

**FORD OTOMOTİV SANAYİ A.Ş.
LEGISLATIVE COMPLIANCE POLICY****1 PURPOSE AND SCOPE**

The purpose of this Legislative Compliance Policy (“**the Policy**”) is to establish principles and rules to be implemented within Ford Otomotiv Sanayi A.Ş. (“**Ford Otosan**”) as a reflection of its commitment to operate in accordance with the laws, international agreements and other legislation to which it is subject.

All employees, directors and officers of Ford Otosan shall comply with this Policy, which is an integral part of Ford Otosan Code of Conduct and Ethical Rules¹.

2 DEFINITIONS

“**Area Coordination Officer**” refers to the leader appointed by the relevant Business or Platform Area Leader to appoint Legislation Compliance Officers within the necessary Departments of the respective area, ensure coordination between the Business or Platform Area Leader, Legislation Compliance Officers, and the Legislation Compliance Coordinator in line with the objectives of this Policy, and ensure the execution and reporting of Periodic Compliance Checks within the respective Business or Platform Area.

“**Department**” refers to the business units under each Business or Platform Area in which a Legislation Compliance Officer is appointed.

“**Employee(s)**” mean employees of Ford Otosan.

“**Regulatory Authority**” refers to national, international, or supranational public institutions and organizations that have the authority to issue, interpret, implement and/or supervise regulations and legislation in areas in which the Company operates. This includes, but is not limited to, authorities such as the European Commission, United Nations Economic Commission for Europe (“UNECE”), EDPB, Turkish Ministry of Trade, Competition Authority, Energy Market Regulatory Authority, Capital Markets Board, Personal Data Protection Authority, Turkish Standards Institution, and the Information and Communication Technologies Authority.

“**Homologation**” refers to the official approval process by competent regulatory authorities that verifies whether a product—particularly a motor vehicle or its component—complies with specific technical regulations and legal requirements. This process includes type approval, conformity assessment, test reports, and certification steps. Without completing this process, the product cannot be marketed or used in the relevant market.

“**Critical Article**” refers to Legislation articles that, if not complied with, may lead to at least one of the following situations: a) Creating a financial risk exceeding one million euros for the Company, b) Interrupting or significantly impairing the Company’s operations, c) Posing a potential for criminal or significant financial liability for Company employees, d) Creating a risk of significant negative impact on the Company’s reputation on a national scale.

“**Critical Article Inventory**” refers to the inventory prepared by each Department regarding its own operations, which contains the Critical Articles that the Company must comply with.

¹ <https://www.fordotosan.com.tr/tr/kurumsal/ford-otosan-hakkında/politikalarımız>

“Legislation Inventory” refers to the inventory of Legislation with which Departments must comply due to their specific business and operational activities.

“Legislation Inventory System” refers to the electronic system where relevant Legislation Inventory, Critical Article Inventory, and Permit Inventory will be stored.

“Legislation Compliance Officer” refers to the employee responsible for identifying and monitoring the Legislation and Permits directly related to their Department’s field of activity, providing input on draft Legislation, coordinating the interpretation and implementation of such Legislation within the business unit, conducting Periodic Compliance Checks, preparing corrective action plans, and reporting these matters.

“Legislation Compliance Coordinator” refers to the employee designated within Legal & Compliance Leadership, who is in charge of coordinating the necessary governance activities for the efficient functioning of this Policy.

“Stakeholder List” refers to the list of Area Coordination Officers, Legislation Compliance Officers, and SMEs appointed under this Policy.

“Periodic Compliance Check” refers to the process conducted at least once a year in each Business / Platform Area under the supervision of the respective Area Coordination Officer. It includes the review and reporting by all Legislation Compliance Officers in that area on the Department’s compliance with the Legislation Inventory, validity and conformity of the Permits and the up-to-dateness of such Inventories.

“Permit” refers to the requirements such as permits, approvals, documents, licenses, and certificates that must be obtained from all official authorities including Regulatory Authorities in order to carry out company activities.

“Permit Inventory” refers to the inventory listing Permits obtained/needed to be obtained for company activities.

“Champion Coordinator” refers to the senior leader responsible for overseeing a Legislation Compliance Program and reporting to the Company’s Strategy Committee in cases where such Program is required for adhering to Legislation. The Champion Coordinator should primarily be the leader of the Business or Platform Area most impacted by the outcomes of the Legislation Compliance Program. In cases where the Legislation Compliance Program affects multiple Business or Platform Areas, the Champion Coordinator is appointed by the Strategy Committee when deemed necessary.

“Strategy Committee” refers to the senior management committee attended by the Ford Otosan Leaders and certain senior leaders, during which the Company’s strategic objectives are reviewed.

“Company” refers to Ford Otosan.

“Technical Regulation” refers to regulations that specify the mandatory technical criteria to be fulfilled for the placing on the market, type approval, or use of vehicles or vehicle components. These are generally issued within the framework of EU technical legislation, UNECE regulations, or other binding technical frameworks.

“Compliance Committee” refers to the advisory board composed of the Ford Otosan Leader, Finance Platform Area Leader, Human Resources and Transformation Leader, Compliance Leader, the Legal and

Compliance Leader, and other Department leaders when necessary; its purpose is to exchange views to enhance the effectiveness of the compliance structure and to support the decision-making process when required.

“Legislation Compliance Program” refers to the activities carried out by the Company to ensure adherence to Legislation.

“Subject Matter Expert (SME)” refers to an expert who possesses specific knowledge, experience, competence, and know-how in the context of ensuring legislative compliance. The Expert may be an employee of the Company or, if deemed necessary, external expertise may also be engaged.

“Legislation” refers to all binding national and international laws and regulations in force in the countries where Ford Otosan operates or offers products or services. This includes local laws, decrees, regulations, administrative acts, implementation guidelines and technical compliance guides issued by Regulatory Authorities, regulatory statements, binding industry standards, and directly applicable normative acts of supranational institutions such as the European Union.

3 GENERAL PRINCIPLES

Ford Otosan adopts as a principle not only ensuring compliance with current Legislation but also contributing to the development of future legislation and regulations in line with technical, operational, and strategic needs.

Platform and Business Area Leaders are responsible for ensuring the appointment of Area Coordination Officers and Legislation Compliance Officers within their respective areas and for exercising top-level oversight of the ongoing legislative compliance activities.

The responsibility for compliance with and monitoring of Legislation lies with the relevant leaders of the Departments. Within this principle, Leaderships are obliged to learn the current and draft Legislation applicable to their activities, monitor changes in such Legislation, inform employees about Legislation requirements, carry out the necessary compliance and awareness efforts, obtain and keep required Permits up to date during their activities, manage risks identified in these processes, inform the Company’s stakeholders about such risks, and actively operate the governance model described in this Policy within their respective Departments.

Each Department shall regularly check and report the compliance status and the up-to-dateness of its own Legislation Inventory, Critical Article Inventory, and Permit Inventory.

A centralized and digital Legislation Inventory System shall be established for the storage of the Legislation Inventory, Critical Article Inventory, and Permit Inventory. The establishment and operation of the Legislation Inventory System shall be under the responsibility of the Legal and Compliance Leadership with the support of the Digital Products and Services Leadership.

Technical Regulation compliance and Homologation processes shall be carried out by the Homologation & Regulatory Compliance Leadership. This function ensures a holistic management of the entire process—from the drafting of Technical Regulations to type approval, system approvals, and product certification.

Legislation compliance, amendment, and draft governance shall be carried out in accordance with the principles set forth in this Policy.

4 APPLICATION OF THE POLICY

4.1 Governance Model

Area Coordination Officers coordinate the compliance processes with Legislation within the relevant Business/Platform Areas, while Legislation Compliance Officers are responsible for ensuring compliance with Legislation at the Department level.

Legislation Compliance Officers identify the applicable Legislation and Permits for the Department's business and operations, prepare and keep up to date the Legislation and Permit Inventories. For Critical Articles within the Legislation Inventory, a detailed Critical Article Inventory is also created. The tracking and management of these inventories are carried out through the Legislation Inventory System.

Champion Coordinator oversees the preparation of the project plan for Legislation Compliance Programs with a holistic perspective and ensures that the project is executed in accordance with the timeline. The Champion Coordinator also appoints leaders for project management and coordination when necessary and provides updates on the project's progress to the Strategy Committee and the Early Detection and Risk Management Committee.

For the interpretation of Legislation and ensuring compliance, opinions and recommendations of SMEs should be taken. If there is no internal SME within the Company for the relevant area, external support may be sourced. The Legal and Compliance Leadership is responsible for publishing and keeping up to date the Stakeholder List, which also includes information on internal SMEs.

The Legal and Compliance Leadership oversees the implementation of this Policy and ensures the creation of the necessary digital infrastructure for the Legislation Inventory System with the support of the Digital Products and Services Leadership. It also supports the interpretation of Legislation at the Department level and informs relevant stakeholders about changes in Legislation and draft amendments submitted to its attention.

The Legislation Compliance Coordinator ensures the coordination of governance activities for the effective implementation of Legislation compliance across the Company, oversees the flow of information and consistency of processes with relevant Departments, and carries out the top-level supervision of Periodic Compliance Checks.

4.2 Annual Control and Reporting

The Legislation Compliance Officer checks at least once a year, as part of the Periodic Compliance Check, whether the Legislation, Critical Article, and Permit Inventories are up to date, makes updates where necessary, and reports the compliance status with Legislation across all inventories to the Area Coordination Officer. This assessment ensures the periodic verification of how well the Company's current practices align with its obligations under the Legislation applicable to the areas in which it operates.

The Area Coordination Officer consolidates the results submitted by all Legislation Compliance Officers within their respective Business or Platform Area and reports them to the relevant Business or Platform Area Leader, the Legal and Compliance Leadership, the Corporate Risk Management Leadership, Internal Audit Leadership, and, when necessary, the Internal Control Leadership.

The Legal and Compliance Leadership regularly informs the Compliance Committee and the Early Detection and Risk Management Committee on the activities and implementation results within the scope of this Policy.

5 AUTHORITY AND RESPONSIBILITIES

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

If there is a discrepancy between the local regulations, applicable in the countries where Ford Otosan operates, and this Policy, the stricter of the two shall prevail, unless such practice is in violation of the relevant local laws and regulations.

In case of becoming aware of any action that is inconsistent with this Policy, employees should contact 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.

You can send all your questions or notices regarding ethical violation by calling “0850 305 50 10”, emailing 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.

Ford Otosan employees may contact the Legal and Compliance Leadership of Ford Otosan for their questions regarding this Policy and its application. This Policy is maintained by the Legal and Compliance Leadership.

6 REVISION HISTORY

This Policy entered into force with the Board of Directors' Resolution dated 30.12.2025 and numbered 2025/33.

Revision	Date	Description