



Supplier Code of Conduct

For Third Parties Supporting Ford Motor Company

Introduction

Ford Motor Company is committed to driving human progress.

We strive to increase access to transportation, protect our environment, enhance the health and well-being of the communities that surround us, and respect the rights of the people who live there. We're helping build a better world, where every person is free to move and pursue their dreams. Our commitment to achieve positive outcomes and respect human rights is embodied in our [*We Are Committed to Protecting Human Rights and the Environment*](#) policy, and in everything we do.

We are committed to respecting the United Nations (UN) Guiding Principles on Business and Human Rights and align our due diligence processes with them. As a member of the UN Global Compact and signatory to the UN Sustainability Development Goals (SDGs), we expect suppliers to help us fulfill our commitment to maintaining a responsible, eco-friendly, and transparent company and supply chain and to extend these commitments to their own supply chain.

Introduction

The Purpose of This Supplier Code

Ford's *We Are Committed to Protecting Human Rights and the Environment* policy establishes how we conduct our business regarding human rights and the environment, including with our suppliers and business partners. Accordingly, this Supplier Code of Conduct ("Code") outlines both our requirements and our expectations for supplier relationships in areas related to human rights, the environment, responsible material sourcing, responsible and lawful business practices, and the associated implementation of these principles.

This Code applies to each member of Ford's supplier community. Ford's requirements and expectations reflect applicable laws, widely accepted international human rights frameworks and charters, and Ford's own internal policies and procedures. We require suppliers to follow all applicable Ford policies and comply with or exceed all applicable laws and regulations.

Supplier Obligations

Every Ford Motor Company supplier must:

- Know and follow this Code.
- Report and remediate any non-compliance and, when issues are identified, transparently report their remediation progress.
- Demonstrate appropriate internal controls upon Ford's request.
- Enforce a similar code of practice and require that subcontractors do the same.
- Identify and use subcontractors who adhere to the requirements of this Code and monitor subcontractor compliance.

For more detailed information, please see the implementation section at the end of this Code.

Protect and Respect Human Rights

We treat our workforce fairly, humanely, and with respect and dignity — and we expect our suppliers to do the same.

OUR SUPPLIERS:

Do not use child labor in any form. Our suppliers must:

- Meet the minimum working age in any region where they operate while prohibiting employment of anyone below the age of 15, even if permitted under local law. Government-authorized job training or apprenticeship programs that clearly benefit the participants are the only exceptions to this requirement.
- Prohibit workers under the age of 18 from performing work that could jeopardize their health or safety, including night shifts, overtime, or hazardous work.
- Properly manage student workers by performing rigorous due diligence on educational partners, keeping appropriate student work records, and protecting student workers' rights.

Neither use nor condone forced or compulsory labor in any form and do not employ any form of abusive disciplinary practices. In addition, we strictly prohibit our suppliers from both using and supporting human trafficking. Our suppliers must:

- Confirm that work is conducted on a voluntary basis. Employees should be free to terminate employment by giving reasonable notice per their contract.
- Prohibit the use of bonded, indentured, or exploitive prison labor.
- Not engage in activities intended to restrict worker freedom of movement.
- Not allow physically or psychologically cruel, inhuman, or degrading treatment.

Protect and Respect Human Rights

OUR SUPPLIERS:

Follow ethical recruiting practices. Our suppliers must not:

- Mislead or defraud potential workers about the nature of the work.
- Ask employees to pay recruitment fees.
- Confiscate, destroy, conceal, and/or deny access to employee passports and other government-issued identity documents.

Recognize and respect employees' rights to freedom of association and collective bargaining. Our suppliers are expected to:

- Work with recognized employee representatives to promote the interests of employees.
- Provide opportunities, even where there is no representation by unions, for employee and external stakeholder concerns to be heard without fear of intimidation, harassment, retaliation, or violence.

Comply with applicable laws regulating hours of work including overtime, where applicable, and provide fair and competitive compensation and benefits that meet or exceed legal requirements.

Our suppliers must:

- Guarantee that all overtime is voluntary and ensure that work schedules and overtime are provided consistent with all applicable laws, including maximum hour and rest period laws.
- Agree upon overtime in advance and, where applicable, compensate overtime at a rate greater than regular hourly rates — or agree in advance to time off in lieu of a higher hourly rate.

Protect and Respect Human Rights

OUR SUPPLIERS:

Do not tolerate harassment or discrimination of any kind. Our suppliers:

- Must not allow harassment or discrimination based upon race, color, religion, age, gender, sexual orientation, gender identity, national origin, disability, veteran status, genetic information, pregnancy, or other factors that may be covered by local law.
- Shall support diversity, promote gender equity, and base employment relationships on the principles of equal opportunity.

Provide a healthy and safe working environment. Our suppliers are required to:

- Provide a working environment that meets or exceeds local and national safety, occupational health, and fire safety legislation.
- Perform regular risk assessments and put in place corrective and preventative measures to minimize workplace hazards including, but not limited to mechanical, electrical, chemical, fire, and physical hazards.
- Provide regular health and safety training to workers and provide Personal Protective Equipment (PPE) at no cost to workers.
- Implement an effective fire safety management system and emergency plan at every supplier worksite. Safeguard employees and others by providing an appropriate number of clearly marked and unobstructed emergency exits and evacuation routes and provide first aid material and medical assistance/procedures to workers.
- Provide workers with clean toilet facilities, potable water, and sanitary eating facilities. Keep worker dormitories clean and safe, with appropriate emergency exits and reasonable entry and exit privileges.
- Encourage workers to openly raise health and safety concerns and provide safeguards against retaliation.

In addition, Ford expects its suppliers to maintain a health and safety management system to limit worker exposure to hazards and promote continuous improvement of working conditions and occupational health and safety.

Protect the Environment

We believe that access to a healthy and clean environment is a basic human right, and we are committed to preserving the environment for present and future generations. Suppliers play a critical role in helping us reduce our collective environmental footprint and in supporting environmental responsibility throughout their operations.

OUR SUPPLIERS:

Comply with or exceed Ford's environmental requirements and policies, including all relevant national, regional, environmental, and chemical legislation. All Tier 1 manufacturing, assembly, and Ford Customer Service Division suppliers must:

- Maintain an environmental management system certified to ISO 14001 through an accredited third-party registrar.

Minimize their impact on climate change aligned with the United Nations Framework Convention on Climate Change (Paris Climate Agreement), striving towards carbon neutrality. Our suppliers are required to:

- Report their Scope 1, 2, and 3 emissions and water usage data to Ford if requested.
- Establish science-based GHG reduction targets, action plans, and transparent reporting mechanisms.

Protect the Environment

OUR SUPPLIERS:

Use recycled and renewable materials including in packaging, reduce substances of concern (including hazardous materials), and improve recyclability of Ford products through material selection and product design as approved by Ford.

Achieve continual environmental improvement in manufacturing operations by reducing emissions, increasing energy efficiency, and utilizing renewable energy.

Mimic ecosystem performance, eliminate waste, divert waste from landfill to products, reduce single use plastic, and, in alignment with the United Nations CEO Water Mandate, reduce freshwater usage and support safe and accessible drinking water in their manufacturing operations and communities. Our suppliers must:

- Utilize materials with reduced toxicity in their manufacturing processes.

In addition, Ford expects its suppliers to improve environmental performance by setting targets and monitoring environmental performance indicators.

Responsibly Source Materials

Ford aspires to source only raw materials that are responsibly produced. Suppliers are required to fully support and cooperate with Ford's efforts to secure full transparency and traceability of their raw materials supply chain and must engage sub-tier suppliers in their efforts to demonstrate transparency.

OUR SUPPLIERS:

Conduct due diligence and increase transparency related to raw materials, including materials sourced from conflict-affected or high-risk areas (CAHRAs). Raw material due diligence serves as an extension of Ford's due diligence implementation requirements. Our suppliers must:

- Identify risks and take appropriate measures to minimize such risks, including risks related to the direct or indirect financing of armed conflict, serious violations of human rights such as child labor, forced labor and slavery, unethical business conduct, or environmental damage.

Provide information upon request to verify the materials in the products supplied to Ford have been sourced responsibly in accordance with Ford's *Responsible Materials Sourcing Policy*.

May be requested to participate in specific initiatives or provide various items in support of our responsible sourcing policy and efforts if they provide products that contain relevant materials such as conflict minerals, cobalt, mica, rubber, or any other materials that Ford deems appropriate.

Maintain Responsible Business Practices

We expect suppliers to conduct business lawfully, honestly, and responsibly, in line with Ford's own internal and external commitments.

OUR SUPPLIERS:

Do business free from bribery and corruption. Our suppliers are required to:

- Exercise caution with government officials, avoiding actions that could appear improper and raise bribery concerns.
- Accurately record business expenditures, never concealing the true nature of an expense.

Maintain effective privacy and cyber security practices. Our suppliers must:

- Act in a transparent and ethical manner regarding the use of Personally Identifiable Information (PII), Ford intellectual property (IP), and private data.
- Use PII in a manner consistent with reasonable expectations and in compliance with applicable laws and regulations.
- Properly manage and safeguard your computing environment using appropriate technical and organizational data security controls.
- Report all cyber security incidents affecting your computing environment within 24 hours of knowing about the incident to: CIRT@ford.com.

Maintain Responsible Business Practices

OUR SUPPLIERS:

Comply with all U.S. and other applicable trade controls with regard to products and services provided to Ford. Our suppliers must:

- Not engage in direct or indirect commercial activity with sanctioned countries, territories, entities, persons, or sectors.
- Conduct appropriate due diligence to comply with sanctions, export controls, and anti-boycott requirements.

Comply with all applicable customs regulations. Our suppliers must:

- Adhere to requirements within Ford's Supplier Guides and business rules for customs processes.
- Maintain accurate and complete records related to customs activities.

How to Implement this Code

All Ford suppliers must comply with this Code, striving to prevent, mitigate, and remediate issues, and demonstrate compliance when asked.

Our goal is to develop a stronger, more sustainable supply base. In the event that a supplier fails to comply with this Code, we reserve the right to seek alternate sources of supply.

OUR SUPPLIERS:

Operationalize and document compliance. We expect our suppliers to:

- Designate a senior executive who is responsible for oversight, governance, implementation, and compliance with this Code.
- If requested, complete questionnaires or participate in on-site assessments or audits conducted by an independent third party.

How to Implement this Code

OUR SUPPLIERS:

Conduct human rights and sustainability due diligence to prevent and mitigate issues. We expect our suppliers to:

- Consult with external experts, relevant stakeholders, and potentially affected groups to identify and assess actual or potential impacts.
- Integrate due diligence findings in business planning and decision making, considering the environment, human rights, public health, indigenous populations, and the communities where they operate.
- Set sustainability goals, accurately track results, and continually evaluate and report progress.
- Provide timely and accurate information to our various stakeholders on social and environmental matters involving Ford.
- Engage constructively with suppliers, local communities, governments, non-governmental organizations, and other stakeholders, including indigenous people regarding the matters covered in this Code.
- Seek third party assistance, as appropriate, to assess compliance with this Code.

Provide grievance mechanisms and remedies. We expect our suppliers to:

- Provide operational-level grievance mechanisms that are accessible to employees, suppliers, and the public.
- Provide appropriate remedies when non-compliance occurs.
- Not retaliate against anyone who makes a good faith report of a violation of policy or law.

Report suspected wrongdoing and concerns — including concerns about product safety. We require our suppliers to report any issues via email to SpeakUp@ford.com.

Ford will not tolerate any retaliation against its suppliers for bona fide reports of unethical or unlawful conduct by our employees or representatives.

Ford may ask for confirmation of compliance with the requirements of this Code at any point in its relationship with a supplier, including before business is awarded. Any corrective action plans required to demonstrate or rectify non-conformance to this Code will be according to a mutually agreed timeline and at no cost to Ford.

References

International Framework and Charters and Industry Guidance

- [International Bill of Human Rights \(The United Nations Universal Declaration of Human Rights and its two Covenants\) 1948](#)
- [International Labour Organisation \(ILO\) Declaration on Fundamental Principles and Rights at Work \(1998\)](#)
- [United Nations \(UN\) Guiding Principles on Business and Human Rights \(2011\)](#)
- [Organisation for Economic Co-operation and Development \(OECD\) Guidelines for Multinational Enterprises \(2011 Edition\)](#)
- [OECD Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas \(2016 Edition\)](#)
- [UN CEO Water Mandate](#)
- [UN Women's Empowerment Principles \(2010\)](#)
- [Automotive Industry Guiding Principles \(2017\)](#)

Ford Internal Policies

- [Ford Code of Conduct Handbook](#)
- [We Are Committed to Protecting Human Rights and the Environment](#) policy
- [Responsible Materials Sourcing Policy](#)