

FORD OTOSAN ETHICS AND WHISTLEBLOWING POLICY

1. PURPOSE AND SCOPE

The purpose of this Ethics and Whistleblowing Policy (“the **Policy**”) is to encourage employees and all stakeholders of Ford Otomotiv Sanayi A.Ş. and its Subsidiaries¹ (“**Ford Otosan**”), to report any activity considered or suspected to be illegal or a misconduct, which therefore constitutes a violation of the applicable legislation and/or Ford Otosan Code of Conduct and Ethical Rules and relevant policies. It also aims to clearly and explicitly state how the employees who in good faith made a notification are protected against any retaliation.

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

2. DEFINITIONS

“**Authorized Person(s)**” mean the terms defined in Article 4.3

“**Business Partners**” include suppliers, distributors, dealers, authorized services, all third party suppliers with whom we have business relationship, representatives, independent contractors, consultants etc. that act on behalf of Ford Otosan and employees and representatives of the above.

“**Disciplinary Penalty**” refers to the type of punishment imposed for breach of employment contract, and/or a behavior that constitutes a violation of applicable legislation and/or a breach of Ford Otosan Code of Conduct and Ethical Rules, related policies, procedures, guidelines, circular notes, and all applicable regulations.²

“**HR**” means Human Resources and Transformation Leadership.

“**Investigation**” refers to the conduct of a scrutiny over ascertaining facts where detailed or attentive examination is performed for related actions and behaviors to ascertain the accuracy.

“**Affiliated Leader**” means the primary leader with whom the employee is directly affiliated.

“**Notification**” means sharing observations and concerns about actions which are suspected to violate laws, internal arrangements such as Ford Otosan Code of Conduct and Ethical Rules, relevant internal policies, procedures, and regulations according to this Policy.

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

“**Retaliation**” means any negative action against the employee based on his/her notification, including but not limited to demotion, disciplinary action, firing, salary reduction, job or shift reassignment as a punishment.

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 For details, please refer to the related Ford Otosan Disciplinary Policy, GPREN-034 Monthly Paid Personnel Disciplinary Procedure and KPREN-026 Hourly Paid Personnel Disciplinary Procedure..

“Whistleblower” means the person who reports notification. This definition covers persons who are or have been employed at the Ford Otosan, Ford Otosan clients, Business Partners and all other stakeholders.

3. GENERAL PRINCIPLES

Ford Otosan attributes great importance to be fully compliant with applicable legislation, international agreements to which the countries where the relevant companies are established, the United Nations Global Compact and all its policies, and the preservation and dissemination of Ford Otosan's ethical culture, performs its activities with integrity and according to the highest ethical standards, and supports “open communication” and “accountability” culture to prevent unethical or illegal actions.

Therefore, Ford Otosan encourages its employees who witnesses an illegal or unethical activity performed by another employee or a Business Partner directly or indirectly, or who gain information about such a situation through legal channels, or who suspect such a situation to express their concerns and encourages their stakeholders to act in this manner.

Ford Otosan carefully assesses all reported notifications and aims to investigate alleged violations as explained below. In this regard, all investigations are conducted as soon as possible after the notification is received by considering the results of the pre-assessment.

4. APPLICATION OF THE POLICY

4.1. Disclosable Matters

Any illegal or unethical behavior or activity which are listed under the headings below (including but not limited to them), and which occurred in the past, may be occurring at the time of notification or is expected to occur in the future may be the subject of Whistleblowing³.

i. Unfair practices against employees

Ford Otosan provides a safe, peaceful and professional working environment for its employees. Therefore, any action against Ford Otosan employees which contradict with the regulations, Ford Otosan Code of Conduct and Ethical Rules or relevant policies and safe and peaceful work environment (mobbing practices⁴, harassment⁵ and sexual harassment⁶ etc.), is not tolerated.

ii. Acts against the interest of the Company

While performing their duties, all Ford Otosan employees act according to our fundamental values and Code of Conduct and Ethical Rules, and avoid behaviors and activities that may

³ Customer complaints about the products and services of Ford Otosan are not covered by this Policy if they are not a Disclosable Matter at the same time.

⁴ Actions by one or more people against another person, through hostile, immoral or unethical methods, which systematically lead to moral coercion.

⁵ Harassment is any verbal, physical, and visual behaviour that includes humiliation, attack or insult towards the characteristics of the person (religion, ethnicity, gender, race, etc.).

⁶ Sexual harassment is verbal comments, gestures and physical acts of a sexual nature that are undesirable, offensive, intentional, or repeatedly derogatory, neglect to respect the rights of others and adversely affect their job performance. In case of sexual harassment allegations, such complaints are promptly addressed and followed up by Ford Otosan, and the process is investigated in an impartial and fair manner. All necessary measures are taken in workplace conditions to protect the complainant.

cause material and/or moral harm to the Ford Otosan such as Misuse of the Company's Data Processing Resources, security or safety problems, fraud, breach of Intellectual and Industrial Property Rights. This can only be achieved when all employees internalize and maintain integrity, honesty, responsibility, trust and respect, which are Ford Otosan's fundamental values. Therefore, any action by Ford Otosan employees that violates our fundamental values shall not be tolerated, regardless of the employee's seniority or roles.

iii. Noncompliant actions of Business Partners

Ford Otosan monitors and evaluates the risks associated with its Business Partners in order to ensure compliance with the principles outlined Ford Otosan Code of Conduct and Ethical Rules and related policies, in particular Ford Otosan Supply Chain Compliance Policy. We do not tolerate any behavior by our Business Partners that violate our Code of Ethics and related policies.

iv. Regulatory breaches

Ford Otosan complies with the regulations in every country where it operates, and in cases where such regulations are unclear, encourages to consult experts to collect information, and expects its employees to act according to the Ford Otosan Code of Conduct and Ethical Rules. The violation of local and or international laws including but not limited to sanctions and export controls, anti-bribery and corruption activities, prevention of laundering proceeds of crime and financing terrorism, protection of competition and personal data, and Capital Market law is not tolerated.

Each of the matters explained in paragraphs (i), (ii), (iii) and (iv) above shall be referred to as "Disclosable Matter" alone and as "Disclosable Matters" together.

4.2. Notification Methods

Ford Otosan employees and all other stakeholders can convey all their notifications regarding the above-mentioned notification issues by using the following methods;

Ford Otosan Ethics Hotline can be reached by:

- Ethics Hotline - 0850 305 50 10
- Ethics E-Mail Address - fordotosan.ethicspoint.com or fordotosanmobile.ethicspoint.com
- <https://www.fordotosan.com.tr/en/corporate/about-ford-otosan/notification-form>
- Human Resources and Transformation Leader
- Company Ethics Representatives (HR Leaders at each location)
- Internal Audit Leader
- Ethics Coordinator
- Legal and Compliance Leader
- Compliance Leader
- Notification channels of the Main Shareholders (via Koç Holding Ethics Line "koc.com.tr/ihbarbildirim" or Ford Motor Company SpeakUp@ford.com)

If an employee, and all management levels (including the members of the Board of Directors) becomes aware of a Disclosable Matters directly, and/or if someone else informs him/her about a Disclosable Matter , he/she is expected to report the situation to Ford Otosan Internal Audit Department, or to Ford Otosan Legal and Compliance Leadership in case of Private Law

violations to ensure that the report is processed according to this Policy, and all information is consolidated as soon as possible.

All notices sent to Ford Otosan are shared with Koç Holding A.Ş. through a system called Global Global Incident Dashboard managed by Koç Holding A.Ş. Notices submitted to the Koç Holding Ethics Hotline are evaluated within the scope of the principles set forth in the Koç Group Whistleblowing Policy⁷.

4.3. Confidentiality, Anonymity and Integrity

Ford Otosan respects Whistleblower's preference to remain anonymous. In this scope, any information reported through Ford Otosan Ethics Hotline and other alternative channels are kept confidential to the extent permitted by the laws.⁸

Accordingly, to the extent permitted by laws, the details of a Notification and all other information gathered during an Investigation shall be shared with persons who are authorized to (i) investigate, (ii) evaluate the subject, and (iii) take action if his/her name is not mentioned in the notification. For the avoidance of doubt, any person whose name is mentioned in a Notification, shall not be authorized to have access or be involved in the assessment or Investigation process.

Confidentiality of the investigation is essential, and the department conducting the investigation is not obligated to give information about the process and result of the investigation to the Whistleblowers.

All individuals who provide information during an Investigation also have an obligation to keep the information they provided or any information they may learn during the Investigation. Likewise, it is obliged to protect and respect the existence of the Investigation, its confidentiality, and individuals involved in the process.

A Whistleblower has the following options while reporting an incident:

- i. Not share his/her name and contact information to remain anonymous,
- ii. Share his/her name and contact information, and allow the notification of this information only to the authorized persons. In this case, the relevant authorized employees can contact the Whistleblower directly to request any information that is needed during an Investigation.

In cases where there is a hesitation about whether to report an event or not, preference should always be used to report the event.

4.4. Zero Tolerance to Retaliation

Ford Otosan encourages individuals to easily report their concerns and supports them. It is crucial that an employee who submits a Notification should feel comfortable and safe and should not worry that their professional life will be adversely effected as long as he/she acts honestly and in good faith. Therefore, the employment contract of an employee who reports an incident without remaining anonymous cannot be terminated with or without cause, he/she

⁷ <https://cdn.koc.com.tr/cmscontainer/kocholding/media/koc/01hakkinda/uyum/policies/koc-group-whistleblowing-policy.pdf>

⁸ See "4.2 Whistleblowing Methods" for alternative whistleblowing channels.

cannot be suspended, dismissed, forced to take paid or unpaid leave, or his position cannot be changed, or a similar action cannot be taken. Ford Otosan does not tolerate any Retaliation to Whistleblower under any circumstances. Retaliations are considered an explicit violation of this Policy and are subject to Disciplinary Penalty.⁹

Ford Otosan protects the Whistleblowers even if accuracy of the incident could not be proved by an Investigation, so long as the Notification is made in good faith, with reasonable grounds and without an intent to victimize or create disadvantages to others or gain a personal advantage. However, those who deliberately make false Notifications may be subject to Disciplinary Penalties. Therefore, it is extremely important that the Notifications are based on observations and can be proved, if possible.

4.5. Investigation Process

All reports communicated through the Hotline and other alternative channels are first reported to the Ethics Coordinator, depending on the subject. The Ethics Coordinator evaluates the review according to the scope and content according to the processes described in the Ethics Review and Reporting Procedure together with the Internal Audit Leadership, the relevant HR officer and/or the Legal and Compliance Leadership.

In this process, it is also evaluated whether the information submitted by a whistleblower (if any) has been obtained in accordance with the law. The department primarily responsible for the investigation may request opinions from different departments that may have information on the subject. In which case it is essential that the said Department provides information and support in a way that does not disrupt the Investigation process. Persons assigned in investigations regarding the allegations of breach, adopt the basic principles stated below.

- Honesty
- Objectivity
- Impartiality
- Confidentiality
- Professionalism
- Competence

If deemed necessary, taking into account the health and effectiveness of the investigation, the employees subject to the report may be replaced on administrative leave by the Company until the Investigation is completed, their place of duty and the operation they work for may be changed, their access to Company resources and facilities may be restricted, Company vehicles and computers may be confiscated. The Human Resources Leaderships and Ethics Evaluation Committee is authorized to take decisions on these issues.

In investigations carried out at Ford Otosan, such as the existence of a hierarchical or functional conflict of interest that may affect impartiality and independent decision-making, and/or the name of the authorized department being included in the notification, the necessity of conducting a comprehensive investigation, or the investigation being conducted in a different location than the country where Ford Otosan is headquartered. Investigations may be conducted by independent third party service providers if other valid reasons exist (eg fast and efficient investigation, need for special expertise, language barriers, etc.). In such a case, the opinions

⁹ See Ford Otosan Disciplinary Policy for details.

and approvals of the Audit Committee Members are taken when necessary, depending on the Subject of the Notification, in the decision to outsource the service.

In the report prepared as a result of the investigation, Ford Otosan Monthly Paid Personnel Disciplinary Procedure and, as the case may be, Ford Otosan Hourly Paid Personnel Disciplinary Procedure are followed in the processes for disciplinary review and punishment.

4.6. Governance Structure

The below-described Governance Structure has been designed in order to ensure compliance with the Code of Ethics throughout Ford Otosan. The members of the Ford Otosan Family shall cooperate with the belowspecified departments and officers and properly ensure the requested information and documents within the framework of the requirements of this governance structure.

- Ethics Board

The Ethics Board is responsible for high level supervision of the establishment and application of the Company's Code of Ethics. It evaluates the decisions and acts of the Internal Audit and Ethics Committee and, conveys its opinions, requests and suggestions to the Internal Audit and Ethics Committee. Where necessary, it informs the Board of Directors. The tasks of the Ethics Board are fulfilled by the Audit Committee working under the Board of Directors.

- Internal Audit and Ethics Committee

Internal Audit and Ethics Committee consists of Ford Otosan Leaders who are Executive Board Members, Financial Affairs Leader (CFO), Human Resources and Transformation Leader, Internal Audit Leader and Legal and Compliance Leader. The main duties of the Internal Audit and Ethics Committee under the Ethics Policy are described in the Internal Audit and Ethics Committee Working Principles document.

- Ethics Assessment Board

Ethics Evaluation Committee: Consists of Human Resources and Transformation Leader, Internal Audit Leader and Legal and Compliance Leader. The main duties of the Ethics Evaluation Committee are described in the Working Principles of the Ethics Evaluation Committee.

4.7. Expectations from the Whistleblowers

In order to ensure that "Disclosure Matter" is well understood clearly and can be evaluated properly and fairly, the Whistleblower is expected to provide sufficient and detailed information as possible. Therefore, Notification to be made by Whistleblowers must contain the answers to the questions below as much as possible:

- Names of the suspect(s),
- Detailed information about the subject;
 - o When/where/among whom did the incident take place?
 - o How many times did the incident take place? Is it recurring? When did it occur for the first time?
 - o If it has not occurred yet, when is it expected to occur?

- When did the Whistleblower become aware of the subject?
- Who else is aware of the issue? If the managers know the issue, have they taken any measures to prevent it?
- Did the Whistleblower directly witness the incident, or did he/she hear it from someone else?
- Did the Whistleblower inform his/her managers? If not, why?
- Is there any evidence about the notified concern?

5. AUTHORITY AND RESPONSIBILITIES

All employees and leaders of Ford Otosan are responsible for complying with this Policy, implementing and supporting the 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 regulations, the stricter of the two, supersede.

Ford Otosan employees may consult the Legal and Compliance Leadership and Internal Audit Leadership 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.

6. REVISION HISTORY

This Policy came into effect with the Board Resolution dated 22.05.2023 and number 2023/16 and is maintained by Legal and Compliance Department.

Revision No.	Revision Date	Description