

FORD OTOSAN COMPLIANCE POLICY

1. PURPOSE AND SCOPE

The purpose of this Compliance Policy (“**Policy**”) is to establish a customized, comprehensive and effective compliance framework for Ford Otomotiv Sanayi A.Ş. and its Subsidiaries¹ (“**Ford Otosan**”) and demonstrate Ford Otosan’s commitment to compliance with laws and regulations, internal policies, good corporate governance practices and ethical rules. This Policy has been prepared by considering the ethical principles of Ford Otosan's Main Shareholders.

All employees, directors, officers of Ford Otosan shall comply with this Policy, which is an integral part of Ford Otosan Code of Conduct and Ethical Rules.

2. DEFINITIONS

“**Business Partner**” means suppliers, distributors, authorized services and all other third parties with whom we have a business relationship, and all kinds of representatives, subcontractors, consultants, etc. that act on behalf of Ford Otosan and employees and representatives of the above.,

“**Compliance**” is defined as adhering to the requirements of laws, regulations, industry and organizational standards, internal policies and procedures and generally accepted ethical standards.

“**Legal and Compliance Leader**” is primarily responsible for managing and overseeing the Compliance Program for Ford Otosan.

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

“**Retaliation**” is any negative action, including but not limited to demotion, discipline, firing, salary reduction, or job or shift reassignment, to punish an employee for a protected activity, such as reporting an injury, safety concern, mismanagement, abuse of authority, or legal violation in the workplace.

“**Systematic Risk Analysis**” is a process to identify, assess and monitor the principal compliance risks that Koç Group faces as a business.

3. COMPLIANCE OBLIGATIONS

3.1. Overview of Obligations

Efficient compliance management can only be achieved by adopting a well-designed and customized Compliance structure. It then can be sustainable if embedded in the company culture and in employee behavior, by being integrated in all processes and operations.

Compliance obligations of Ford Otosan go beyond complying with mandatory regulations (laws, permits, licenses, rules and guidance of regulatory authorities, court decisions, conventions etc.), it also comprises its Compliance commitments such as agreements with third parties, organizational standards such as policy and procedures, or other voluntary commitments.

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.

3.2. Compliance Domains and Risk Analysis

Ford Otosan Compliance Leadership, with relevant business units, shall conduct periodical risk assessments for relevant normative domains, and analyze the specific Compliance related risks that operations, employees and/or Business Partners may be specially exposed to (via questionnaires, workshops, one-to-one interviews etc.). Company policies and procedures shall be drafted/ revised to the extent required in accordance with such assessment and analysis. Reports shall be provided to the Main Shareholders when necessary.

Tailor-made Compliance reviews and analysis consider Ford Otosan's fingerprint, including but not limited to its own characteristic, complexity, risks, willingness to take risks, governance, business lines, products and services, the industry sector, competitiveness of the market, regulatory landscape, potential clients and Business Partners, transactions with foreign governments, payments to foreign governments, use of third parties, gifts, travel and entertainment expenses, charitable contributions. Besides, while the purpose of such compliance risk analysis is to address and take action in all relevant Compliance domains, based on their likelihood and impacts, it is to be considered following subjects including but not limited:

- 1) Anti-Bribery and Corruption
- 2) International Economic Sanctions and Export Controls
- 3) Anti-Money Laundering
- 4) Protection of the Data Privacy
- 5) Compliance to the Competition Law
- 6) Human Rights

4. COMPLIANCE PROGRAM

4.1. Main Components of the Compliance Program

The Compliance Program of Ford Otosan (“**Compliance Program**”) is a set of rules, policies and procedures aiming to address the Compliance issues of Ford Otosan with a risk-based approach. It incorporates the corporate governance and compliance culture and written standards promoted by the senior management, and monitored by the Compliance Leadership, with the participation of all employees.

The main operational pillars of Ford Otosan Compliance Program are the following:

- Prevention
- Detection
- Response

The illustration below represents the components of the Compliance Program and their composition. This framework reflects the general approach and strategy towards Compliance, i.e. the Compliance Program of Ford Otosan.

Illustration I: The Compliance Program of Ford Otosan



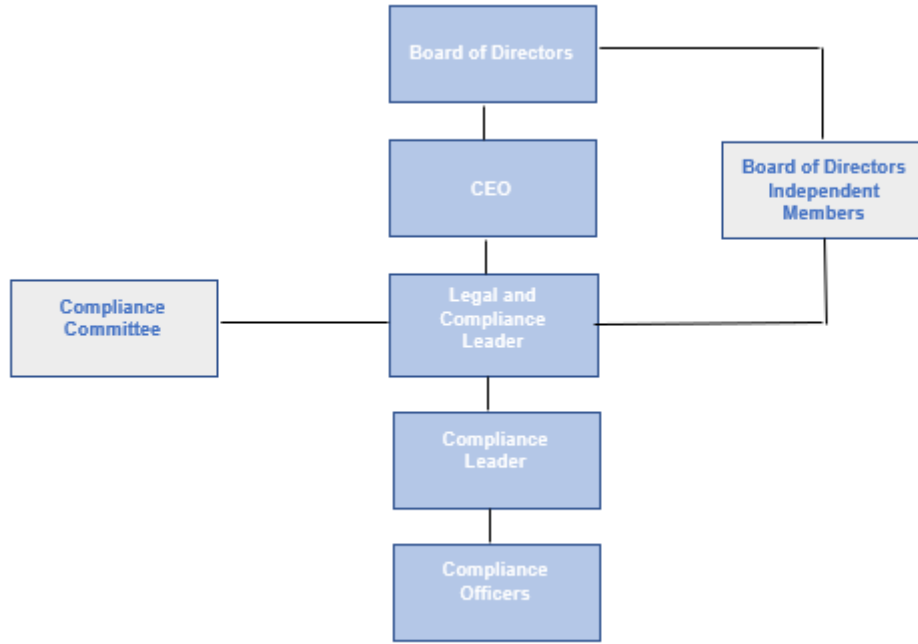
Prevention is managed by Compliance risk assessments, due diligence practices, written policies and procedures as well as communication and trainings. Detection, is supported by technology and data analysis as well as monitoring, testing and audit practices. Response refers to investigations and reporting activities.

4.2. Compliance Organization

Ford Otosan’s approach to Compliance is shaped by the tone at the top, showing the importance senior management attributes to Compliance related issues. By applying the core values, generally accepted corporate governance and ethical standards, the leadership acts as an organization-wide example and helps embed Compliance into the culture, behavior and attitude of Ford Otosan.

A solid Compliance organization is the key to ensuring an effective Compliance structure. The Compliance organization refers to the leadership and organizational structure that is responsible and accountable for the decision-making, development, execution, monitoring and oversight of the Compliance Program. *Illustration II* below presents the current Compliance organization at Ford Otosan.

Illustration II: The Compliance Organization at Ford Otosan



As shown above, the Compliance organization is fulfilled by:

- Ford Otosan Legal and Compliance Leader
- Ford Otosan Compliance Leader
- Compliance Officers
- Compliance Committee
- Independent Members of Board of Directors

Considering the importance of the senior management's leadership towards Compliance related issues, Ford Otosan Leader and the Board of Directors have the overall responsibility to show leadership towards Compliance related issues by monitoring the applications of core values, generally accepted corporate governance and ethical standards.

In order to have a successful Compliance Program, Legal and Compliance Leader position shall have:

- **Empowerment:** Full and clear authority, C-level designation and empowerment to carry out his/her duties.
- **Independence:** In order to preserve its independence, Legal and Compliance Leader reports to the Board of Directors through Independent Members, while directly reporting to the CEO.
- **Seat at the Table:** Legal and Compliance Leader attends the important meetings where all major business decisions are taken.
- **Line of Sight:** Legal and Compliance Leader determines the standards in risk areas even if it is related and implemented by other business units.
- **Resources:** Legal and Compliance Leader has sufficient resources to manage the Compliance Program.

Legal and Compliance Leader performs his/her duties with the support of Compliance Leadership, Legal and Compliance Leader has the ultimate responsibility for the activities of the Compliance Leadership.

The Compliance Leadership has 3 main functions: Functional Responsibilities, Monitoring and Line of Sight.

Functional Responsibilities cover addressing the major risks identified with the Systematic Risk Analysis process, which include but are not limited to the following:

- Identifying and managing Compliance risk areas (including the risks related to Business Partners),
- Ensuring the Compliance risks are classified and analyzed and based on the outcome, prioritized,
- Creating and identifying the policies, procedures and controls which the organization must have to prevent, detect and manage the Compliance breaches,
- Providing or organizing on-going training support for employees and running Compliance awareness campaigns to ensure that all employees are aware of what is expected of them to be complaint with Ford Otosan policies,
- Setting up a Compliance reporting and documentation system for Ford Otosan,
- Establishing Compliance performance indicators, monitoring and measuring of them,
- Analyzing performance of Ford Otosan to identify the need for corrective action plans,
- Ensuring the Compliance Program is reviewed at planned intervals,
- Ensuring that there is access to appropriate professional advice in the establishment and implementation and maintaining of the Compliance Program,
- Ensuring that the Compliance policies, procedures and the other documents are appropriate and accessible to employees and Business Partners,
- Ensuring that Compliance structure is applied uniformly and consistently throughout Ford Otosan,
- Monitoring operability of the processes for reporting and managing information such as complaints and/or feedback by means of whistle-blowing system and other mechanisms and providing support for their development,
- Providing necessary support to ensure that whistleblowing mechanisms are easily accessible, known and confidential.

Monitoring Responsibilities include monitoring and scrutinizing certain Compliance risks, which are deemed primary responsibility of other departments or units. These activities include but are not limited to the following:

- Promoting the inclusion of Compliance responsibilities into job descriptions and employee performance management processes,
- Ensuring only authorized persons have access to the confidential documentation related to the Compliance Program.

Lastly, **Line of Sight** means that the Compliance Leadership acts as an advisory function for all the Compliance related risks identified with the Systematic Risk Analysis.

Considering its roles and responsibilities, Compliance Leadership shall have sufficient and qualified resources and sufficient number of Compliance Officers, who are fully dedicated to the compliance matters.

The Compliance Committee (“Committee”) aims to increase the efficiency of the Compliance structure by consulting to the Legal and Compliance Leader (and the Compliance Leader). The Committee, which consists of the Legal and Compliance Leader, CEO, CFO, Human Resources (HR) Director and the other department’s leaders in case of necessity, acts as an advisory board that provides support to Legal and Compliance Leader in the decision-making process, where necessary.

4.3. Raising Concerns and Disciplinary Actions

4.3.1. Reporting and Whistleblowing

Any stakeholder or employee who witnesses or is aware of any action inconsistent with legal arrangements, Ford Otosan Code of Conduct and Ethical Rules, or any misconduct or who is suspicious of such situation, is expected to raise his/her concerns to the notification channel listed under below title six.

The Hotline is designed to protect the whistleblowers' confidentiality and their anonymity, if requested. It is crucial that anyone who reports an incident should feel comfortable and safe in raising their concerns and should not refrain from reporting. All complaints will be kept confidential and the owners of notification made in good faith will be protected from any possible Retaliation.

In good faith reports, no action will be taken against the person who raised the concern, even if the accuracy of the incident could not be proved by investigation. Those who deliberately make false notifications may be subject to various disciplinary action.

4.3.2 Investigations and Disciplinary Actions

All incidents reported through the Hotline or other channels will be reviewed by the Ethics Evaluation Committee to determine the need for an investigation. When an investigation is initiated and/or concluded, the relevant issue is submitted to Ford Otosan Internal Audit and Ethics Committee for evaluation, depending on the nature of the incident and/or the person subject to the investigation. Recommendations for the disciplinary action are made by the Ethics Evaluation Committee and/or the Internal Audit and Ethics Committee. Ford Otosan Disciplinary Committee is authorized to determine whether any disciplinary punishment will be imposed based on objective criteria and the type of such punishment in matters that are referred to them.

5. PARTICIPATION TO THE COMPLIANCE PROGRAM

All employees and Directors of the Company are obliged to act in accordance with all policies, procedures and instructions that have been or will be implemented within the scope of Ford Otosan Code of Conduct and Ethical Rules and Compliance Program, in particular this Policy, and to participate in all training and awareness activities. Ford Otosan Directors, on the other hand, are responsible for being a role model for the employees and supervising them during the implementation of the Compliance Program. Ford Otosan Compliance Leadership can be consulted for questions regarding this Policy and its implementation.

6. AUTHORITY AND RESPONSIBILITIES

In case of becoming aware of any action that is inconsistent with 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 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.

For questions about this Policy and its implementation, Ford Otosan Compliance Leadership can be consulted.

7. REVISION HISTORY

This Policy takes effect on 29.12.2021 as of the date approved by the Board of Directors of Ford Otomotiv Sanayi A.Ş and is maintained by Legal and Compliance Leadership.