information subject to a material disclosure develops until it is announced in the Public Disclosure Platform, PDP.

As a general principle, Ford Otosan and the persons who work in the name and on account of the Company cannot, by any means, share information that is not publicly available and that may qualify for a material disclosure, with the third parties. If it is determined that insider information has unintentionally been shared by these people with the third parties, and if it is concluded that the confidentiality of the information cannot be protected, within the scope of Capital Market legislation, then a Material Disclosure is issued.

If public disclosure of such information is postponed, persons with access to the subject information at the time of postponement are informed about their obligations and sanctions applicable thereof.

Precautions ensuring confidentiality are targeted in the agreements made with the persons who have the information other than working on account of Ford Otosan.

5. Public Disclosure of Financial Statements

Ford Otosan's financial statements are prepared in accordance with Turkish Accounting/Standards and Financial Reporting Standards within the scope of Capital Market Board regulations. Annual and semi-annual financial statements are independently audited and publicly announced.

Financial statements and footnotes, after being approved by the Audit Committee and Board of Directors, are sent to the Public Disclosure Platform, PDP, with other requested documents before disclosing to public within the framework of Capital Market Board regulations. The financial statements and footnotes, published through the Public Disclosure Platform, PDP, are available on the Company's website latest one working day after the announcement.

In addition to the information disclosed on financial statements, in order to allow investors to make sufficient analysis, additional information such as the Company's financial ratios and FX position can be disclosed on investor presentations prepared for each reporting period.

6. Annual Report

The design and content of the annual report is prepared in accordance with the best international applications, Capital Market Board regulations, Turkish Commercial Code and Capital Market Board Corporate Governance Principles by Investor Relations department and is then subjected to the approval of the Board of Directors. The report with financial statements is disclosed to the public through the Public Disclosure Platform. The annual report which is publicly disclosed on the website in Turkish and English are also provided to shareholders as hard copies, institutions and people as requested. Quarterly interim reports are also disclosed to the public through the Public Disclosure Platform (PDP), and submitted to the investors' information on the company website in Turkish and English.

7. Corporate Website

Corporate Communications Department is responsible for coordinating the preparation of Ford Otosan A.Ş.'s website. The Company aims to use the corporate website (www.fordotosan.com.tr) as a tool that will most efficiently disseminate information. The content of the website is prepared in a way to provide a range of information that all stakeholders will find useful. Information and documents, which are intended for the interest of stakeholders and investors, are gathered under a separate section entitled "Investor

Relations". Annual reports, financial statements and footnotes, quarterly results announcements, quarterly export figures as declared to Automotive Industry Association, monthly market shares, annual capacity utilization rates, industry statistics, investments, new projects, employment information available in investor presentations, material disclosures, general assembly documents are available under this section. Most of the information on the website is available in both Turkish and English. In addition to current information, analyses, evaluations and historic information and statistics are also available in the website.

8. Forward-Looking Statements

Ford Otosan may provide sufficient forward-looking information which are not misleading or overpromising to the investors and analysts, in line with the Company's financial and operating results for facilitating a reasonable base for investment evaluation. Forward-looking statements may include, but are not limited to, Turkish automotive industry sales figures, Ford Otosan domestic, export and wholesales, production quantities, investment spending, revenue, profitability and such financial information.

- Forward looking statements along with their main underlying assumptions shall be disclosed maximum four times within a year, in principle following the disclosure of quarterly financial statements. It is updated at the same time in investor presentations.
- The disclosure shall be disseminated through PDP by annual report or a material event disclosure if deemed necessary. Subject material event disclosure, annual report and presentation shall be accessed on the company website.
- In case the disclosed expectations change materially, in other words the expectations and assumptions expressed in the forward-looking statements disclosed to the public are not realized or turn out to be impossible to be realized, the revised expectations are disseminated to the public through material event disclosures without any limitation in terms of the number of the disclosure.
- In case material discrepancies arise between the expectations disclosed and the realizations, the reasons of those discrepancies are also explained in the forward looking statements.

9. Announcements Pertaining to the Exercise of Shareholder Rights

Within the scope of Capital Markets regulations, shareholders are provided information about the general assembly meetings, capital increases, dividend payments, mergers and spin-offs through the use of prospectus and announcements.

In addition to the legal platforms, the subject documents are published on Ford Otosan's website to facilitate easy access to the investors.