

# Procedure of the grievance mechanism



# Introduction to the Ford grievance mechanism

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# Introduction to the grievance mechanism from Ford

Ford Motor Company is committed to building a better world where everyone can move freely and pursue their dreams. We strive to improve access to transportation, protect our environment, promote the health and well-being of the communities that surround us, and respect the rights of the people who live there. Our commitment to achieving positive results and respecting human rights is enshrined in our policy "We are committed to protecting human rights and the environment" and in everything we do. We are committed to respecting the United Nations (UN) Guiding Principles on Business and Human Rights and all applicable supply chain due diligence laws and align our due diligence processes accordingly.

We are committed to protecting [human rights and the environment](#). Our established policies define how we conduct our business with respect to human rights and the environment, including Ford's suppliers and business partners. Accordingly, the [Supplier Code of Conduct](#) sets out both our requirements and expectations for supplier relationships in the areas of human rights, the environment, responsible sourcing of materials, responsible and lawful business practices and the related implementation of these principles. We explicitly require our suppliers to follow all applicable Ford policies, to comply with or exceed all applicable laws and regulations, and to incorporate these into their own supply chain and with their own suppliers.

The grievance procedure described below is an essential building block for upholding and protecting the United Nations (UN) Guiding Principles on Business and Human Rights, other relevant laws and guidelines and our corporate values based on them. The complaints procedure serves as an important early warning system for us to uncover and investigate possible violations of rights and grievances and to take appropriate measures to remedy them immediately. Ideally, we receive information at such an early stage that we can take appropriate countermeasures before people or the environment are harmed.

# Start of the grievance mechanism

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# Start of the grievance mechanism

The grievance mechanism covers the following areas for legal violations and grievances within our supply chain of direct or indirect suppliers:

- Human rights violations and abuses resulting from breaches of international agreements, such as
  - International Bill of Human Rights (The United Nations Universal Declaration of Human Rights and its two Covenants) 1948
  - International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work (1998)
  - United Nations (UN) Guiding Principles on Business and Human Rights (2011)
  - Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises (2011 Edition)
  - UN Women's Empowerment Principles (2010)
- Environmental violations and abuses resulting from breaches of international agreements, such as
  - OECD Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas (2016 Edition)

- UN CEO Water Mandates
- Minamata Convention on Mercury of October 10, 2013 (Minamata Convention)
- Legal violations and grievances resulting from breaches of internal or industry-specific guidelines, such as
  - Supplier Code of Conduct
  - Automotive Industry Guiding Principles (2017)
- Legal violations and abuses resulting from breaches of current legislation, such as the German Supply Chain Due Diligence Act (SCDDA; Lieferkettensorgfaltspflichtengesetz – LkSG)

## Group of persons affected and content of the complaint

1. **Group of persons**  
In principle, any person can submit a complaint about possible legal violations and grievances within our supply chain that affect direct or indirect suppliers via our corresponding reporting channels.
2. **Content of the complaint and description of the facts**  
The following information supports further investigation and efficiency, but is not mandatory:
  - **Where** (e.g. name of supplier with address)
  - **When?** (e.g. date and time when the violation or abuse was observed)
  - **Who and what** (e.g. as comprehensive and detailed information as possible on the violation

and the grievance, information on the group of persons affected, number of persons affected, severity of the possible violation)

- **How** (e.g. documentation through photos, videos, documents or witnesses)
- **Expectations and aim of the complaint** (e.g. what preventive or remedial measures are expected, what is the specific aim of the complaint?)

## Accessibility via various reporting channels

To ensure that violations of human rights or environmental risks can be reported along the entire supply chain, we offer the following complaint channels:

1. **Worker's Voices app ("RBA Voices") or access via a QR code**  
The QR code below directs the complainant to our mobile application (app), which can be downloaded and through which the complainant can get a complete overview of the submitted complaint at any time. The complaint is always accessible through the app and reflects real-time updates. Once installed, use the "Feedback" pictogram to submit your complaint.

Our app offers further information and videos about the complaints procedure.



**2. Homepage and web form**

The complaint can also be submitted via the web form on our company website. To ensure communication, the complainant receives a case number for traceability purposes, which they can access at any time to view the status of the submitted complaint.

Our homepage and web form provide further information and videos about the grievance procedure.

[Start External Grievance Mechanism](#) 

**3. Access data via telephone and hotline:**

Ford offers various country-specific telephone numbers:

Country	Type	Phone Number
China	National	4001200796
Germany	free of charge	08001808120
Japan	free of charge	8009196565
Korea South	free of charge	3084910156
Malaysia	free of charge	1800812709
Mexico	free of charge	8001122677
Nepal	free of charge	8000010153
Philippines	free of charge	180013220558
Taiwan	free of charge	801128131
Thailand	free of charge	1800019075
Thailand	free of charge	1800019083
Turkey	free of charge	8006212363
United States	free of charge	18882053318
Vietnam	Local	2844581378

**4. Postal address**

"Department for Sustainability in the Supply Chain"  
 c/o Ford Werke GmbH  
 Henry-Ford Street 1  
 50735 Cologne  
 Cologne, Germany

**5. Alternative options**

Ford strives to keep access barriers as low as possible to ensure easy access to our complaints procedure for particularly vulnerable groups, such as children or people who have not been literate. Ford therefore regularly reviews whether the existing channels of our complaints procedure are sufficient and / or can be improved, e.g. improvement of the app, additional procedural languages, etc.

In addition to the channels mentioned above, we point out alternative options that can be used to submit or track a complaint:

- The complainant can borrow a cell phone, laptop or tablet to access RBA Voices, as long as they

note down or remember the login details, they can access it from any phone or laptop/tablet;

- Local civil society organizations and other stakeholders also have the option to submit feedback on behalf of another person via our public web form, provided they identify the specific facility in the form and have evidence that this facility is in our supply chain;
- Employee representatives may also submit feedback on behalf of another person if they identify the specific facility on the form and have evidence that this facility is in our supply chain.

## Language of the grievance process

The working language of the grievance mechanism is generally German and English, which is primarily used by the "Supply Chain Sustainability Team" (hereinafter: "SCS Team"). Ford endeavors to communicate in the language of the complainant upon request and a translation tool with a variety of different languages is available in the Worker's Voices App or the web form.

## Confidentiality of identity

The submitted complaint is only processed by the specialized and centralized "SCS Team". Only this department can view and process the complaint and communicate with the complainant. The employees entrusted with the complaints are specially trained to ensure that the information submitted is treated confidentially vis-à-vis internal departments or external contacts. This applies in particular to personal data.

We remain committed to protect the confidentiality of the complainant's identity and ensure effective protection against disadvantage or punishment as a result of the complaint while respecting any applicable local laws and regulations including statutory or regulatory disclosure requirements (e.g., requests for information by competent authorities) and data privacy laws and regulations.

All complaints submitted, whether anonymous or not, will be processed according to the following procedure.

# Course of the grievance mechanism

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10 - Confirmation of receipt, documentation and clarification of the facts

10 - Investigation and educational measures, implementation

11 - Conclusion of the complaints procedure

11 - Communication with the complainant/whistleblower



# Course of the grievance mechanism

## Overview and duration of the individual process steps

A. The grievance mechanism process is shown below, including details on each step:

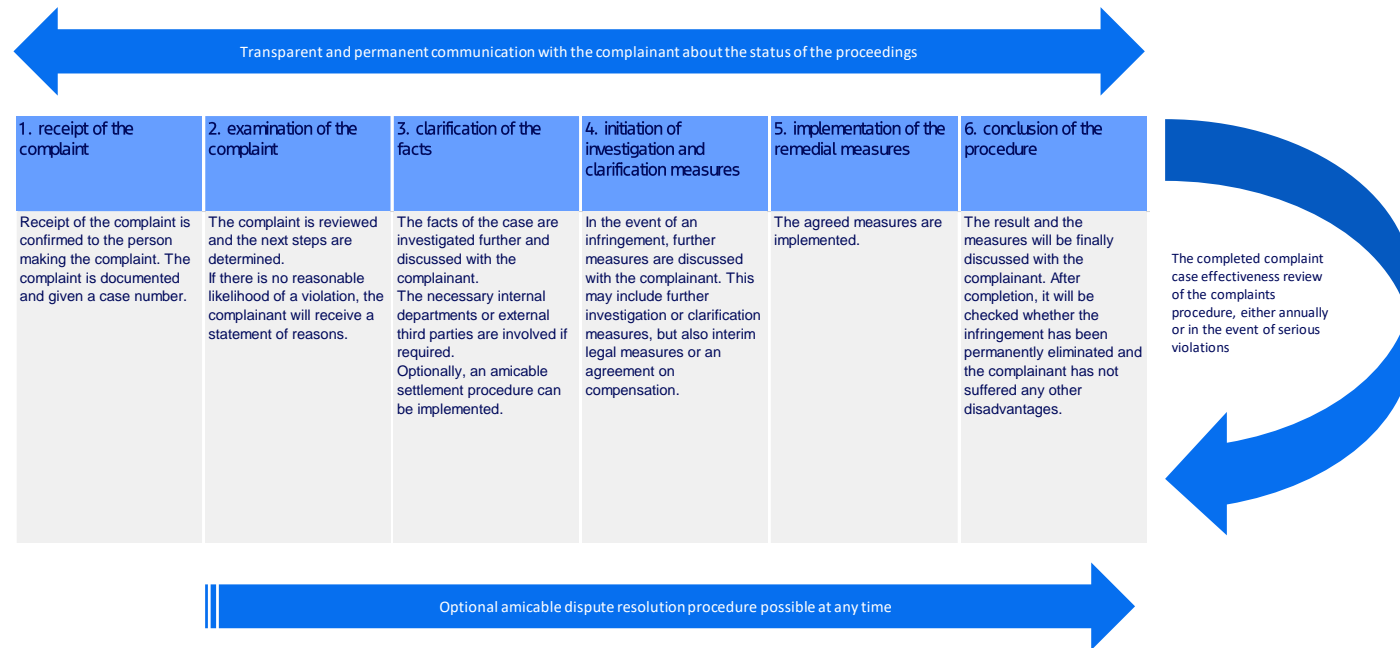
The duration of the grievance mechanism depends on various factors, such as the type and scope of the information provided by the complainant, the number of persons or suppliers affected, the level of detail of the infringement and the grievances, etc.

We generally try to adhere to the following time periods:

- **Process Step 2:** Confirmation of receipt to the complainant within 24 hours or one working day (Monday to Friday).
- **Process Step 3:** Classification and forwarding within 7

working days.

- **Process steps 4 and following:** Investigation periods vary and complaints are provided regular updates.



## Confirmation of receipt, documentation and clarification of the facts (Steps 1-3)

As soon as the complainant has submitted a complaint through our reporting channels (QR code, website form or telephone) they will receive an acknowledgement of receipt, including a case number for traceability. In addition to the acknowledgement of receipt, the complainant receives additional information about the next steps, the timeline of the process, and their rights and protection against retaliation as a result of their good faith report of a violation of policy or law.

When using the website form, the complainant must remember the login details to ensure further communication. All complaints submitted will be processed anonymously and with due care.

Our "SCS Team" carries out an initial review of the complaint. This includes a plausibility check of the complaint details and the validity of the facts presented.

The aim of this review is to determine whether there is a sufficient probability of a violation of the law or malpractice within our supply chain at our direct or indirect suppliers. For the final assessment of whether there is a suspected violation of the law or protected legal positions, it may be necessary to obtain further information and / or consult with the complainant in order to fully understand the facts.

If necessary, the complainant is informed of the status of the procedure and notified of the next steps. The complainant has access to their complaint, the status, time details and other details of the case at any time using the review number or via the app.

The facts of the case are discussed with the complainant (if the request was not made anonymously) to gain a better understanding of the facts of the case and to instill confidence in the complaints process.

If there are appropriate indications, the "SCS Team" can offer the complainant an amicable settlement procedure. The aim of this procedure is to lead the parties involved to a mutually agreeable solution with the help of a neutral third party (e.g. mediation procedure). In addition, costs for the parties involved can be reduced before more extensive investigations are initiated in the further course of the proceedings.

## Investigation and educational measures, implementation (Steps 4-5)

If a sufficient probability of a violation of the law or protected legal positions is established, the "SCS Team" examines what follow-up measures are required. This includes further clarification and investigation measures so that the facts of the case and the violation can be fully defined.

The processing and coordination of these steps is carried out exclusively by the "SCS Team", which is staffed by qualified and experienced employees who initiate further steps independently and in compliance with confidentiality. They are authorized to conduct in-depth investigations and forward the complaint to other departments or involve them, such as the legal department, purchasing department or independent third parties. Possible interim measures or initial legal action may also be considered.

Once the complaint has been reviewed and correctly categorized, the team begins work on the remediation process. The duration of the remediation process varies from case to case as all parties need to be involved to understand the case, end the violation or grievance, and work on a long-term solution to avoid similar issues in the future. If the complainant does not agree with the progress communicated, there is always the possibility of "escalation". In this case, an independent third party is called in to mediate and possibly involve other interest groups. The third party is the Responsible Business Alliance (RBA), which is the world's largest association of companies dedicated to corporate social responsibility in global supply chains ([Responsible Business Alliance](#)) since it is founding in 2004.

The planned remedial measures are discussed with the complainant and, if necessary, an agreement on reparations is reached. The measures are then implemented.

## Completion of the grievance mechanism (Step 6)

If there is no sufficient likelihood of a violation of the law or maladministration, the complaints procedure may be discontinued in the previous stages of the process. The complainant will be informed of this after discussion. The reasons for discontinuation will also be stated and explained. The proceedings may also be discontinued if it is not possible to sufficiently clarify the facts of the case or discuss them with the complainant for practical reasons (e.g. lack of availability) or substantive reasons (e.g. insufficient clarification of understanding or evidence).

If the follow-up measures reveal a sufficient probability of a violation of the law or an abuse, the "SCS Team" prepares appropriate measures and corporate decisions that are reasonable and suitable to end the identified violation of the law or abuse immediately and to exclude a renewed violation of the law in the future.

Once all follow-up measures have been implemented and completed, the complaint is archived. A summary including the outcome is communicated to the complainant. The complainant is asked for feedback and has the opportunity to escalate the case further.

In order to improve the internal risk analysis process and potential ad hoc initiatives, the knowledge gained is used to review and, if necessary, adjust internal processes and procedures.

## Communication with the complainant/whistleblower

In all steps of the procedure, Ford attempts to ensure transparent and permanent communication with the complainant. The complainant should be informed about the procedural steps at all times and be able to follow the progress.

# General principles of the grievance mechanism

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13 - [Protection of the complainant against discrimination](#)  
13 - [Basic procedural principles](#)

# General principles of the grievance mechanism

## Protection of the complainant against discrimination

We ensure through appropriate training of our employees that they are sensitized to actively intervene even at the slightest sign of possible discrimination or other reprisals against the complainant. Within the scope of the possibilities available to the company, we will propose measures to protect the complainant from disadvantages or penalties in the best possible way.

In addition, the complainant can escalate the case at any time, even after the complaint procedure has ended and been closed, if, for example, they are confronted with retaliatory measures as a result of the submitted complaint.

We expressly do not tolerate any retaliatory measures or intimidation and discrimination against the complainant.

## Basic procedural principles

### Fair procedure and principle of proportionality

The complaints procedure, the investigative measures and the

preventive or remedial measures to be implemented as a result of possible legal violations comply with applicable laws. Investigations are conducted on a neutral basis and only legally usable information is taken into account.

All process steps and measures for determining the facts are subject to the principle of appropriateness and effectiveness. This means that the measures must be suitable, necessary and appropriate in order to effectively fulfill the intended purpose.

### Complaints Officer

Ford has set up a centralized "SCS Team" to ensure an effective complaints procedure. The employees are trained and have specialized qualifications. They perform their duties with the appropriate level of independence and impartiality, are not bound by instructions and are obliged to maintain confidentiality.

If you have any further questions, please do not hesitate to contact us.

Postal address:

"Supply Chain Sustainability"  
c/o Ford Werke GmbH  
Henry-Ford Street 1  
50735 Cologne  
Cologne, Germany

### Annual and/or ad hoc review of the complaints procedure

Our complaints procedure, including this procedural documentation, is subject to an effectiveness review at least once a year. We also review our processes on an ad hoc basis for each complaints procedure carried out, e.g.:

- Legitimacy and accessibility: Are the responsibilities clearly regulated and the access channels sufficient or are adjustments necessary?
- Predictability and balance: Is the specified time frame for the individual process steps still correct? Is sufficient information available to the potential target groups?
- Transparency: Is there transparent communication with the whistleblower with continuous feedback?
- Compatible with rights and dialog: Are the remedial measures implemented in line with human rights standards? Is there sufficient communication with the complainant, even after the procedure has been completed?

### Data protection regulations

This process documentation and the handling of the complaint follow the rules of the General Data Protection Regulation, including the collection, use and disclosure of personal data through and in connection with the online complaint reporting system.

For further details please follow this link:

[Overview of data protection & legal information \(ford.de\)](https://ford.de)

**Trade secrets**

Ford's trade and business secrets, in particular documents and information subject to confidentiality, shall be adequately protected irrespective of the requirements of this grievance mechanism.

**Legal basis of the grievance mechanism, costs**

The complaints procedure described here covers complaints within the framework of the law on corporate due diligence in supply chains and meets the requirements of the Whistleblower Protection Act.

Ford also has other grievance procedures, such as whistleblowing. In the event that complaints that are not intended for this procedure are reported, our "department" ensures that these complaints are forwarded to the relevant departments.

The complainant will not incur any costs for making use of the grievance mechanism. However, Ford will not assume any costs incurred by the complainant in the course of the grievance mechanism, such as travel or legal fees.

*Ford*