

## FORD OTOSAN INTELLECTUAL PROPERTY COMPLIANCE POLICY

### 1. INTRODUCTION

The widespread development of new technologies that will shape the future can only be possible by creating a sensitive awareness, providing the necessary incentives, raising awareness, and creating intellectual property assets and protecting their rights.

In accordance with its mission to offer innovative automotive products and services that benefit the society, Ford Otosan also considers Intellectual Property Rights while formulating its policies.

### 2. PURPOSE AND SCOPE

This Intellectual Property Compliance Policy (“**Policy**”) sets out the basic principles and guidelines for Ford Otomotiv Sanayi A.Ş. and its Subsidiaries' (collectively referred to as “**Ford Otosan**”) compliance with regulations of Intellectual and Industrial Property law (hereinafter “**Intellectual Property Law**”) as an important part of its commitment to operate in accordance with the law. This Policy has been prepared by also considering the ethical principles of Ford Otosan's primary partners. This Policy aims to provide a transparent administrative system for the control of intellectual property created and owned by Ford Otosan and to take measures when necessary, and to increase awareness of intellectual property law.

Ford Otosan has adopted this Policy to protect its own intellectual property, as well as to minimize the possibility of infringement of the intellectual property rights of Ford Otosan and third parties. In this context, Ford Otosan adopts as a principle to avoid any action that may pose a risk in terms of intellectual property law and to ensure awareness on this issue. All employees and executives of Ford Otosan are obliged to act in accordance with this Policy, which is an integral part of Ford Otosan Code of Conduct and Ethics. Ford Otosan expects its business partners to act in compliance with this Policy to the extent applicable to the relevant party and/or process.

### 3. DEFINITIONS

**Intellectual Property:** This is divided into two groups, namely Copyright and Industrial Property Rights. Copyrights define rights over works such as literature, art, music, adaptations-compilations, cinema, architectural works, software, etc., while industrial property define patents, utility models, trademarks, designs, geographical indications, plant species and integrated circuit topographies.

**Trade secret:** defines any information that has economic value for the commercial activities of businesses, where the owner has an interest in keeping the information confidential and therefore, a loss may arise for the owner if it is made public;

**Office:** defines the institutions of the country where official applications regarding industrial property such as patents, trademarks, designs can be made, especially the Turkish Patent and Trademark Office, or official institutions where community applications can be made;

**Employee:** defines the personnel who work at Ford Otosan, who are employed in accordance with the provisions of the Labor Law and miscellaneous legislations, and who are in any employer-employee relationship with Ford Otosan;

**Employees' invention:** defines in-service inventions or independent inventions that are created by the employee and protectable by patent or utility model;

**In-service invention:** defines inventions that are created by the employee in the course of their employment relationship, either in the course of their obligatory activity in an facility or public agency, or within the fields in which the facility or the public agency operates based largely on the experience and work of the facility or public agency;

**Independent invention:** defines the inventions that are outside the scope of in-service inventions,

**Commercialization:** defines the commercial exploitation of intellectual property rights, including transfer, license, incubator, spin-off company, or any other form of exploitation;

**Intellectual Property Infringement:** defines counterfeiting as a result of partial or complete production of the subject matter of the right without the permission of the intellectual property owner, selling, distributing or putting on the market in any other way, or importing for these purposes, possessing for commercial purposes, using by means of making applicable, or proposing to enter into a contract with respect to products produced by infringement, although it is known or it should have been known that such products have been produced completely or partially by infringement, usurping intellectual property rights, extending the rights granted by the intellectual property owner through contractual license or compulsory license without permission or transferring these rights to third parties;

**Invention Disclosure Form (IDF):** defines the Invention Disclosure Form that is used to notify the employer when the invention is created;

**Intellectual Property Leadership:** defines the team that carries out activities related to Ford Otosan's incentive processes, sustainability, 6 Sigma, Contract management processes and Ford Otosan's intellectual property rights, particularly patents, designs and trademarks.

## 4. BASIC PRINCIPLES

Violation of this policy may result in severe consequences including legal, administrative and criminal sanctions depending on the legislation in the region of operation for Ford Otosan, its executives, employees and business partners, and most importantly, may cause serious damage to Ford Otosan's reputation. Ford Otosan prepares procedures, instructions and information documents, conducts training and awareness raising activities, and carries out regular monitoring activities as part of the “*Intellectual Property Compliance Program*” in order to ensure that its activities do not carry any risk under intellectual property law and that this Policy is implemented. Executives, employees and business partners of Ford Otosan are obliged to carry out their activities falling within the scope of intellectual property rights law in accordance with the relevant provisions in Ford Otosan's relevant procedures, instructions, drills, guidelines,

announcements and signed agreements on this subject and to participate in trainings and programs regarding Ford Otosan's intellectual and industrial property obligations.

## **Basic Principles:**

- Ford Otosan shall encourage its employees to create intellectual property,
- Ford Otosan and its employees shall respect intellectual property and conduct its business in accordance with the applicable intellectual property laws of the countries in which it operates, especially the Republic of Turkey, and the agreements it has made with other companies,
- Ford Otosan shall actively protect its intellectual property that has commercial value,
- Ford Otosan shall maintain an effective IP asset management, including keeping inventory and records of IP-related assets and agreements,
- Ford Otosan shall not knowingly infringe a third party's intellectual property in its products, services, or components, or disclose or use a third party's trade secrets without the explicit or implied consent of the owner or as permitted by law,
- Ford Otosan shall not knowingly purchase or use counterfeit or other infringing goods and services while conducting its business, including counterfeit trademark goods or copyright infringing materials (such as software, publications, video, audio, or other content),
- Ford Otosan, through binding policies or agreements with its employees and suppliers, shall require its employees to comply with applicable intellectual property laws and the company's intellectual property policies and intellectual property-related provisions in contracts with other companies.

## **5. IMPLEMENTATION OF THE POLICY**

### **5.1. Protection of Information Belonging to Ford Otosan**

- a. Employees shall document their inventions in accordance with Ford Otosan procedures and report them to Ford Otosan. Such inventions and information shall not be shared with third parties without the written consent of Ford Otosan.
- b. When intellectual property with commercial potential is created by its employees, Ford Otosan aims to present it in a way that will encourage the development and use of this idea in the most effective way.
- c. Employees shall preserve confidential information regarding intellectual and industrial property belonging to Ford Otosan, its shareholders, suppliers, etc., to which they have access during the fulfilment of their duties, shall not disclose this information to other persons and organizations that are not related to the business, shall sign an appropriate confidentiality agreement in cases where it is necessary to share information with third parties as required by the business, shall provide as much information as required by the business and shall take the necessary measures to protect the confidentiality of the information. Employees are obliged to fulfill all the matters detailed in the Confidentiality Obligation Contract. Employees must comply with the confidentiality obligation even after leaving Ford Otosan.
- d. It is forbidden to discuss company's confidential information in dining halls, cafeterias, elevators, service cars and similar public places. It is forbidden to share confidential information such as investments, projects, revenues, business negotiations, products,

prototypes, designs, processes, investment amounts, costs, profits, margins and prices, trade secrets and confidential information that the company has not yet disclosed to the public on social media and similar channels. In particular, it is forbidden to take photographs of products during the project phase, production and rest areas, R&D studies, presentations and visuals at meetings, and to send any existing photographs to third parties within or outside the company.

- e. Employees shall label information and documents with appropriate categories according to their confidentiality and trade secret nature.
- f. When employees detect unauthorized or illegal use of Ford Otosan's intellectual and industrial property, they shall take the necessary measures within the scope of Ford Otosan procedures.

## 5.2. Protection of Intellectual Property Rights of Third Parties

- a. Ford Otosan shall avoid actions that may lead to the violation of intellectual property rights of third parties within the scope of its activities. Employees shall take all necessary measures to comply with these matters and shall immediately report any non-compliance that they become aware of to the R&D and Intellectual Property Leadership and Legal and Compliance Leadership.
- b. Employees shall not disclose to Ford Otosan or other employees any non-public confidential information and documents of their previous employers and shall not ask other employees to disclose such information and documents of their previous employers.
- c. Employees shall not copy or use copyrighted works without the permission of the copyright owner.

## 5.3. Training and Monitoring

Ford Otosan Intellectual Property Leadership

- Provides regular training on intellectual property rights to all employees,
- Adapts this Policy to the needs of the company, if necessary, prepares the necessary procedures and the necessary reports,
- Reviews the content of the company's own procedures and trainings and monitors their completion in coordination with its main partners.

## 5.4. Employees' Inventions and Commercialization

Ford Otosan makes the necessary applications for inventions created by its employees by following the steps specified in its internal procedures and supports the commercialization of innovative ideas.

Ford Otosan

- Monitors the transformation of the invention for which full rights are claimed within the scope of employees' inventions into a product,
- Calculates the payment to be made to the employee over the licensing fee according to the procedures stipulated in the law and regulation and makes the payment to the employee, if the invention is licensed.

- calculates the payment to be made to the employee according to the procedures stipulated in the law and regulations and makes the payment to the employee, if the invention is utilized on any vehicle or in the facilities.

## 6. POWERS AND RESPONSIBILITIES

All employees and executives of Ford Otosan are responsible for complying with this Policy and implementing and supporting Ford Otosan's relevant procedures and controls in accordance with the requirements in this Policy.

Ford Otosan expects all business partners to act in compliance with this Policy to the extent applicable to the relevant party and process. In case there is a difference between this Policy and the local legislation applicable in the countries where Ford Otosan operates, the more restrictive of the Policy or the legislation shall be valid to the extent that the relevant practice does not contradict the local legislation.

Ford Otosan Intellectual Property Rights Leadership is responsible for implementing that this Policy and updating it when necessary. Ford Otosan Intellectual Property Leadership shall be contacted in case of any action that is thought to be contrary to this Policy or the applicable legislation.

The Intellectual Property Board, established to provide strategic guidance on all matters related to Intellectual Property Rights within the framework of this Policy, will operate in accordance with the Intellectual Property Board Procedure No. **GPRUG-117**.

## 7. REVISION HISTORY

This Policy has entered into force with the Board of Directors Decision dated 27.06.2024. Ford Otosan Intellectual Property Rights Leadership is responsible for updating this Policy.

Revision	Date	Description