

**Ford Code of Human Rights, Basic Working Conditions and Corporate Responsibility**  
***Pre-Site Visit Facility Survey***

<b>Date</b>	11/1/2018
<b>Location / Facility</b>	Ohio Assembly Plant

**Perception and Understanding of Code**

1. In your opinion, what is the greatest value-add of conducting human rights assessments at Ford's owned and operated facilities?

Here at Ohio Assembly plant, it provides us an opportunity to step back and review our processes and values. We strive to uphold human rights and feel it is an obligation we have to both our workforce and community. Our employees need to know that Ford is a place that values them and promotes human rights throughout. These assessments ensure you are living up to your commitment.

2. When you look at the code, and imagine using it to assess current practice at Ford facilities, what are the greatest areas of non-compliance that you might predict? How do you think management, workers and employee representatives at Ford facilities will view these assessments?

We don't foresee any areas of non-compliance at Ohio Assembly Plant. We expect nothing but positive reinforcement from our workforce on these assessments.

**Facility Conditions**  
***Human Rights***

In order to gauge human rights risks, it is imperative that business enterprises identify and assess any actual or potential adverse human rights impacts with which they may be involved either through their own activities or as a result of their business relationships. Please answer the following questions to describe how your facility approaches assessment and management of human rights risks.

1. In your opinion, what does upholding human rights mean to your facility?

Upholding human rights at Ohio Assembly Plant means that you are providing your employees with an environment to succeed both professionally and personally without fear of harassment, discrimination or retaliation. Ohio Assembly is committed from the plant manager down to upholding the directives of the B-110 and all state and federal guidelines.

2. How is the preservation of human rights monitored in your facility?

Ohio Assembly Plant proudly displays all Ford Motor Company, state and federal guidelines once you enter the doors of the facility. In addition, we also participate in the annual Affirmative Action Plan audit administered by the federal government. These rights are also monitored through plant manager and operating committee skip level meetings, weekly culture walks, personal relations survey and both hourly and salary PULSE surveys. We have an open door policy and also a hotline and email set up to report harassment or discrimination.

3. How is your facility working to reduce human rights risks? Please describe any particular processes or initiatives.

Employees are trained or refreshed in many different forums here at Ohio Assembly. First, is the corporate online website called [intergrity.ford.com](http://intergrity.ford.com). This website has mandatory training and classes such codes of conducts, ethics, bribery, laws, etc. Locally, we have single point lessons or stand downs. These are more formal as you address the employees face to face. There are ongoing communications to remind employees of the different policies and initiatives.

4. How is your facility monitoring human rights risks?

Results of the surveys and skip levels referenced in previous responses are monitored and shared with Human Resources and Plant Leadership for action planning to address issues that get raised. Having open door policies and ways for employees to also be anonymous in reporting issues has helped.

5. How are you remediating any non-compliance to human rights policies or addressing identified human rights risks?

First of all, every complaint or issue has to be taken seriously and investigated to the fullest. Once investigations are completed, if any individuals are identified as being in violation of corporate policy, the HR department will take appropriate action in correcting the issue. Some could even result in discipline up to discharge.

6. Do you believe that you are making progress in minimizing human rights risks? What additional support do you believe is necessary in order to making continuous improvement towards upholding human rights?

We believe at Ohio Assembly that we have created a culture that has empowered our workforce to minimize or eliminate human rights risks. Even though our culture is strong, we will continue to find ways and listen to further protect those rights.

### ***Working Conditions***

1. Please describe how you meet each of the facets of “Basic Working Conditions” as outlined in the Code of Human Rights, Basic Working Conditions, and Corporate Responsibility. Use the following chart to outline: i) the policy / law(s) followed in order to meet these principles of “Basic Working Conditions” as outlined in Policy Letter 24, ii) the process your facility undertakes in order to implement such policy / law correctly, and, iii) where these documents are housed.

	Policy(s) / Law(s) Followed	Process to Implement Policy Correctly
<b>Child Labor</b>	<ul style="list-style-type: none"> <li>Fair Labor Standards Act</li> </ul>	<ul style="list-style-type: none"> <li>Plant does not employ candidates who are least reached the age of 18.</li> </ul>

	Policy(s) / Law(s) Followed	Process to Implement Policy Correctly
<b>Compensation</b>	<ul style="list-style-type: none"> <li>• Fair Labor Standards Act</li> <li>• Collective Bargaining Agreement</li> <li>• Overtime Policy</li> <li>• At Will Employment</li> <li>• Time Subject to Compensation Policy</li> </ul>	<ul style="list-style-type: none"> <li>• Salaried employee compensation is developed by the Compensation Office using competitive analysis and a pay for performance philosophy for the annual compensation plan.</li> <li>• Hourly employee compensation is determined through the collective bargaining process and is audited yearly by the Wage Administration Office.</li> <li>• Exempt/Non Exempt status is determined by our HR Org and the Office of the General Counsel.</li> <li>• Employees sign an at Will acknowledgement upon hire.</li> <li>• FLSA training required for all Salary employees</li> </ul>
<b>Forced Labor</b>	<ul style="list-style-type: none"> <li>• Fair Labor Standards Act</li> <li>• At Will Employment</li> </ul>	<ul style="list-style-type: none"> <li>• Forced labor is prohibited. All hours worked by hourly employees are captured in the Workforce One system and posted for employee review for accuracy and salaried employees capture hours worked in Timekeeping.</li> <li>• Ford is an at will employer; employees can leave the company at any time for any reason.</li> </ul>
<b>Freedom of Association and Collective Bargaining</b>	<ul style="list-style-type: none"> <li>• National Labor Relations Act</li> <li>• UAW Collective Bargaining Agreement</li> </ul>	<ul style="list-style-type: none"> <li>• Employees have the right to participate in union member activities as provided by the National Labor Relations Act and governed by the National Labor Relations Board (NLRB).</li> <li>• Joint forums are in place between the Company and Union to foster a respected relationship</li> <li>• Hourly employees are offered representation but can choose to waive</li> </ul>

	Policy(s) / Law(s) Followed	Process to Implement Policy Correctly
<b>Harassment and Discrimination</b>	<ul style="list-style-type: none"> <li>Company Directive B-110: Anti-Harassment</li> <li>Equal Employment Opportunity Act</li> </ul>	<ul style="list-style-type: none"> <li>OHAP has a Zero Tolerance Policy that is enforced. All complaints are investigated appropriately.</li> <li>All new employees are required to participate in Diversity Training and sign a copy of the company's Zero Tolerance Policy brochure.</li> <li>Yearly refresher training modules on sexual harassment are conducted</li> <li>Complaints can be directed to Labor Relations, the Personnel Relations Hotline for investigation or escalated to the Equal Employment Opportunity Commission (EEOC) or Ohio Department of Human Rights for investigation</li> </ul>
<b>Health and Safety</b>	<ul style="list-style-type: none"> <li>Occupation Health and Safety Administration Guidelines</li> <li>Safety Operating System (SOS)</li> <li>UAW-Ford Health &amp; Safety Program</li> </ul>	<ul style="list-style-type: none"> <li>Daily morning review of all SOS injuries and recordable.</li> <li>Monthly Safety Process Review Board – Attended by Management and UAW</li> <li>All Health and Safety processes are governed by the SOS process. Shop floor level, Plant and Executive reviews take place on a regular basis.</li> <li>SOS audit completed by Ford/UAW NJCHS</li> <li>Safety Process Review Board joint forum held on monthly basis.</li> </ul>
<b>Work Hours</b>	<ul style="list-style-type: none"> <li>Fair Labor Standards Act</li> <li>UAW Collective Bargaining Agreement</li> </ul>	<ul style="list-style-type: none"> <li>Salary work hours and compensation are determined by the FLSA.</li> <li>Hourly work hours and shift hours are negotiated in the collective bargaining process.</li> </ul>
<b>Where are these documents housed?</b>		
<ul style="list-style-type: none"> <li>Employee related details are maintained on personnel files for both salaried and hourly employees. In addition, People Soft retains records of past and present salaried employees and Workforce One retains records of past and present hourly employees.</li> <li>Salaried salary ranges and wage structure is maintained by Compensation and Benefits within the Human Resources structure.</li> <li>Life@Ford contains all policies related to Salary time keeping, overtime, time off, etc.</li> <li>Collective bargaining documents and agreements are maintained by Labor Affairs Hourly wage rates and structure are maintained in the collective bargaining agreements and with the Wage Administration Office of the Labor Affairs Department.</li> <li>Grievance Procedure documents are kept on file with the local Labor Relations Offices.</li> <li>Employee hotline records are maintained by the Personnel Relations and locally in HR</li> <li>Ford Corporate Directives and Policies are stored on the Ford Legal Access SharePoint site</li> <li>OSHA records are maintained by the Ohio Assembly Medical and Safety Department</li> </ul>		

2) In the code, it has been made explicit that Ford seeks to identify, report and address any suspicion of human trafficking in order to adhere to our commitment to ensuring Basic Working Conditions and Human Rights.

a) Within your community, are you aware of or have noticed any human trafficking activity? If so, please describe.

- Ohio Assembly is not aware of any issue of human trafficking activity in this community. There have been no instances reported or observed. We would report any issues immediately to local law enforcement and corporate headquarters if we received any information as such.

b) Are you aware of any suppliers or businesses in which you interact that are suspected of or have been found to engage in activities of human trafficking, directly or indirectly?

- We are not aware of any

c) Are you aware of the Company or any other entity supporting the Company in its recruiting efforts requiring fees or charging costs to job-seekers and workers related to recruitment for temporary or permanent job placement at the Company, including when the Company uses the services of Private Recruitment, Labor Broker or Employment Agent or performs recruitment activities directly?

- We are not aware

d) Are you aware of the Company or any other entity supporting the Company in its recruiting efforts retaining or confiscating identity or other documents?

- We are not aware

### ***Corporate Responsibility***

1. Please describe how you meet each of the facets of "Corporate Responsibility" as outlined in the Code of Human Rights, Basic Working Conditions, and Corporate Responsibility. Use the following chart to outline: i) the policy / law(s) followed in order to meet these principles of "Corporate Responsibility" as outlined in Policy Letter 24, ii) the process your facility undertakes in order to implement such policy / law correctly, and, iii) where these documents are housed.

	<b>Policy(s) / Law(s) Followed</b>	<b>Process to Implement Policy Correctly</b>
<b>Community Engagement and Indigenous Populations</b>	<ul style="list-style-type: none"><li>• Ford Corporate Responsibility Policy</li><li>• Policy Letter 13: Governmental Relationships and Civic Affairs</li></ul>	<ul style="list-style-type: none"><li>• Ford Global Week of Caring</li><li>• Company Sponsors United Way Campaign</li><li>• Ohio Assembly participates in Cloth a Child, Giving Tree, Harvest for Hunger and Feed the Needy and the Wounded Warrior Project</li><li>• 16 Hours Paid Community Service Annually to Salary Employees</li></ul>
<b>Bribery and Corruption</b>	Policy Letter 3: Standards of Corporate Conduct	<ul style="list-style-type: none"><li>• Annual recertification of the Anti-Bribery Training</li><li>• Annual recertification of Standards of Corporate Conduct Training</li></ul>

	Policy(s) / Law(s) Followed	Process to Implement Policy Correctly
<b>Environment and Sustainability</b>	Policy Letter 17: Protecting Health and the Environment	<ul style="list-style-type: none"> <li>The Environmental Operating System has specific annual targets and measurables to ensure continuous improvement in environmental initiatives.</li> <li>Plant Environment metrics are on plant scorecard and reviewed monthly.</li> <li>Ohio has reduced both water and electricity consumption year over year. Plant recently underwent plant wide LED lighting and energy projects with Siemens to reduce consumption.</li> </ul>
<b>Where are these documents housed?</b>		
<ul style="list-style-type: none"> <li>Environmental records are retained in the office of the Plant's Environmental Engineer and Corporate office.</li> <li>Community Outreach Programs and Donation contribution are stored in the local HR Office</li> <li>Training Records are kept in Saba under the control of the plants Training and Development Lead</li> </ul>		

2. What local communities or populations do you regularly engage with? What issues are pertinent to them in relation to Ford's projects and activities? What is your process to address issues pertinent to such local communities and populations?

The community is economically diverse and considers Ford a valued employer. Ford Motor Company is the largest employer in Lorain County and is visited often by community leaders. OHAP actively participates in fundraising events for charities such as Feed the Needy, March of Dimes, Giving Tree, Clothe a Child, United Way and Juvenile Diabetes Research Foundation. Salaried employees are encouraged to use their 16 hours of paid community service each year to benefit the members of the community.

3. How have you incorporated sustainable water strategies in to your facility's operations? Can you point to any specific metrics / improvements that have been made and can be quantified? If so, please describe or provide any relevant documentation that indicates progress. *Please contact the Manager, Social Sustainability, if unfamiliar with Ford's water strategy and related initiatives to receive additional information.*

Ohio Assembly is always looking for ways to incorporate new sustainable water projects into our business. We have installed non-flushing urinals in restroom to avoid constant flushing and water waste. We have also installed Nalco industrial water savers on our cooling towers and do counter current flow in the Paint department.

Also, there are Maintenance PM's that review all process valves to ensure water leaks are discovered and repaired in a timely manner. When not scheduled, the plant will assign a Plumber –Pipefitter on each shift to conduct reviews of systems.

4. In your opinion, how do you believe sustainable water projects contribute to the health of staff, operations and the community?

By continuing to look for ways to implement water reduction projects or equipment, the plant is able to reduce our dependence on city water as this helps to reduce the overall cost to the facility and community. We at OHAP are committed to reducing all consumption, not just water.

5. What initiatives are being undertaken to reduce environmental / health impacts from operations? How is this contributing to your facility's ability to move towards being more environmentally sustainable in the long-term?

Each facility has plant specific targets in waste generation, water usage, oil reduction and energy consumption to support the global sustainability strategy. Working together with corporate and our suppliers, Ohio Assembly is always looking for new technology or products that will reduce or eliminate energy usage, hazardous chemicals, water usage, and air emissions.

### **Responsibility for and Implementation of the Code**

1. How are you approaching continuous improvement in your facility's performance, practices and processes in place to comply with Policy Letter 24?

As part of the manufacturing organization within Ford Motor Company, Ohio is continuously involved in evaluating continuous improvement in many aspects of our operations, including human rights. Ohio has several forums, including a joint Ford/UAW continuous improvement forum to discuss all issues of operations including human rights and safety. Ohio will continue to participate in employee surveys, corporate audits, and mutual growth forums to identify areas for improvement and develop action plans to continue to improve all aspects of our operation, including human rights.

### **Additional Information**

1. What would you suggest is most important for Social Sustainability to keep in mind in order to make this effort successful (both in terms of gathering information and creating a sense of partnership and shared purpose with the facilities)?

Hold forums and teach employees about human rights and Policy Letter 24. Employee engagement and showing your commitment as a plant is the only way to continue to drive change.

2. Any words of wisdom/advice?

As a global manufacturer, we need to communicate as well as effectively demonstrate the tenants of Policy Letter 24 in all of our facilities. If you have not participated in this assessment, you might not be familiar with it.