

Ford Supplier Code of Conduct



Ford Motor Company is driven by our purpose to help build a better world where every person is free to move and pursue their dreams.

That's why we work to ensure that everything we make and do – or that others make or do for us – achieves the highest standards for ethics and business conduct, including the highest standards of sustainability to protect the environment, enhance the health and well-being of the communities that surround us and to respect human rights.

The Purpose of This Supplier Code.

Guided by our Ford policies on responsible and lawful business practices, including [We Are Committed to Protecting Human Rights and the Environment](#) policy, and the United Nations (UN) Guiding Principles on Business and Human Rights (UNGPs), Ford's Supplier Code of Conduct ("Code") outlines Ford's requirements and expectations for supplier relationships in areas related to human rights, the environment and responsible materials sourcing.

This Code applies to each member of Ford's supplier community. While we explicitly require suppliers to follow all applicable Ford policies and to comply with or exceed all applicable current and impending laws and regulations, our Code also aligns with widely accepted international human rights frameworks and charters. Suppliers are obligated to extend these requirements to their own suppliers and supply chains.

Our goal is to develop a stronger, ethical, and sustainable supply base. While we reserve the right to seek alternate sources of supply if a supplier fails to comply with this Code, we can also follow UNGP 19 and elect to continue to work within a business relationship if we have the leverage to impact their compliance with our environmental, social and governance requirements. This practice allows Ford to use our purchasing power to develop and monitor progress toward corrective action and create better outcomes for people and groups who may be impacted by a supplier's actions.

Supplier Obligations.

Every Ford Motor Company Supplier Must:

- Know and follow this Code and all applicable laws, aligning company policies to reflect these requirements.
- Enforce a corresponding code of practice and require that subcontractors and suppliers do the same.
- Identify and use subcontractors and suppliers who adhere to legal and regulatory requirements, including this Code, and monitor their compliance.
- Report and remediate any non-compliance; and, when issues are identified, transparently report their remediation progress.
- Share sub-tier supply chain information upon request, and as required by Ford's Value Chain Transparency Supplier Guide.
- Operationalize and document compliance through the establishment of an appropriate risk management system, including a risk analysis process.
- Demonstrate appropriate internal controls upon Ford's request or partake in such upon Ford's request.

For more detailed information, please see the "How To Implement" section at the end of this Code.

Protect and Respect Human Rights

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Ford is committed to respecting human rights in everything we do. It's a core part of our purpose to help build a better world where all are free to move and pursue their dreams.

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.

We Require Our Suppliers To:

- 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.
- Responsibly manage student workers by performing rigorous due diligence on educational partners, keeping appropriate student work records, and protecting student workers' rights.
- Prohibit workers under the age of 18 from performing work that could jeopardize their health or safety, including night shifts, overtime, or hazardous work in compliance with ILO Worst Forms of Child Labour Convention (No. 182).
- Implement an appropriate mechanism to verify that the age of workers complies with the ILO Minimum Age Convention (No. 138) and provide substantiation of this verification mechanism upon request.
- Ensure that all recruitment efforts for workers, including recruitment performed by third party contractors, includes mechanisms or verify that the age of potential applicants complies with the ILO Minimum Age Convention (No. 138).
- Cease employment of the child/children and take reasonable measures to enroll the child/children in a remediation/education program if child labor is discovered in its own facilities or in their supply chain.

Our Suppliers

Do not use nor condone forced labor, compulsory labor, or slavery 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.

We Require Our Suppliers To:

- Confirm that work is conducted on a voluntary basis. Employees should be free to terminate employment without penalty by giving reasonable notice per their contract, if any, and in accordance with applicable laws.
- 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.

Follow ethical recruiting practices.

We Prohibit Our Suppliers From:

- Misleading or defrauding potential workers about the nature of the work.
- Asking employees to pay recruitment fees; or pay off a loan by working for an agreed-upon or unclear period of time for little or no salary, with the work performed greatly exceeding the worth of the initial loan including employers’ agent and sub-agents. In case any such fees are found to have been paid by workers such fees shall be repaid to the worker.
- Confiscating, destroying, concealing, and/or denying access to employee passports and other government-issued identity documents.

Recognize and respect employees’ rights to freedom of association and collective bargaining.

We Require Our Suppliers To:

- Work with recognized employee representatives to promote the interests of employees.
- Not discriminate or retaliate against any employees, including respecting the right of all workers to form and join trade unions of their own choosing and to refrain from such activities.
- Provide opportunities for employees and external stakeholders concerns to be heard, even where there is no representation by unions.

Comply with applicable laws regulating hours of work including overtime, and support a living wage by providing competitive compensation and benefits that meet or exceed legal requirements.

We Require Our Suppliers To:

- Ensure that work schedules and overtime are provided in a manner 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, where permitted by law, agree in advance to time off in lieu of a higher hourly rate.

Our Suppliers

Do not tolerate harassment or discrimination of any kind.

We Require Our Suppliers To:

- Not allow harassment or discrimination based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected generic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.
- Promote inclusion, and base employment relationships on the principles of equal opportunity
- Not hire or use private or public security forces for protection of the company’s projects without proper supervision and due diligence in adherence with this policy.
- Clearly define and communicate disciplinary policies and procedures in support of the requirements to workers.

Respect Land Rights.

We Require Our Suppliers To:

- Respect the rights of Indigenous Peoples in accordance with the United Nations Declaration on the Rights of Indigenous Peoples.
- Not engage in any acts constituting or aiding unlawful eviction or unlawful taking of land, forests, or waters securing the livelihood of human beings.
- Strive to ensure Free, Prior and Informed Consent of communities is pursued and obtained prior to project or activities that may affect their lands, resources and rights.

Provide a healthy and safe working environment.

We Require Our Suppliers To:

- Provide a working environment that meets or exceeds prevailing industry standards and local, regional, and national safety, occupational health, and fire safety regulations.
- 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.
- Provide required rest breaks to prevent excessive physical and mental fatigue.
- Provide Personal Protective Equipment (PPE) at no cost to workers.
- Implement an effective fire safety management system and emergency plan at every supplier worksite that safeguards 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



Ford is committed to protecting the environment and respecting human rights, including the right to clean air and water. We support the protection of local communities from environmental and health hazards and providing meaningful involvement in our decision-making processes.

Suppliers play a critical role in helping reduce greenhouse gas and other emissions that contribute to climate change, air and water pollution. We require our suppliers to identify and minimize potential environmental risks and remediate violations when they occur.

Suppliers strive for positive impacts by improving environmental performance by setting targets and monitoring environmental performance indicators.

Our Suppliers

Comply with or exceed Ford's environmental requirements and policies, including all relevant national, regional, environmental, and chemical legislation (in particular those noted in References).

We Require Our Suppliers To:

- Maintain an environmental management system certified to ISO14001 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.

We Require Our Suppliers To:

- Report their Scope 1, 2, and 3 emissions and water usage data to Ford if requested.
- Establish science-based Greenhouse Gas (GHG) reduction targets, comprehensive action plans, and transparent reporting mechanisms across all scopes to achieve global Carbon Neutrality by 2050, supported by specific near-term targets and implementation strategies for 2030.

Our Suppliers

Reduce, Reuse, Recycle materials in manufacturing.

We Require Our Suppliers To:

- Use recycled and renewable materials where possible in packaging.
- Improve recyclability of Ford products through material selection and product design as approved by Ford.
- Eliminate waste.
- Divert waste from landfill to products.
- Work to eliminate single use plastics throughout the manufacturing process.

Ford does not use animals for testing nor do we ask or fund others to do that for us. Our Suppliers do not use animals for testing nor require sub-contractors to do so, as aligned with Drive Sustainability and AIAG Automotive Industry Guiding Principles to Enhance Sustainability Performance in the Supply Chain.

We Expect Our Suppliers To:

- Respect the five animal freedoms formalized by the World Organization for Animal Health (OIE) concerning animal welfare.
- Not raise or kill any animals for the single purpose of being used in an automotive product.

Achieve continual environmental improvement in manufacturing operations.

We Require Our Suppliers To:

- Reduce and/or substitute substances of concern and work to phase out substances of very high concern (including toxic compounds and hazardous waste).
- Avoid incidents and emergency situations by taking proactive measures and be prepared for emergencies in order to limit the impact on people and the environment.
- Utilize materials with reduced toxicity in their manufacturing processes.
- Reduce emissions annually.
- Increase energy efficiency, renewable energy, and use carbon-free electricity.
- In alignment with the United Nations CEO Water Mandate, support access to clean and safe drinking water in local communities.
- Set water reduction targets and reduce freshwater usage in their own operations and along the upstream and downstream value chain, prioritizing but not limited to water stress areas.
- Ensure their supply chains are deforestation-free in accordance with the EU Deforestation Regulation and to comply with all applicable biodiversity and similar regulations, as the case may be. This includes, upon request, providing precise traceability data and comprehensive due diligence records for regulatory statements.
- Refrain from causing any harmful soil change.
- Refrain from excessive noise emissions.

Responsibly Source Materials



Ford aspires to source only raw materials that are responsibly produced. Ford considers responsibly produced materials to come from material processors and mines that have been third-party audited to a responsible sourcing standard. Suppliers should refrain from including sub-tier suppliers who have not undergone or are not actively seeking to undergo an acceptable responsible sourcing audit.

Suppliers are required to engage sub-tier suppliers to fully support and cooperate with Ford's efforts to secure full transparency and traceability of their raw materials supply chains. Information provided must not misrepresent material supply chains and include all known information as requested.

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.

We Require Our Suppliers To:

- Develop a management system, including an appropriate responsible point of contact, to assess, identify and mitigate risks in material supply chains.
- Enable appropriate measures to minimize 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.

We Require Our Suppliers To: (continued)

- Encourage suppliers securing minerals to source from processors assessed against a third-party ESG standard, such as the Responsible Minerals Initiative’s (RMI) Facility Standard for Social, Environmental, OHS and Governance Risks.
- Secure critical raw minerals from material processors that are certified through a third-party responsible sourcing standard such the Responsible Minerals Initiative’s (RMI) Responsible Minerals Assurance Process (RMAP).
- Ensure these requirements are communicated to sub-suppliers and/or directly to identified smelters/refiners/processors who are not RMAP certified.
- Obtain the Free, Prior, and Informed Consent (FPIC) of Indigenous Communities when securing raw materials prior to projects or activities that may affect their lands, resources, rights and engage directly with the representatives and institutions chosen and recognized by the Indigenous communities themselves to ensure meaningful consultation and participation in decision-making processes.
- Participate in initiatives to support responsible material sourcing.

- Upon request, provide information to verify that the materials in the products supplied to Ford have been sourced responsibly in accordance with this code and [Ford’s Responsible Material & Conflict Mineral Policy](#):
 - In-scope materials may include, but are not limited to, conflict minerals (tin, tantalum, tungsten and gold), battery-active materials (cobalt, natural graphite, lithium, nickel, and their related chemical compounds), mica, aluminum, steel, copper, recycled lead, rare earth elements, natural rubber, wood and leather.
 - This may include the disclosure of all sub-tier supplier information and location to enable comprehensive due diligence of sub-tier and raw material supply chain actors for materials used in products supplied to Ford.
 - Ford retains the right to conduct risk-based ESG audits at sub-tiers, where concerns are identified via our due diligence tools. Suppliers are required to support these efforts including active participation in corrective actions.

Raw Material Suppliers must seek third party assurance for responsible sourcing that also addresses ESG due diligence management systems and ESG concerns:

- Mineral processors must conform to the Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP). Additionally, processors must use best efforts to conform to RMI Supply Chain Due Diligence Plus (RMAP+) and implement the RMI Facility Standard for Social, Environmental, OHS and Governance Risks (or an agreed-upon third-party equivalent) and request that their upstream suppliers adopt similar responsible sourcing and ESG standards.
- Mining suppliers are required to seek certification by an independent third-party responsible mining assurance standard, such as the Standard for Responsible Mining from the Initiative for Responsible Mining Assurance (IRMA) or an agreed upon third-party certified equivalent.
- Battery-active material suppliers and their sub-tiers down to the mine (including lithium, nickel, graphite, cobalt, and related chemical compounds) are required to:
 - Participate in approved ESG facility standards (e.g. RMI Facility Standard for Social, Environmental, OHS and Governance Risks) and digital traceability mechanisms;
 - Engage in mitigation efforts, including self-assessments, audits, corrective actions, training and, if applicable remediation;
 - Share the results of these activities with Ford upon request and;
 - Secure raw materials from RMAP+ certified processors and IRMA-assured mines, or agreed-upon equivalents.

Maintain Responsible Business Practices



We require 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.

We Require Our Suppliers To:

- Comply with all anti-bribery and anti-corruption laws and do not participate in or endorse any corrupt practices in whatever form, including offering or accepting bribes, excessive gifts or hospitality or facilitation payments. These obligations are outlined in the [Anti-Corruption Supplement](#).
- Exercise caution with government officials, avoiding actions that could appear improper and/or raise bribery concerns.
- Accurately record business expenditures, never concealing the true nature of an expense.
- Report to Ford if you learn of or have reason to know of any payment, offer or agreement relating to the product or service you are providing to Ford, that is contemplated or that has occurred and that could represent a violation of law.
- Report any suspicious transactions to Ford and be alert for signs of money laundering.
- Fully cooperate with Ford's due diligence processes upon request by promptly providing complete and accurate information and all requested documentation via Ford's online anti-bribery reporting system, as well as promptly responding to any further questions to ensure timely completion of the process.

Maintain effective privacy and cyber security practices.

We Require Our Suppliers To:

- 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.
- Responsibly manage and safeguard their computing environment using appropriate technical and organizational data security controls.
- Report all cyber security incidents affecting their computing environment within 24 hours of knowing about the incident to: cirt@ford.com

Comply with all U.S. and other applicable trade controls regarding products and services provided to Ford.

We Require Our Suppliers To:

- 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.

We Require Our Suppliers To:

- 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, work to prevent issues that are deemed high risk, mitigate and remediate issues when identified, and demonstrate compliance when asked.

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.

Our Suppliers

Operationalize and document compliance.

We Require Our Suppliers To:

- Designate a senior executive who is responsible for oversight, governance, implementation, and compliance with this Code.
- Establish an appropriate compliance risk management system to manage human rights and environment-related risks, responsible material sourcing, and responsible and lawful business practices based on the United Nations Guiding Principles for Businesses and Human Rights.
- Conduct regular employee trainings to educate employees on practices as laid out in this Code. Suppliers must update and improve training at least annually. If the supplier does not have the capacity to develop and maintain this training, Ford can provide access to industry aligned trainings on these topics upon request at: fwcp@ford.com
- Provide documentation on the implementation of such trainings.
- Enable Ford to assess compliance with this Code and that requirements are met by completing questionnaires and/or participating in on-site assessments or audits conducted by an independent third party.
- Document efforts to comply with this Code and keep the documentation for at least 7 years.

Develop and implement human rights, environmental and sustainability due diligence measures to prevent and mitigate issues and to strive for positive impacts.

We Require Our Suppliers To:

- Identify and assess human rights and environment-related compliance risks, respective violations, and actual or potential adverse impacts by consulting external experts and providing meaningful involvement of relevant stakeholders and people or groups potentially affected by the supplier's activities or those of its own suppliers in decision-making processes.

- Integrate due diligence findings in business planning and decision making, considering the environment, human rights, public health, Indigenous Peoples, and the communities where they operate.
- Set environmental, social and governance goals, accurately track results, and continually evaluate and report progress.
- Provide timely and accurate information to stakeholders on environmental, social and governance matters involving Ford.
- Ensure fair treatment of relevant stakeholders and people or groups potentially affected by the supplier's activities or those of its own suppliers, in decision-making processes regardless of race, color, national origin, or income.
- Engage transparently and constructively with suppliers, local communities, governments, non- governmental and advocacy organizations, and other stakeholders, including Indigenous groups, regarding the matters covered in this Code.
- Seek third-party assistance, as appropriate, to assess compliance with this Code.

Provide grievance mechanisms and remedy.

We Require Our Suppliers To:

- Provide an operational-level grievance mechanism which is accessible to all employees, suppliers, and the public.
- Transparently inform stakeholders on their grievance mechanism, including how to access and use.
- To bring the violation or adverse impact to an end; 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 – to Ford at 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.

Suppliers may also utilize and transparently inform stakeholders of human rights and environment-related issues through Ford's [External Grievances](#) system. This grievance mechanism is open and accessible for all suppliers and employees within Ford's supply chain.

References

Aligned with these International Frameworks and Charters and Industry Guidance.

- [International Bill of Human Rights \(The United Nations Universal Declaration of Human Rights and its two Covenants\) \(1948\)](#)
- [ILO Declaration on Fundamental Principles and Rights at Work and its Follow Up \(2022 Edition\)](#)
- [United Nations \(UN\) Guiding Principles on Business and Human Rights \(2011\)](#)
- [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 Global Compact](#)
- [UN Sustainable Development Goals](#)
- [UN CEO Water Mandate](#)
- [UN Women's Empowerment Principles \(2010\)](#)
- [United Nations Declaration on the Rights of Indigenous Peoples \(2007\)](#)
- [Automotive Industry Guiding Principles \(2022\)](#)
- Relevant Supply Chain Due Due Diligence & Responsible Material Reference Laws:
 - [Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains \(2021\)](#)
 - [EU Battery Regulation \(EU\) 2023/1542](#)
 - [EU Deforestation Regulation \(EU\) 2023 / 1115](#)
 - [US Uyghur Forced Labor Prevention Act \(UFLPA\)](#)
 - [EU Corporate Sustainability Due Diligence Directive \(CS3D\)](#)
 - [US Dodd-Frank Act \(conflict minerals\)](#)
 - [EU Critical Raw Materials](#)
- Relevant Environmental Regulations and Laws:
 - [Minamata Convention on Mercury](#) of 10 October 2013, noting in particular:
 - Article 4 (1) – prohibition of the manufacture of mercury-added products listed in Annex A Part I from the phase-out date specified in the Convention for the respective products and processes
 - Article 5 (2) – prohibition of the use of mercury and mercury compounds in specific manufacturing processes listed in Annex B Part I from the phase-out date specified in the Convention for the respective products and processes
 - Article 11 (3) – appropriate measures for management/treatment of mercury waste

- [Stockholm Convention on Persistent Organic Pollutants](#) of 23 May 2001 in the version of Regulation (EU) 2019/1021 and as last amended (2020), noting in particular:
 - Article 3 (1) (a) – prohibition of the production and use of chemicals listed in Annex A
 - Article 6 (1) (d) (i, ii) – prohibition of the handling, collection, storage and disposal of waste in a manner that is not environmentally sound
- [Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal](#) in the version of as last amended (2013)
- [Regulation \(EC\) No 1013/2006](#) on shipments of waste as last amended (2020)

Publicly Available Ford Policies/Resources

- [Corporate Sustainability Reporting Site](#)
- [Code of Conduct](#)
- [We Are Committed to Protecting Human Rights and the Environment](#)
- [Ford Restricted Substances Management Standard](#)
- [Responsible Material & Conflict Mineral Policy](#)

Additional Ford Supplier Guides (requires access to Ford Supplier Portal)

- Environmental Requirements Supplier Guide
- Export Control and Sanctions Compliance Supplier Guide
- Ford Parts Brand Protection Supplier Guide
- North America Customs & Trade Supplier Guide
- Packaging Supplier Guides
- Social Responsibility and Anti-Corruption Requirements Supplier Guide
- Supplier Customs Import & Export Guides for the United States, Mexico and Canada
- Supply Chain Inclusivity and Diversity Supplier Guide
- Value Chain Transparency Supplier Guide

