

Ford Otomotiv Sanayi A.Ş. (“Ford Otosan”)

Human Rights Due Diligence

Ford Otosan adopts the Universal Declaration of Human Rights as a guiding principle and is committed to respecting human rights in all sectors in which it operates. The company prioritises standards such as the “UN Guiding Principles on Business and Human Rights”, the “UN Global Compact”, the “ILO Declaration on Fundamental Principles and Rights at Work”, the “OECD Guidelines for Multinational Enterprises”, and the “Women’s Empowerment Principles”.

Our main principle at Ford Otosan is to create and maintain a positive and professional working environment for our employees. We act in accordance with global ethical principles in matters such as recruitment, promotion, career development, remuneration, benefits, and diversity, and we respect our employees’ rights to establish and join civil society organisations. We strictly prohibit forced labour, child labour, all forms of discrimination and harassment, and strive to employ individuals from diverse cultures, experiences, and backgrounds.

We expect all our employees to comply with Ford Otosan’s Working Principles and Code of Ethics, as well as our Human Rights Policy, and we require all third parties with whom we have business relationships to act in accordance with these principles. We take all necessary steps to ensure this compliance.

Following our first human rights due diligence study in 2022, we implemented the Disciplinary Policy, the Non-Retaliation Policy, and the Diversity, Equality and Inclusion Policy, and in 2023, we updated our Ethics Policy to the Ethics and Whistleblowing Policy. We aim for all employees to complete training on Ford Otosan Working Principles and Code of Ethics, Workplace Harassment and Sexual Harassment, and Non-Retaliation, and we ensure awareness through various activities (announcements, videos, etc.).

Our human rights due diligence process is carried out in an integrated manner with all business units of our company, using a methodological approach based on risks, their impact, and likelihood. The main risk areas assessed include:

- Awareness (Policies and Procedures)
- Working Environment and Practices
- Child Labour Prohibition
- Freedom of Association
- Prevention of Harassment and Violence
- Health and Safety Practices
- Data Privacy
- Working Hours
- Prevention of Forced Labour
- Whistleblowing/Reporting Mechanisms
- Investigation and Disciplinary Processes
- Personal Development and Performance
- Prevention of Discrimination, Employment Equality, and Non-Retaliation

In 2025, a new risk assessment study was conducted with the coordination of our Compliance Leadership and the active participation of all business units, including surveys, one-on-one interviews with employees, workshops, and similar activities. As a result, necessary corrective and preventive actions were planned. Regular surveys are also conducted with selected suppliers to monitor their compliance in this area.

Risk control matrices have been used to classify risks according to their degree, determine control activities, and develop a risk mitigation plan based on impact and likelihood. Key actions include:

Subject	Details	Risk Mitigation Plan
Awareness about HR Policies	To increase employee awareness of new Human Rights policies.	Preparation of training materials on the Non-Retaliation Policy, inclusion of this training in the orientation program for field employees, and addition of Non-Retaliation Training to the compliance training assigned to office employees. Increasing the frequency of awareness activities and communications (announcements, SMS, e-mails, posters, etc.) regarding Human Rights Policies.
Awareness about Ethics Hotline	Addressing employees' concerns about using the Ethics Line and increasing awareness of the possibility to make anonymous reports to the Ethics Line	Increasing awareness about our policies ensuring that employees will not face any retaliation when using the Ethics Hotline and that they can use the Ethics Reporting channels anonymously, as well as placing dedicated information and posters on this subject on the Ford Otosan Ethics Website.
Personal Development & Performance	The objectivity of performance criteria for field employees.	Regular evaluation of performance criteria for field employees.
Disciplinary Process	Employees need more information about the functioning of investigation and disciplinary processes.	Regularly informing employees about disciplinary investigations and decisions (such as complaint topics, number of applications, disciplinary sanctions imposed, etc.) carried out within our company and increasing awareness about the functioning of the Disciplinary Board process.
Work-Life Balance	Planning training for field employees during working hours.	Providing training to field employees regularly within the planned training schedule, ensuring that work-life balance is taken into consideration.

Employees can report unethical or human rights violations via:

- Ethics Hotline: 0850 305 50 10
- Ethics Email: fordotosan.ethicspoint.com or fordotosanmobile.ethicspoint.com
- Online Ethics Communication Form: <https://www.fordotosan.com.tr/tr/kurumsal/fordotosan-hakkinda/etik-iletisim-formu>
- Human Resources and Transformation Leader
- Company Ethics Representatives (HR Leaders at each location)

- Internal Audit Leader
- Ethics Coordinator
- Legal and Compliance Leader
- Compliance Leader
- Whistleblowing channels of our main shareholders (Koç Holding Ethics Hotline “koc.com.tr/ihbarbildirim” or Ford Motor Company SpeakUp@ford.com)