

**Company Name** Ford  
**Industry** Automobiles  
**Overall Score (\*)** 41.5 out of 100

| Theme Score | Out of | For Theme   |
|-------------|--------|---|
| 4.7         | 10     | A. Governance and Policies                          |
| 15.0        | 25     | B. Embedding Respect and Human Rights Due Diligence |
| 4.6         | 15     | C. Remedies and Grievance Mechanisms                |
| 4.9         | 20     | D. Performance: Company Human Rights Practices      |
| 7.5         | 20     | E. Performance: Responses to Serious Allegations    |
| 4.9         | 10     | F. Transparency                                     |

(\*) While other sectors are being measured against a reduced set of CHRB Core UNGP Indicators this year the Automotive Manufacturing sector is being measured against the full CHRB Methodology as it is the first year that the sector has been analysed.

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

| Indicator Code | Indicator name                     | Score (out of 2) | Explanation  |
|----------------|------------------------------------|------------------|--|
| A.1.1          | Commitment to respect human rights | 1                | <p>The individual elements of the assessment are met or not as follows:<br/>Score 1</p> <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Company states in its Code: 'It is a goal of the Company to respect human rights in all of our activities.' In addition, in its Modern Slavery Statement, it indicates: 'Everything we make – or that others make for us – needs to be consistent with local laws, and our own commitment to protecting and upholding human rights'. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a> &amp; MSA 2019, 24/04/2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>Met: UNGC principles 1 &amp; 2: In its Sustainability Report, the Company indicates: 'Ford is a signatory of the UN Global Compact, a framework of 10 universally accepted principles covering human rights, labor, environment and anti-corruption, and we actively participate in the UNGC's Supply Chain Sustainability Advisory Committee. We incorporate these principles into our policies and procedures'. [Sustainability Report 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> |

| Indicator Code | Indicator name                                    | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                |   |                  | <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: UNGPs: The policy reads: 'The principles are consistent with, and in many instances derived from, the human rights framework and charters listed below: [...] The UN Human Rights Council Guiding Principles on Business and Human Rights (2011)'. However, 'to be consistent with' is not considered a formal commitment following CHRB wording criteria. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Not met: OECD: The policy reads: 'The principles are consistent with, and in many instances derived from, the human rights framework and charters listed below: [...] The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises Revision 2011'. However, 'to be consistent with' is not considered a formal commitment following CHRB wording criteria. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul>  |
| A.1.2          | Commitment to respect the human rights of workers | 1.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: ILO Core: The Company include in its Policy Letter No. 24 provisions related with the ILO Core: 'The Company will not use child labor. [...] The Company will not use forced labor in any form, [...]. The Company recognizes and respects its employees' right to associate freely and bargain collectively. The Company will work constructively with recognized employee representatives to promote the interests of its employees. In locations where employees are not represented by unions, the Company will provide opportunities for employee concerns to be heard. [...] the Company will not tolerate harassment or discrimination [...]'. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Explicitly list ALL four ILO for MO suppliers: The Company 'encourages businesses throughout our supply chain to adopt and enforce similar policies in their own operations that are similar to those articulated here.' As indicated above, the policy includes provision for all ILO Core. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: As indicated above, the Company include in its Policy Letter No. 24 provisions related with the ILO Core: 'The Company will not use child labor. [...] The Company will not use forced labor in any form, [...]. The Company recognizes and respects its employees' right to associate freely and bargain collectively. The Company will work constructively with recognized employee representatives to promote the interests of its employees. In locations where employees are not represented by unions, the Company will provide opportunities for employee concerns to be heard. [...] the Company will not tolerate harassment or discrimination [...]'. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Respect H&amp;S of workers: In addition, the Company states in its Policy Letter No. 24: 'the Company will provide and maintain for all personnel a safe and healthy work environment that meets or exceeds applicable legal standards for occupational safety and health.' [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: H&amp;S applies to MO suppliers: As indicated above, the Company 'encourages businesses throughout our supply chain to adopt and enforce similar policies in their own operations that are similar to those articulated here.' [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Not met: Working hours for workers: Finally, also in its Policy Letter No. 2, the Company states: 'The Company will comply with applicable laws regulating hours of work'. However, no commitment found to international standards or a explicit reference to a regular working week of 48 hours (excluding overtime) and minimum breaks. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Not met: Working hours for MO suppliers: As indicated above, the Company 'encourages businesses throughout our supply chain to adopt and enforce similar policies in their own operations that are similar to those articulated here.' However, the policy does not include a commitment to respect working hours</li> </ul> |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
|                |  |                  | including requirements indicated above. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a> ]   |
| A.1.3.MO.a     | Commitment to responsible sourcing of minerals                                 | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Responsible mineral sourcing in conflict areas: The Company states in its Conflict Mineral Policy: 'To the extent tin, tungsten, tantalum, and gold are contained in our products, it is Ford's goal to use DRC conflict free minerals while continuing to support responsible in-region mineral sourcing from the Democratic Republic of the Congo and adjoining countries. [...] Ford's responsible materials and related due diligence practices address additional materials originating from Conflict-Affected and High-Risk Areas (CAHRAs), as defined by the Organization for Economic Co-operation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, ("OECD Guidance") and the related supplements for 3TG, including cobalt and mica'. [Conflict Mineral Policy, 01/07/2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Based on OECD Guidance: In addition, the Company indicates: 'Our due diligence measures have been designed to conform, in all material respects, with the 5 step framework in the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition, 2016 ("OECD Guidance") and the related supplements for 3TG'. [Conflict Mineral Report 2019, 29/05/2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Requires responsible mineral sourcing from suppliers: The Conflict Mineral Policy reads: 'Our suppliers are required to conduct due diligence to understand the source of the conflict minerals and other requested raw materials used in Ford products, source responsibly, and not knowingly provide products containing minerals that contribute to conflict as described in the Rule'. [Conflict Mineral Policy, 01/07/2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responsible conflict mineral sourcing covers all minerals</li> <li>• Not met: Suppliers expected to make similar requirements of their suppliers</li> </ul> |
| A.1.3.MO.b     | Commitment to respect human rights particularly relevant to the industry (ICT) | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Women's Rights: The Company is signatory of the Women's Empowerment Principles. [Women Empowerment Principles signatories, N/A: <a href="http://weps.org">weps.org</a>]</li> <li>• Not met: Children's Rights</li> <li>• Not met: Migrant worker's rights</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: CEDAW/Women's Empowerment Principles: As indicated above, the Company is signatory of the Women's Empowerment Principles. [Women Empowerment Principles signatories, N/A: <a href="http://weps.org">weps.org</a>]</li> <li>• Not met: Child Rights Convention/Business principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>  |
| A.1.4          | Commitment to engage with stakeholders   | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Regular stakeholder engagement: In its GRI Index, the Company summarizes its Stakeholder Groups and the approach taken for engagement, including: Communities (Community Relations Committees, Dialogue with nongovernmental organizations, etc.), Employees (Employee surveys, Union representatives, Joint labor - management committees, etc.) and Suppliers (Aligned Business Framework supplier dialogue sessions, Supplier quality roundtables, Supplier Diversity Development Networking), among others. [GRI Index 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement: The Company reports: 'Our 10 human rights issues were prioritized from a long list of 23 potential human rights issues relevant to Ford, based on the potential negative impact the issues could have on human rights. We determined these issues in partnership with a third-party consultancy. The assessment included: [...] Interviews with internal representatives from across Ford's global business, including senior management, as well as external stakeholders, including suppliers, an investor representative, NGOs and industry experts, to review and prioritize the identified issues in terms of their potential to generate adverse impacts on populations through Ford's activities</li> </ul>   |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
|                |  |                  | or business relationships, and determine especially vulnerable populations. Online survey distributed to a focused group of global employees to identify top salient issues, vulnerable populations, priority actions for Ford and emerging human rights issues Workshops with internal and external stakeholders to validate and confirm the assessment findings'. However, CHRB no further evidence found, including how regular stakeholder engagement is aimed to design the Company's approach to face human rights issues or to monitor its performance. [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a> ]   |
| A.1.5          | Commitment to remedy                                       | 1                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Met: Commits to remedy: Its Policy Letter No. 24 reads: 'Company personnel should also work to reduce the risk of potential human rights violations by identifying risks, monitoring those risks, remediating any non-compliance, and reporting our progress publicly.' In addition, in its UNGPRF Index, as a response to the question 'How does the company demonstrate the importance it attaches to the implementation of its human rights commitment?', the Company responds: 'We seek to neither cause nor contribute to adverse human rights impacts through our activities and will seek to address and remedy such impacts if and when they occur.' [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="https://corporate.ford.com">corporate.ford.com</a> &amp; UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not met: Not obstructing access to other remedies</li> <li>Not met: Collaborating with other remedy initiatives</li> <li>Not met: Work with MO suppliers to remedy impacts: The Company reports: 'In Taiwan, we found recruitment fees were being charged at a supplier site to migrant employees. These fees are regulated by the government in Taiwan and can be legally charged to migrant workers. This however, is a violation of Ford's GTCs and the supplier was asked to remediate. The supplier reimbursed each worker for the fees charged by both the regional and sending brokers. Our team worked with the supplier to identify policies/procedures to prevent and remediate fees in the future. These policies were adapted by the supplier's global management team and were implemented at other facilities spreading the effect of the corrective action beyond Taiwan'. However, this indicator looks for Company involvement in collaboration with partners' mechanisms or developing third party non-judicial mechanisms. Current evidence seems to focus in requirement of corrective action plans for the suppliers, and work with them afterwards to prevent this situations from happening in the future. [MSA 2019, 24/04/2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> |
| A.1.6          | Commitment to respect the rights of human rights defenders | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Not met: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not met: Expects MO suppliers to reflect company HRD commitments</li> </ul>  |

## A.2 Policy Commitments (5% of Total)

| Indicator Code | Indicator name          | Score (out of 2) | Explanation  |
|----------------|-------------------------|------------------|--|
| A.2.1          | Commitment from the top | 1                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Met: CEO or Board approves policy: The Company's Policy Letter No. 24 is signed by Alan Mulally former President and Chief Executive Officer of the Company. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>Met: Board level oversight for HRs: According the Charter of the Sustainability and Innovation Committee, on of its responsibilities is 'Discuss and advise management on maintaining and improving sustainability strategies, the implementation of which create value consistent with the long-term preservation and enhancement of shareholder value and social well-being, including human rights, working conditions, and responsible sourcing.' [Charter of the Sustainability and Innovation Committee of the Board of Directors, 03/2015: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> |

| Indicator Code | Indicator name                        | Score (out of 2) | Explanation  |
|----------------|---------------------------------------|------------------|--|
|                |                                       |                  | Score 2<br><ul style="list-style-type: none"> <li>Not met: Speeches/letters by Board members or CEO: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. Speeches or letter by CEO have to discuss the Company's approach to its human rights issues or its business importance.</li> </ul>  |
| A.2.2          | Board discussions                     | 2                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Met: Board/Committee review of salient HRs: The Company indicates that its Board Sustainability and Innovation Committee has the 'Primary responsibility for assessing the company's progress on strategic economic, environmental and social issues as well as the degree to which sustainability principles have been integrated into the various skill teams (see the Committee's Charter); Evaluates and advises on innovations and technologies that improve our economic, environmental and social sustainability'. According to the Committee's Charter the sustainability strategies includes 'including human rights, working conditions, and responsible sourcing'. In addition, in its UNGPRF Index 2020, it states: 'Human rights issues are monitored throughout the year and brought to the attention of the Sustainability and Innovation Committee of the Board of Directors for review and oversight as they arise. We have a Corporate meeting structure to improve how we operate the business today and prepare us for the future, framing how we think, inspect, decide and learn'. [Sustainability Report 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a> &amp; Charter of the Sustainability and Innovation Committee of the Board of Directors, 03/2015: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>Met: Examples or trends re HR discussion: The Company reports in its UNGPRF Index: 'So far in 2019/20, the Sustainability and Innovation Committee of the Board of Directors has reviewed Ford's Supply Chain Sustainability program, including an update on human rights related to the sourcing of conflict minerals. The Committee has reviewed the Sustainability Report Summary 2020. Other key topics are reviewed as and when they arise'. [UNGPRF Index SR 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Met: Both examples and process</li> </ul> |
| A.2.3          | Incentives and performance management | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Not met: Incentives for at least one board member</li> <li>Not met: At least one key MO HR risk, beyond employee H&amp;S</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not met: Performance criteria made public</li> </ul>   |

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
| B.1.1          | Responsibility and resources for day-to-day human rights functions | 1.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Met: Commits to ILO core conventions</li> <li>Met: Senior responsibility for HR: The code of Human rights states that 'The Vice President, Sustainability, Environment and Safety Engineering is responsible for interpreting this Policy with the concurrence, as appropriate, of the Executive Vice President, Global Manufacturing and Labor Affairs, the Group Vice President, Global Purchasing, and the Group Vice President and General Counsel'. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Met: Day-to-day responsibility: With respect day-to-day responsibilities, the Company indicates that the 'Sustainability and Vehicle Environmental Matters': Coordinates our companywide sustainability strategy and activities; Leads our sustainability reporting and stakeholder engagement; Collaborates with other functional areas and skill teams to integrate sustainability throughout the company.' [Sustainability Report 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>Not met: Day-to-day responsibility for MO in supply chain</li> </ul> |
| B.1.2          | Incentives and performance management                              | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Not met: Senior manager incentives for human rights</li> <li>Not met: At least one key MO HR risk, beyond employee H&amp;S</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not met: Performance criteria made public</li> </ul>   |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
| B.1.3          | Integration with enterprise risk management  | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Not met: HR risks is integrated as part of enterprise risk system</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not met: Audit Ctte or independent risk assessment</li> </ul>   |
| B.1.4.a        | Communication /dissemination of policy commitment(s) within Company's own operations | 1                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Met: Commits to ILO core conventions</li> <li>Met: Communicates its policy to all workers in own operations: The Company states in its Sustainability Report: 'Our Policy Letters and Directives formally set out the expectations we have for our employees and others working on our behalf. The most important of these are contained within our Code of Conduct Handbook, available to employees in 14 languages. These expectations are reinforced in mandatory online training courses, which are periodically refreshed and reviewed to ensure the content remains relevant and appropriate'. In addition, it indicates in its UNGPRF Index: 'These [Policy &amp; Directives] expectations are reinforced in mandatory online training courses, which are periodically refreshed and reviewed to ensure the content remains relevant and appropriate. As an example, all of our global employees will complete harassment and discrimination training by the end of 2020'. [Sustainability Report 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a> &amp; UNGPRF Index SR 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Met: Commits to all 4 ILO core conventions</li> <li>Not met: Communication of policy commitments to stakeholder: As indicated above, the Company conducts 'training and build capability both internally and with our suppliers. We regularly conduct internal training on our Policy Letter 24 and the supply chain sustainability program with our global purchasing staff.' However, no further information found on how the Company communicates its policy commitments to other stakeholders, including local communities and other potentially affected stakeholders (different than suppliers). [MSA 2019, 24/04/2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>Not met: How policy commitments are made accessible to audience</li> </ul>   |
| B.1.4.b        | Communication /dissemination of policy commitment(s) to business relationships       | 1.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Met: Commits to all 4 ILO core conventions for suppliers</li> <li>Met: Requiring MO suppliers to communicate policy down the chain: The Company states in its Policy Letter No. 24: 'The Company encourages businesses throughout our supply chain to adopt and enforce similar policies in their own operations that are similar to those articulated here. Further, the Company will seek to identify and do business with organizations that conduct their businesses to standards that are consistent with this Policy Letter including working to extend these principles within their own supply chain'. The Company states in its UNGPFR Index: 'We encourage all our business partners throughout our supply chain to adopt and enforce similar policies to our Policy Letter 24 in their own operations. Our Global Terms and Conditions (GT&amp;Cs) forbid the use of forced labor, child labor and physically abusive disciplinary practices. Our Supplier Web Guide is issued to all our business partners and suppliers and requires that they comply with standards set out in the guide. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a> &amp; UNGPRF Index SR 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Met: How HR commitments made binding/contractual: In addition, the Company indicates in its UNGPFR Index: 'We encourage all our business partners throughout our supply chain to adopt and enforce similar policies to our Policy Letter 24 in their own operations. Our Global Terms and Conditions (GT&amp;Cs) forbid the use of forced labor, child labor and physically abusive disciplinary practices.' In addition, in its Global Terms and Conditions, the Company indicates: 'The Buyer has adopted a Code of Basic Working Conditions that includes the requirements of Section 29 (a) and other work-place practices. The Code applies to all of the Buyer's operations. The Code can be found via the Social Responsibility Web-Guide or by contacting the Buyer directly. [UNGPRF Index SR 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a> &amp; Global Terms and Conditions, 12/2007: <a href="http://performanceparts.ford.com">performanceparts.ford.com</a>]</li> <li>Not met: Including on MO suppliers</li> </ul> |
| B.1.5          | Training on Human Rights   | 1.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Met: Scores at least 1 on A.1.2</li> </ul>   |



| Indicator Code | Indicator name                    | Score (out of 2) | Explanation  |
|----------------|-----------------------------------|------------------|--|
|                |                                   |                  | <ul style="list-style-type: none"> <li>• Met: Trains all workers on HR policy commitments: In its UNGPFR Index, the Company reports: 'Our Policy Letters and Directives set expectations for our employees and others working on our behalf (our workforce). These are contained in our Code of Conduct, available to employees in 14 languages. These expectations are reinforced in mandatory online training courses, which are periodically refreshed and reviewed to ensure the content remains relevant and appropriate. As an example, all of our global employees will complete harassment and discrimination training by the end of 2020'. [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Trains relevant MO managers including procurement: In addition, in its MSA Statement, the Company indicates: 'We regularly conduct internal training on our Policy Letter 24 and the supply chain sustainability program with our global purchasing staff.' Moreover, in its UNGPFR Index the Company reports: 'Since March 2020, 4,811 Purchasing employees who are likely to be visiting our global supplier locations have been trained or retrained on human rights and working conditions'. [MSA 2019, 24/04/2020: <a href="https://corporate.ford.com">corporate.ford.com</a> &amp; UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Met: Both requirements under score 1 met</li> </ul>  |
| B.1.6          | Monitoring and corrective actions | 1.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Scores at least 1 on A.1.2</li> <li>• Met: Monitoring implementation of HR policy commitments: The Company reports in its UNGPFR Index 2020: 'Human rights issues are monitored throughout the year and brought to the attention of our Sustainability and Innovation Board of Directors Committee as they arise'. In addition, in document 'Respecting human rights in our facilities', it reports: 'Since 2004, Ford Motor Company has conducted around 50 human rights assessments to evaluate how our facilities around the world align with our Code of Human Rights, Basic Working Conditions and Corporate Responsibility (Policy Letter 24). Our historical assessments allowed us to engage in greater dialogue with our facilities and determine if there were any potential red flags. Due to the qualitative basis and limited reach of the survey format, we determined that the historical process for assessing human rights risk at our facilities needed to be updated and improved. After detailed analysis of the process, Ford has shifted to a more responsive, quantitative approach utilizing an established online third-party assessment tool from the Responsible Business Alliance (RBA)'. [Respecting human rights in our facilities, N/A: <a href="https://corporate.ford.com">corporate.ford.com</a> &amp; UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Monitoring MO suppliers: The Company that 'Third-party social responsibility audits let suppliers know whether they meet their legal requirements and our expectations, while highlighting areas for improvement. We have held 1,186 supplier audits and 1,612 follow-up assessments worldwide to date. Through the Responsible Business Alliance (RBA), we work on issues such as human rights, working conditions, child labor, forced labor, ethical sourcing and environmental responsibility. [...] We use its Validated Audit Protocol to assess labor, health and safety, management systems, ethics and environmental issues. In 2019, 23 audits were conducted, 100 percent of which were externally validated and certified by the RBA'. [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Describes corrective action process: In addition, the Company reports: 'For any non-conformances found, we expect suppliers to develop action plans that detail causes and planned remediation. For more serious priority non-conformances, we review and monitor immediate containment plans and longer-term corrective action plans. Although we reserve the right to end our relationship should any supplier fail to comply with our Global Terms, we did not end any supplier relationships due to unresolved audit findings in 2019. [...] In our 2019 RBA audits, approximately 6 percent of identified non-conformances required immediate action, of which 55 percent are labor issues (primarily working hours and consecutive days of work), 43 percent are health and safety issues related to emergency preparedness and 2 percent are related to ineffective management systems.' Although the Company discloses figures of non-compliances by human rights issue, they are reported in percentages and there is no information about the total number of incidents found. [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Example of corrective action: The Company reports: 'In Taiwan, we found recruitment fees were being charged at a supplier site to migrant employees. These</li> </ul> |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                |   |                  | <p>fees are regulated by the government in Taiwan and can be legally charged to migrant workers'. This however, is a violation of Ford's GTCs and the supplier was asked to remediate. The supplier reimbursed each worker for the fees charged by both the regional and sending brokers. [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Discloses % of MO supply chain monitored: Although the Company reports the number of audits conducted in 2019 (23), no information found about the percentage of its supply chain that this figure represents. [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul>   |
| B.1.7          | Engaging business relationships                               | 1.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: HR affects MO selection of suppliers: The Company states in its Policy Letter No. 24: 'The Company encourages businesses throughout our supply chain to adopt and enforce similar policies in their own operations that are similar to those articulated here. Further, the Company will seek to identify and do business with organizations that conduct their businesses to standards that are consistent with this Policy Letter including working to extend these principles within their own supply chain'. However, it is not clear how the Company actually takes into account human rights when selecting potential suppliers. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: HR affects on-going MO supplier relationships: The Company states in its UNGPFR Index: 'We have the right to immediately suspend or discontinue engagement with suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses.' [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Met: Working with MO suppliers to improve performance: The Company reports in its UNGPFR Index: 'We work with our suppliers to enable them to responsibly manage human rights through training and working sessions. Due to the size and complexity of our business, we provide e-learning modules to our global suppliers in collaboration with AIAG and Drive Sustainability that include the following topics: Child labor/young workers, Wages and benefits, Working hours, Forced labor, Freedom of association, Health and safety, Harassment, Non-discrimination, Business ethics, Environmental responsibility'. In previous report, the Company also indicated that 'In 2018 supplier representatives from 127 direct and indirect supplier sites in four countries (China, Hungary, Mexico and Thailand) attended training sessions covering human rights, working conditions, business ethics and the environment'. [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> |
| B.1.8          | Approach to engagement with potentially affected stakeholders | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Stakeholder process or systems: In its GRI Index, the Company indicates: 'Ford engages at many levels, including interactions between many different company functions and a wide variety of external and internal stakeholders groups, locally and globally. [...] In addition to actively participating in industry organizations, we organize meetings with individuals and groups of stakeholders to solicit their input. [...] Our procurement team engages with suppliers on sustainability performance, and our manufacturing plants forge links with local communities as part of being a good neighbor. Relevant stakeholder feedback on sustainability issues is also reported to executive management or our Sustainability and Innovation Board Committee as needed, through normal management channels including Business Plan Reviews. Through all these interactions and processes, we formulate engagement programs and identify stakeholders with whom to engage and track progress.' In addition, the Company discloses information about its stakeholders groups and the approach taken for engagement. [GRI Index 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Not met: Frequency and triggers for engagement: As indicated above, the Company discloses information about its stakeholder groups and the approach taken to engagement, and indicates: 'The formality and regularity of each engagement approach vary on a case-by-case basis'. However, no details found regarding frequency and triggers for engagement. [GRI Index 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Not met: Workers in MO SC engaged</li> <li>• Not met: Communities in the MO SC engaged</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>   |



## B.2 Human Rights Due Diligence (15% of Total)

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
| B.2.1          | Identifying: Processes and triggers for identifying human rights risks and impacts           | 1.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifying risks in own operations: The Company describes its process: 'We prioritize human rights issues at Ford and in our supply chain using a formal saliency assessment process. Conducted in line with the UN Guiding Principles Reporting Framework (UNGPRF), our 2020 saliency assessment identified and updated the human rights issues at risk of the most severe negative impacts through our activities and business relationships. Having conducted the first saliency assessment in the auto industry in 2018, our second assessment built on this foundation. It was conducted with a third-party consultancy and we considered geographic, social, economic, diversity, community and supplier-related issues. The process included desk-based research, interviews, an online survey and workshops with external stakeholders, including investors, industry experts and suppliers, along with Ford employees representing all skill teams and global regions' [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Identifying risks in MO suppliers: As indicated above, the human rights risk assessment, includes: 'We prioritize human rights issues at Ford and in our supply chain using a formal saliency assessment process.' [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Ongoing global risk identification: In addition, the Company states: 'We review these issues annually and communicate our progress externally through the pages of this report, as well as our UNGPRF Index.' [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: In consultation with stakeholders: As indicated above, the Company conducted: 'The process included desk-based research, interviews, an online survey and workshops with external stakeholders, including investors, industry experts and suppliers, along with Ford employees representing all skill teams and global regions'. Suppliers and company employees are considered affected stakeholders. [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Not met: In consultation with HR experts: The Company has provided comments to CHRB regarding this indicator. However, this document or its content has not been found in publicly available sources. The human rights expert, including name, has to be consulted as part the human rights risks identification process and its name has to be disclosed. As indicated above, the Company carried out assessment with third-party consultancy. No further details found. [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a> &amp; UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Not met: Triggered by new circumstances</li> </ul> |
| B.2.2          | Assessing: Assessment of risks and impacts identified (salient risks and key industry risks) | 2                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Salient risk assessment (and context): The Company reports in its UNGPFR Index: 'Our 10 human rights issues were prioritized from a long list of 23 potential human rights issues relevant to Ford, based on the potential negative impact the issues could have on human rights. We determined these issues in partnership with a third-party consultancy. The assessment included: Desk-based research covering a review of Ford's relevant internal documentation, a review of cross-industry peers and best practice reporting and a media scan to identify a long list of potential issues; Interviews with internal representatives from across Ford's global business, including senior management, as well as external stakeholders, including suppliers, an investor representative, NGOs and industry experts, to review and prioritize the identified issues in terms of their potential to generate adverse impacts on populations through Ford's activities or business relationships, and determine especially vulnerable populations; Online survey distributed to a focused group of global employees to identify top salient issues, vulnerable populations, priority actions for Ford and emerging human rights issues; Workshops with internal and external stakeholders to validate and confirm the assessment findings. [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Public disclosure of salient risks: The Company indicates that the '2020 saliency assessment identified potential higher-risk areas within Ford's operations and along our value chain where populations are particularly vulnerable. These include conflict-affected and high-risk areas within raw materials sourcing and supply chain parts manufacturing. Additionally, they include potential human rights risks associated with global locations and joint ventures including in China, India, Thailand, Russia and Mexico'. It also discloses its salient human rights issues in its UNGPFR Index, including: 'Access to water and sanitation; [...]; Child Labor; Forced Labor and ethical recruiting; Harassment and discrimination; Health, safety and</li> </ul>  |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
|                |   |                  | <p>security; Human trafficking; [...]' [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> </ul>   |
| B.2.3          | Integrating and Acting: Integrating assessment findings internally and taking appropriate action              | 2                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Action Plans to mitigate risks: The Company disclosed information about actions put in place to face each one of its salient human rights issues (see B.2.2) in its UNGPRF Index. For instance, with respect Child labour, it indicates: 'We verify employment eligibility of job applicants consistent with local laws and company policy. We are piloting an industry-respected process to assess human rights at our own manufacturing facilities. We safeguard against the threat of child labor by auditing suppliers and maintaining compliance with all legislative initiatives, acts and regulations designed to increase transparency and promote due diligence. We verify that our ABF suppliers have codes of conduct aligned with our Policy Letter 24. Looking ahead, we are considering an expanded use of self-assessment questionnaires (SAQs) and audits in the sourcing process and implementing country-based training on trending topics.' [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a> &amp; UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Including in MO supply chain: As indicated above, the Company discloses information about its actions to face each one of its salient human rights issues. With respect 'Forced Labour' in its supply chain it indicates: 'Supply chain initiatives include auditing limited high-risk Tier 1 sites with corrective action plans and monitoring through completion. We also use a supplier SAQ to better understand suppliers' policies. We verify that our ABF suppliers have codes of conduct aligned with our Policy Letter 24. Looking ahead, we are considering an expanded use of SAQs and audits in the sourcing process and implementing country-based training on trending topics'. [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Example of Actions decided: With respect the salient human right issue 'Access to water and sanitation', the Company indicates: 'We manage water sources efficiently and sustainably, especially in water-stressed areas, and ensuring our water-extraction policies and practices do not negatively impact access to water for other users. Currently, our corporate water strategy goal is a 30 percent operational water-use reduction from 2015 to 2020, with a 13.4% absolute operational water reduction since 2018. We also have aspirational goals: to use freshwater for human consumption only, plus zero water withdrawals for manufacturing processes - to be achieved by installing non-water-based technologies and relying on alternative sources such as other companies' treated wastewater'. [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> </ul> |
| B.2.4          | Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective: The Company indicates in its UNGPRF Index: 'In 2019, a cross-functional team developed a process to manage and track our action plans to prevent, manage and remediate salient human rights issues. This process will help us track the effectiveness of our due diligence systems and performance, and indicate opportunities to focus our efforts to address human rights issues, including those that affect how we source materials responsibly.' However, no further evidence found describing process to check effectiveness. [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Not met: Lessons learnt from checking effectiveness: The Company indicates: 'During 2019, we worked with a supplier in Taiwan to reimburse recruitment fees that were being charged to migrant workers at the supplier's site. Although fees are regulated by the government of Taiwan and can be legally charged to migrant workers, we requested the supplier provide remediation to the workers by reimbursing all recruitment and service fees associated with the workers employment in accordance with our ethical recruiting expectations. Our team worked with the supplier to identify policies and procedures to prevent and remediate fees in the future. These policies were adopted by the supplier and implemented in other facilities, thereby spreading the effect of the corrective action beyond Taiwan. Lessons learned resulted in Ford's partnership with the Responsible Labor Initiative (RLI) to provide training and capacity building focusing on recruitment fees for our Taiwan suppliers.' However, evidence focuses in specific corrective action plan for a supplier. It is not clear which are the lessons learned from checking effectiveness of risk-mitigating action plan (training and capacity building focusing on recruitment fees for Taiwan suppliers). The Company</li> </ul>   |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                |   |                  | provided additional comments to CHRB regarding this indicator. However, it was not material. [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a> ]<br>Score 2<br><ul style="list-style-type: none"> <li>Not met: Both requirement under score 1 met</li> </ul>   |
| B.2.5          | Communicating : Accounting for how human rights impacts are addressed | 0.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Met: Comms plan re identifying risks: See indicator B.2.1</li> <li>Met: Comms plan re assessing risks: See indicator B.2.2</li> <li>Met: Comms plan re action plans for risks: See indicator B.2.3</li> <li>Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4.</li> <li>Met: Including MO suppliers: See indicators B.2.1 - B.2.3</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not met: Responding to affected stakeholders concerns</li> <li>Not met: Ensuring affected stakeholders can access communications</li> </ul> |

### C. Remedies and Grievance Mechanisms (15% of Total)

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
| C.1            | Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers                              | 1.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Met: Channel accessible to all workers: The Company indicates that 'Our compliance program facilitates the confidential reporting of known or potential violations of the law or of our policies. Our people can report violations directly to Human Resources or the Compliance, Ethics and Integrity Office as well as the Office of General Counsel or the General Auditors' Office. Violations can also be reported using the SpeakUp reporting mechanism, telephone hotlines, websites or email, some of which allow for anonymous reporting'. [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not met: Number grievances filed, addressed or resolved</li> <li>Not met: Channel is available in all appropriate languages: Although the Company discloses some information about its 'The Right Way app', that allows individuals to report any suspected violations, including that it is available in 7 languages, it is not clear whether reporting channels are available in all relevant languages. [MSA 2019, 24/04/2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>Met: Opens own system to MO supplier workers: The Company states: 'We maintain internal/external accountability, holding all Ford employees and suppliers accountable to the standards on human trafficking set out in GT&amp;Cs, web guides, and Policy Letter 24.' In addition, it indicates that the 'Right Way app' 'is available to our employees, suppliers and other business partners to become more familiar with Ford ethical policies and practices. Within the app is the ability for individuals to report any suspected violations.' [MSA 2019, 24/04/2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> |
| C.2            | Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Not met: Grievance mechanism for community: Although the Company states that its 'publicly available mobile app, The Right Way, can be used by people inside and outside our company and provides just-in-time compliance and ethics information.', it is not clear whether it is available for external stakeholders, as in its MSA 2019 it indicates: 'Ford Motor Company has developed The Right Way app, which is a free mobile app that is available in seven languages. The app is available to our employees, suppliers and other business partners to become more familiar with Ford ethical policies and practices'. [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a> &amp; MSA 2019, 24/04/2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not met: Describes accessibility and local languages</li> <li>Not met: Expects MO supplier to have community grievance systems</li> <li>Not met: MO supplier communities use global system</li> </ul>   |
| C.3            | Users are involved in the design and performance of the channel(s)/mechanism(s)                               | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Not met: Engages users to create or assess system</li> <li>Not met: Example of how they do this</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not met: Engages with users on system performance</li> <li>Not met: Provides user engagement example on performance</li> <li>Not met: MO suppliers consult users in creation or assessment</li> </ul>   |
| C.4            | Procedures related to the   | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Not met: Response timescales</li> </ul>  |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                | mechanism(s)/channel(s) are publicly available and explained                        |                  | <ul style="list-style-type: none"> <li>• Not met: How complainants will be informed</li> <li>• Not met: Who is handling the complaint</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level: The Company states: 'All allegations are reviewed by a cross-functional committee, which also oversees the investigations and implements corrective or disciplinary actions.' However, this indicator looks for evidence of how complaints from workers and all external stakeholders may be escalated to more senior levels or independent for resolution. This needs to be also an option for the complainant, not only at Company's discretion. [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul>  |
| C.5            | Commitment to non-retaliation over complaints or concerns made                      | 1                | The individual elements of the assessment are met or not as follows:<br>Score 1 <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation: The Company indicates in its Policy Letter No. 24: 'All Company personnel must report known or suspected violations of this Policy through the established reporting channels. The Company prohibits retaliation against anyone who in good faith reports a violation.' In addition, in its UNGPRF Index, it indicates: 'Through this policy we do not: Bring retaliatory suits against persons or organizations who have brought or tried to bring a case against us involving credible allegation of adverse human rights impacts, or against the lawyers representing them (including retaliatory civil litigation, including for defamation, filing criminal complaints, or any similar actions against claimants or their lawyers); Engage in violent acts or threats to the livelihoods, careers or reputation of claimants or their lawyers. We communicate this regularly to our workforce through different communication channels.' [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="https://corporate.ford.com">corporate.ford.com</a> &amp; UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Practical measures to prevent retaliation: In addition, the Company indicates in its Code of Conduct Handbook: 'All reports are handled as confidentially as possible, while still enabling the Company to conduct a thorough investigation. However, you may make an anonymous report by calling a hotline, or by submitting an incident report form obtained from the Corporate Security and Fire Web site'. [Code of Conduct Handbook, 11/2007]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects MO suppliers to prohibit retaliation</li> </ul> |
| C.6            | Company involvement with State-based judicial and non-judicial grievance mechanisms | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1 <ul style="list-style-type: none"> <li>• Not met: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>  |
| C.7            | Remedying adverse impacts and incorporating lessons learned                         | 1.5              | The individual elements of the assessment are met or not as follows:<br>Score 1 <ul style="list-style-type: none"> <li>• Met: Describes how remedy has been provided: In its UNGPRF Index, the Company reports: 'During 2019, we worked with a supplier in Taiwan to reimburse recruitment fees that were being charged to migrant workers at the supplier's site. Although fees are regulated by the government of Taiwan and can be legally charged to migrant workers, we requested the supplier provide remediation by reimbursing all recruitment and service fees associated with the workers' employment in accordance with our ethical recruiting expectations.' [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Changes introduced to stop repetition: In addition, it indicates: 'Our team worked with the supplier to identify policies and procedures to prevent and remediate fees in the future. These policies were adopted by the supplier and implemented in other facilities, thereby spreading the effect of the corrective action beyond Taiwan. Lessons learned resulted in a partnership with the RLI, to provide training and capacity building with a focus on recruitment fees for our Taiwan suppliers'. [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>  |

## D. Performance: Company Human Rights Practices (20% of Total)

## D.5 Automotive Manufacturing

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| D.5.1.a        | Living wage (in own production or manufacturing operations) | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Living wage target timeframe: The Company's Policy Letter No. 24 reads: 'The Company will promote our employees' material well-being by providing compensation and benefits that are competitive and comply with applicable law.' However, no reference found to living wage. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>Not met: Describes how living wage determined</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Achieved payment of living wage</li> <li>Not met: Regularly review definition of living wage with unions</li> </ul>   |
| D.5.1.b        | Living wage (in the supply chain)                           | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Living wage in supplier code or contracts: The Company states in its UNGPFR Index that it encourages 'all our business partners throughout our supply chain to adopt and enforce similar policies to our Policy Letter 24 in their own operations'. However, its policy does not include a provision with respect living wage. Furthermore, no evidence found of a provision related to living wage included in the Company's Global Terms and Conditions (GT&amp;Cs)'. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a> &amp; UNGPFR Index SR 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>Not met: Improving living wage practices of suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Not met: Provide analysis of trends demonstrating progress</li> </ul>   |
| D.5.2          | Aligning purchasing decisions with human rights             | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Avoids business model pressure on HRs</li> <li>Not met: Positive incentives to respect human rights: The Company states: 'The Company encourages businesses throughout our supply chain to adopt and enforce similar policies in their own operations that are similar to those articulated here. Further, the Company will seek to identify and do business with organizations that conduct their businesses to standards that are consistent with this Policy Letter including working to extend these principles within their own supply chain.' However, no evidence found describing how the Company puts in place positive incentives to promote the improvement of human rights performance (price premiums, repeat business, increased orders or longer contracts with good performers). [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> </ul>  |
| D.5.3          | Mapping and disclosing the supply chain                     | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Identifies suppliers back to product source: The Company indicates in its '2020 Ford ABF Suppliers' document that 'In 2005, [it] entered into Aligned Business Framework (ABF) agreements with select suppliers to strengthen collaboration and develop a sustainable business model to drive mutual profitability and technology development'. The Company also discloses information about its Smelters and Refiners in its Form SD / Conflict Mineral Report. However, no evidence found of the Company mapping all its suppliers including direct or indirect suppliers, indicating how it goes about this. [Supplier List 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a> &amp; Conflict Mineral Report 2019, 29/05/2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Discloses significant parts of supply chain and why: Although the Company discloses a ABF Suppliers List, it is not clear whether ABF Suppliers represent a significant part of its supply chain. Furthermore, this list only includes names but no addresses or location. [Supplier List 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> |



| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
| D.5.4.a        | Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)              | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Does not use child labour: The Company states in its Policy Letter No. 24 that it 'will not use child labor.' [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Age verification of job applicants and workers: The Company states with respect child labour: 'We verify employment eligibility of job applicants consistent with local laws and company policy'. [UNGPRF Index SR 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remediation if children identified</li> </ul>  |
| D.5.4.b        | Prohibition on child labour: Age verification and corrective actions (in the supply chain)  | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Child Labour rules in codes or contracts: The Company states in its UNGPFR Index that its Global Terms and Conditions '[GT&amp;Cs] forbid the use of forced labor, child labor and physically abusive disciplinary practices'. However, no evidence found of child labour requirements neither in its GT&amp;Cs nor in its Policy Letter No. 24, including age verification and remediation programmes. [UNGPRF Index SR 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a> &amp; Global Terms and Conditions, 12/2007: <a href="http://performanceparts.ford.com">performanceparts.ford.com</a>]</li> <li>• Met: How working with suppliers on child labour: The Company reports in its UNGPFR Index: 'We work with our suppliers to enable them to responsibly manage human rights through training and working sessions. Due to the size and complexity of our business, we provide e-learning modules to our global suppliers in collaboration with AIAG and Drive Sustainability that include the following topics: Child labor/young workers; [...] For in-person training, we focus our efforts on suppliers located in countries that pose the highest risk of substandard working conditions. In 2019 supplier representatives from 96 direct and indirect supplier sites in five countries (Brazil, Malaysia, Poland, South Africa and Taiwan) attended training sessions including all topics listed above'. [UNGPRF Index SR 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>   |
| D.5.5.a        | Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations) | 2                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Pays workers in full and on time: The Company states in its UNGPRF Index: 'Within our operations, we pay our workers regularly, in full and on time, and all workers receive a pay slip with their wages explaining any legitimate deductions. We do not require workers to pay work-related fees, and we pay all costs and charges involved in the recruitment process' [UNGPRF Index SR 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Payslips show any legitimate deductions: As indicated above, the Company states that 'all workers receive a pay slip with their wages explaining any legitimate deductions. We do not require workers to pay work-related fees, and we pay all costs and charges involved in the recruitment process'. [UNGPRF Index SR 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: The Company reports in its Sustainability Report 2016/2017: 'In 2016, we reviewed our internal policies and procedures to ensure they aligned with the fundamental tenets of ethical recruiting. We require that Ford employees and their agents shall not: Destroy, conceal, confiscate or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or driver's licenses, regardless of issuing authority; Use misleading or fraudulent practices during the recruitment of employees or offering of employment; Charge employees recruitment fees. Our review of our operations resulted in no significant findings in our own facilities'. [Sustainability Report 2016/2017, 2017: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> |



| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| D.5.5.b        | Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain) | 1.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Debt and fees rules in codes or contracts: The Company states in its UNGPFR Index that its Global Terms and Conditions (GT&amp;Cs) 'forbid the use of forced labor, child labor and physically abusive disciplinary practices.' In addition, in its Sustainability Report, the Company indicates: 'Our policies prohibit Ford employees and our suppliers from: [...]; Using misleading or fraudulent practices during the recruitment process; Imposing financial burdens on workers by withholding wages or expenses, or charging them for any fees involved in the recruitment process. Suppliers are required to repay any fees that workers pay during the recruitment process'. [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a> &amp; Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>Met: How working with suppliers on debt &amp; fees: The Company reports in its UNGPFR Index: 'We work with our suppliers to enable them to responsibly manage human rights through training and working sessions. Due to the size and complexity of our business, we provide e-learning modules to our global suppliers in collaboration with AIAG and Drive Sustainability that include the following topics: [...]; Forced labor; [...]. For in-person training, we focus our efforts on suppliers located in countries that pose the highest risk of substandard working conditions. In 2019 supplier representatives from 96 direct and indirect supplier sites in five countries (Brazil, Malaysia, Poland, South Africa and Taiwan) attended training sessions including all topics listed above.' In addition, in its Sustainability Report, the Company indicates: 'Our team worked with the supplier to identify policies and procedures to prevent and remediate fees in the future. These policies were adopted by the supplier and implemented in other facilities, thereby spreading the effect of the corrective action beyond Taiwan. Lessons learned resulted in a partnership with the RLI, to provide training and capacity building with a focus on recruitment fees for our Taiwan suppliers'. [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a> &amp; UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Both requirements under score 1 met</li> <li>Not met: Provide analysis of trends in progress made</li> </ul> |
| D.5.5.c        | Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations)   | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Does not retain documents or restrict movement: The Company indicates in its Sustainability Report: 'Our policies and procedures for our business, including our suppliers, are aligned with the fundamental principles of ethical recruitment, one of our salient human rights issues. Our policies prohibit Ford employees and our suppliers from: Destroying, concealing, confiscating or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or driver's licenses, regardless of the issuing authority'. [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: How sure about agencies or brokers</li> </ul>  |
| D.5.5.d        | Prohibition on forced labour: Restrictions on workers (in the supply chain)                             | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Free movement rules in codes or contracts: The Company states in its UNGPFR Index that its Global Terms and Conditions (GT&amp;Cs) 'forbid the use of forced labor, child labor and physically abusive disciplinary practices.' In addition, in its Sustainability Report, the Company indicates: 'Our policies prohibit Ford employees and our suppliers from: Destroying, concealing, confiscating or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or driver's licenses, regardless of the issuing authority'. [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a> &amp; Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: The Company reports in its UNGPFR Index: 'We work with our suppliers to enable them to responsibly manage human rights through training and working sessions. Due to the size and complexity of our business, we provide e-learning modules to our global suppliers in collaboration with AIAG and Drive Sustainability that include the following topics: [...]; Forced labor; [...]. For in-person training, we focus our efforts on suppliers located in countries that pose the highest risk of substandard working conditions. In 2019 supplier representatives from 96 direct and indirect supplier sites in five countries (Brazil, Malaysia, Poland, South Africa and Taiwan) attended training sessions including all topics listed above.' However, no information found showing that the training programmes cover freedom of movement. [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul>   |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
|                |  |                  | <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>   |
| D.5.6.a        | Freedom of association and collective bargaining (in own production or manufacturing operations) | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company states in its Policy Letter No. 2: 'The Company recognizes and respects its employees' right to associate freely and bargain collectively. The Company will work constructively with recognized employee representatives to promote the interests of its employees. In locations where employees are not represented by unions, the Company will provide opportunities for employee concerns to be heard'. In addition, its International Framework Agreement reads: 'The signatories respect the employees' democratic rights to determine representation and will not use tactics of harassment or discrimination to influence employees' exercise of these rights.' However, no evidence found describing the measures put in place to prohibit any form of intimidation, harassment, retaliation against workers seeking to exercise these rights. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a> &amp; International Framework Agreement, 2012: <a href="http://industrial-union.org">industrial-union.org</a>]</li> <li>• Not met: Discloses % covered by collective bargaining: In its GRI Index, the Company reports: 'In the United States, approximately 99 percent of these unionized hourly employees in our Automotive segment are represented by the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America ("UAW" or "United Auto Workers"). At December 31, 2019, approximately 56,000 hourly employees in the United States were represented by the UAW (Employment Data, page 12). We earned a reputation for being a labor friendly organization after reaching a US labor agreement with the UAW after only 3 days of negotiations, find out more in this article. A substantial number of our employees in other regions are represented by unions or government councils.' However, no evidence found of the global percentage of employees covered by collective bargain agreements. [GRI Index 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul> |
| D.5.6.b        | Freedom of association and collective bargaining (in the supply chain)                           | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: FoA &amp; CB rules in codes or contracts: The Company states in its UNGPFR Index that it encourages 'all our business partners throughout our supply chain to adopt and enforce similar policies to our Policy Letter 24 in their own operations.' However, its policy does not include a provision to prohibit intimidation, harassment, retaliation or violence against union members and union representatives. Furthermore, no evidence found of a provision related to freedom of association and collective bargaining included in the Company's Global Terms and Conditions (GT&amp;Cs). [UNGPRF Index SR 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a> &amp; Global Terms and Conditions, 12/2007: <a href="http://performanceparts.ford.com">performanceparts.ford.com</a>]</li> <li>• Met: How working with suppliers on FoA and CB: The Company reports in its UNGPFR Index: 'We work with our suppliers to enable them to responsibly manage human rights through training and working sessions. Due to the size and complexity of our business, we provide e-learning modules to our global suppliers in collaboration with AIAG and Drive Sustainability that include the following topics: [...]; Freedom of association; [...]. For in-person training, we focus our efforts on suppliers located in countries that pose the highest risk of substandard working conditions. In 2019 supplier representatives from 96 direct and indirect supplier sites in five countries (Brazil, Malaysia, Poland, South Africa and Taiwan) attended training sessions including all topics listed above'. [UNGPRF Index SR 2020, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>   |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
| D.5.7.a        | Health and safety:<br>Fatalities, lost days, injury rates (in own production of manufacturing operations) | 1.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Injury Rate disclosures</li> <li>• Met: Lost days or near miss disclosure: The Company discloses figures of its Lost-Time Case Rate (per 100 Employees) (Cases with one or more days away from work per 200,000 hours) by region and also for its Global operations in its Performance Data Report: 2019 (0,39), 2018 (0,41), and 2017 (0,38). [Performance Data SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Fatalities disclosures: The Company also reports the number of fatalities for the last three years: 2019 (0), 2018 (1), 2017(2). This figures cover own employees and contractors. [Performance Data SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Set targets for H&amp;S performance: The Company discloses its targets related to health and safety in its Sustainability Report: 'Fatalities target is always zero; Zero serious injuries, attain industry competitive lost-time and drive continuous improvement; Maintain or improve employee personal health and well-being'. [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Not met: Met targets or explains why not: Also in its Sustainability Report, the Company indicates: 'We did not have any fatal incidents in 2019 to report. This is a significant achievement for us because unfortunately, we have experienced fatalities in previous years. [...] Our lost-time case rate (LTCR) decreased from 0.41 to 0.39.' However, no evidence found regarding the zero serious injury target being not met. [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul>   |
| D.5.7.b        | Health and safety:<br>Fatalities, lost days, injury rates (in the supply chain)                           | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Sets out clear Health and Safety requirements: The Company states in its UNGPFR Index that it encourages 'all our business partners throughout our supply chain to adopt and enforce similar policies to our Policy Letter 24 in their own operations.' However, neither its Policy Letter No. 24 nor its 'Environmental Policy: Protecting Health and the Environment' include clear health and safety requirements. Also no evidence found of detailed requirements related to health and safety included in the Company's Global Terms and Conditions (GT&amp;Cs). [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="https://corporate.ford.com">corporate.ford.com</a> &amp; Global Terms and Conditions, 12/2007: <a href="https://performanceparts.ford.com">performanceparts.ford.com</a>]</li> <li>• Not met: Injury rate disclosures</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Not met: Fatalities disclosures</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How working with suppliers on H&amp;S: The Company reports in its UNGPFR Index: 'We work with our suppliers to enable them to responsibly manage human rights through training and working sessions. Due to the size and complexity of our business, we provide e-learning modules to our global suppliers in collaboration with AIAG and Drive Sustainability that include the following topics: [...]; Health and safety; [...]'. For in-person training, we focus our efforts on suppliers located in countries that pose the highest risk of substandard working conditions. In 2019 supplier representatives from 96 direct and indirect supplier sites in five countries (Brazil, Malaysia, Poland, South Africa and Taiwan) attended training sessions including all topics listed above'. [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul> |
| D.5.8.a        | Women's rights (in own production or manufacturing operations)  | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Process to stop harassment and violence: The Company reports that it 'has a strong focus on reinforcing our policies to ensure that the work environment of all our manufacturing facilities is free of harassment and discrimination. In recent years, we have bolstered our employee programs to address these issues more directly. Looking ahead, we plan to complete mandatory anti-harassment training of all global employees by the end of 2020. Throughout all of our facilities, we continue to encourage employees to report any incidents of harassment, discrimination or retaliation, and in all cases we investigate promptly and take appropriate action.' In addition, in its Sustainability Report it indicates: 'We will complete mandatory anti-harassment training of all global employees by the end of 2020'. [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a> &amp; Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Not met: Working conditions take account of gender</li> </ul>   |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                |   |                  | <ul style="list-style-type: none"> <li>• Met: Equality of opportunity at all levels: The Company reports in its SDG Index: 'Ford's Global Salaried Gender Pay Ratio, defined as the weighted average ratio of average female salaries to average male salaries within peer groups worldwide is 98.2 percent'. The Company, therefore, is monitoring this issue at all levels of employment. In addition, in its UNGPRF Index, it indicates: 'We are focused on advancing pay for women and creating a supportive work environment where women can thrive.' [UNSDG Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a> &amp; UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Meets all of the requirements under score 1</li> </ul>   |
| D.5.8.b        | Women's rights (in the supply chain)                          | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1 <ul style="list-style-type: none"> <li>• Not met: Women's rights in codes or contracts: According to its UNGPFR Index 'the Company 'encourages businesses throughout our supply chain to adopt and enforce similar policies in their own operations that are similar to those articulated here.' However, the policy does not include a commitment to respect women's rights. [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a> &amp; Global Terms and Conditions, 12/2007: <a href="https://performanceparts.ford.com">performanceparts.ford.com</a>]</li> <li>• Not met: How working with suppliers on women's rights: The Company reports in its UNGPFR Index: 'We work with our suppliers to enable them to responsibly manage human rights through training and working sessions. Due to the size and complexity of our business, we provide e-learning modules to our global suppliers in collaboration with AIAG and Drive Sustainability that include the following topics: [...]; Harassment; Non-discrimination; [...]'. However, it is not clear whether these training sessions include women's rights-related issues. [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>  |
| D.5.9.a        | Working hours (in own production or manufacturing operations) | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1 <ul style="list-style-type: none"> <li>• Not met: Respects max hours, min breaks and rest periods in its own operations: In its Policy Letter No. 2, the Company states: 'The Company will comply with applicable laws regulating hours of work.' However, no reference found to international standards or a explicit reference to a maximum of 48 hours for a regular working week (excluding overtime) and minimum resting periods. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How it implements and checks this</li> </ul>   |
| D.5.9.b        | Working hours (in the supply chain)                           | 1                | The individual elements of the assessment are met or not as follows:<br>Score 1 <ul style="list-style-type: none"> <li>• Not met: Working hours in codes or contracts: According to its UNGPFR Index 'the Company 'encourages businesses throughout our supply chain to adopt and enforce similar policies in their own operations that are similar to those articulated here'. However, the policy does not include a commitment to respect working hours specifying it follows ILO Standards, or requires a maximum of 48 hours of work for a regular working week and minimum breaks. No evidence found of working hours requirements in the Company's Global Terms and Conditions (GT&amp;Cs) either.. [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a> &amp; Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: How working with suppliers on working hours: The Company reports in its UNGPFR Index: 'We work with our suppliers to enable them to responsibly manage human rights through training and working sessions. Due to the size and complexity of our business, we provide e-learning modules to our global suppliers in collaboration with AIAG and Drive Sustainability that include the following topics: [...]; Working hours; [...]'. For in-person training, we focus our efforts on suppliers located in countries that pose the highest risk of substandard working conditions. In 2019 supplier representatives from 96 direct and indirect supplier sites in five countries (Brazil, Malaysia, Poland, South Africa and Taiwan) attended training sessions including all topics listed above.' [UNGPRF Index SR 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul> |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| D.5.10.a       | Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Due diligence in accordance with OECD Guidance in supplier contracts: The Company indicates in its Conflict mineral policy: 'Our suppliers are required to conduct due diligence to understand the source of the conflict minerals and other requested raw materials used in Ford products, source responsibly, and not knowingly provide products containing minerals that contribute to conflict as described in the Rule. [...] Additionally, Ford encourages suppliers to extend responsible sourcing and due diligence to include CAHRAs [Conflict-Affected and High-Risk Areas] [...] as defined by the Organization for Economic Co-operation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High- Risk Areas, ("OECD Guidance") and the related supplements for 3TG, including cobalt and mica. In addition, in its Form SD, the Company states: 'We made conflict minerals reporting a contractual requirement for our suppliers and we expect our suppliers to use audited "DRC conflict free" smelters and refiners.' However, the Company's Global Term and Conditions does not include a requirement to conduct due diligence in accordance with OECD Guidance. In addition, 'to encourage' is not considered a formal requirement following CHRB wording criteria. [Conflict Mineral Policy, 01/07/2020: <a href="http://corporate.ford.com">corporate.ford.com</a> &amp; Global Terms and Conditions, 12/2007: <a href="http://performanceparts.ford.com">performanceparts.ford.com</a>]</li> <li>• Met: Works with smelters/refiners and suppliers to build capacity: The Company reports in its Form SD: 'Our conflict management system includes the following action: [...] Built supply base knowledge capacity by developing training modules to ensure our suppliers understand our reporting and due diligence requirements and to assist them in their continuous improvement efforts to increase reporting transparency and source from conformant smelters and refiners. [...] We have taken the following actions [...]: 'We achieved a supplier conflict minerals reporting response rate of 100% for the fifth year in a row. We continue to work with our suppliers to improve the quality and completeness of their reports. [...] We directly contacted 60 smelters and refiners. In addition, through the AIAG SET, we led AIAG's coordinated industry outreach efforts to encourage smelter and refiner participation in RMI's audit program'. [Conflict Mineral Report 2019, 29/05/2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Contractual requirement to disclosure smelter/refiner information: Also in its Form SD, the Company states: 'We have instituted conflict minerals reporting requirements as part of our suppliers' contractual obligations through our Supplier Social Responsibility and Anti-Corruption Requirements Web-Guide, [...] For reporting purposes, we required our in-scope direct suppliers to complete the conflict minerals reporting template (CMRT) designed by the Responsible Mineral Initiative and Global e-Sustainability Initiative. Suppliers can submit their completed CMRT via email or by uploading it to a specific website'. Despite it is not indicated in Global Terms as conditions, as indicated, the Company states in its conflict mineral report that this is a contractual obligation. [Conflict Mineral Report 2019, 29/05/2020: <a href="http://corporate.ford.com">corporate.ford.com</a> &amp; Global Terms and Conditions, 12/2007: <a href="http://performanceparts.ford.com">performanceparts.ford.com</a>]</li> <li>• Not met: Contractual requirement covers all minerals</li> </ul> |
| D.5.10.b       | Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain   | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Risk identification and disclosure in line with OECD Guidance: The Company indicates that first, to determine 'in-scope suppliers' 'we performed a risk-based assessment of all suppliers of components or parts to our plants based on expected spend and 3TG content'. 'We required our in-scope direct suppliers to complete the Conflict Minerals Reporting Template (CMRT). 'We received responses from 100% of the in-scope suppliers surveyed'. 'We also continued our efforts to determine country of origin by sending a direct inquiry to smelters and refiners reported in our supply chain that were not identified on the RMI RCOI list'. As indicated below, comparing reports sent by suppliers and the RMI database, 'we were able to determine their audit status and gained visibility to assess potential risks in our supply chain'. Finally, it indicates that 'we use the RMI audit status database and RCOI (Responsible Country of Origin Inquiry) information as key inputs to help us manage risk in our supply chain. In addition, we actively review and assess other information such as publicly available incident reports, NGO reports, and government published information to help us assess risk in the supply chain'. However, no details found of the risk identified with respect 3TG [Conflict Mineral Report 2019, 29/05/2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul>  |



| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                |   |                  | <ul style="list-style-type: none"> <li>• Met: Identification of smelter/refiners and OECD Guidance: The Company reports sending Conflict Minerals Reporting Templates to 'in-scope suppliers': 'For the fifth year in a row, Ford received responses from 100% of the in-scope suppliers surveyed'. We compared our suppliers' smelter and refiner lists to the RMI database, and for those smelters and refiners that appear on both list, we were able to determine their audit status and gained visibility to assess potential risks in our supply chain. The RMI RMAP, RJC, and LBMA use independent 3rd party risk-based approach audits to confirm that smelters and refiners have carried out all 5-steps of the OECD Guidance Framework'. [Conflict Mineral Report 2019, 29/05/2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Discloses smelters/refiners judged in line with OECD Guidance: The Company discloses the list of smelters/refiners, indicating which are conformant to a 3rd Party responsible sourcing validation Program. [Conflict Mineral Report 2019, 29/05/2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Not met: Risk identification and disclosure covers all minerals</li> </ul>  |
| D.5.10.c       | Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes mineral risk management plan for supply chain: The Company reports in its Form SD: 'We have instituted the following process to respond to identified risks in the supply base: Established an escalation process to notify the Chief Operating Officer, North America and Vice President, Global Purchasing of risks when identified; Established a procedure for risk mitigation including monitoring, tracking, and reporting progress to the Chief Operating Officer, North America and Vice President, Global Purchasing As part of our risk mitigation process, entities that are reported by our suppliers but that have not been confirmed as an "eligible" smelter or refiner are reported to RMI for validation and assessment. In 2019, if our suppliers' lists contained smelters or refiners not identified on the RMI public "Conformant" or "Active" Smelter &amp; Refiner RMAP lists, we immediately notified suppliers. We also directed the suppliers where to find the RMI "Conformant" and "Active" Smelter &amp; Refiner information, encouraged our suppliers to complete outreach to their reported smelters and refiners that are not yet identified as "Conformant" or "Active," and/or consider alternate sourcing arrangements.' In addition, in the section 'Steps We Have Taken or Will Take, if Any, to Mitigate the Risk that Conflict Minerals', the Company indicates: 'We review suppliers' conflict minerals policies for alignment with our expectations. [...] We made conflict minerals reporting a contractual requirement for our suppliers and we expect our suppliers to use audited "DRC conflict free" smelters and refiners. [...]', among other actions included in its conflict minerals management system, such as: 'Built supply base knowledge capacity by developing training modules to ensure our suppliers understand our reporting and due diligence requirements and to assist them in their continuous improvement efforts to increase reporting transparency and source from conformant smelters and refiners'. [Conflict Mineral Report 2019, 29/05/2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Not met: Monitoring, tracking and whether better risk prevention/mitigation over time: The Company reports: 'Overall, 79% of the 302 smelters and refiners are considered "responsible sources of 3TG." This was a decline in conformance rate from 2018 in which 83% were considered "responsible sources of 3TG." The shutdown of many "conformant" tin smelters located in Indonesia was the major contributing factor to the overall decline in conformance rate.' However, no further information found describing the process to monitor or track the performance of risk prevention measures. [Conflict Mineral Report 2019, 29/05/2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Disclose better risk prevention/mitigation over time</li> <li>• Not met: Suppliers and stakeholders engaged in risk management strategy</li> <li>• Not met: Risk management and response processes cover all minerals</li> </ul> |



| Indicator Code | Indicator name                 | Score (out of 2) | Explanation  |
|----------------|--------------------------------|------------------|--|
| D.5.11         | Responsible Materials Sourcing | [SD.5.10]        | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Due diligence for raw materials in supplier code/contracts: The Company indicates: 'To increase transparency and responsibility in raw material sourcing, we have developed and are actively implementing a raw material sourcing strategy that expands our material due diligence program beyond conflict minerals. With certain raw materials, such as cobalt, mica, rubber and conflict minerals [...], suppliers may be asked to verify that the materials they supplied to us were sourced responsibly. We participate in workgroups and discussions to address ethical, environmental and labor issues, and use tools to ensure the responsible sourcing of specific raw materials as early in the sourcing process as possible. [...]</li> </ul> <p>We seek to identify and prevent risks in our supply chain associated with raw materials other than 3TG. To help our suppliers source materials ethically and responsibly, we use enhanced requirements in contracts, reporting requests and transparent dialogue. We've extended our responsible sourcing requirements beyond conflict minerals to additional materials.' The Company reports about its work in materials such as cobalt, mica, rubber or copper. However, it is not clear whether there are contractual requirements or code of conduct requirements for suppliers to carry out due diligence for raw materials. [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</p> <ul style="list-style-type: none"> <li>Not met: Works with suppliers to build capacity in risk assessment and due diligence: Although the Company reports in relation to work carried out in supply chains of different materials, no details found of specific supplier capacity building regarding these. [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Meets all requirements under score 1</li> <li>Not met: Identify the sources of high-risk raw materials in its supply chain: The Company indicates in its Sustainability Report: [With respect Cobalt]: 'We continue to explore supply chain mapping to gain greater transparency about the sources of the cobalt we use for our battery electric vehicles.' [With respect Mica]: 'We engage in regular dialogue with key coating suppliers to monitor the responsible sourcing of mica. In 2020, we plan to explore enhanced mica due diligence, consistent with our own commitment to protecting human rights and in adherence with local law. We participate in the RMI's mica working group to explore cross-industry collaborations that can result in enhanced mica supply chain risk identification and mitigation.' However, there is no further information including other materials and identifying suppliers back to the source (farm, ranch, mine). [Sustainability Report 2020, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> |

## E. Performance: Responses to Serious Allegations (20% of Total)

| Indicator Code | Indicator name                                       | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
| E(1).0         | Serious allegation No 1                              |                  | <ul style="list-style-type: none"> <li>Headline: Ford Motor settles class-action lawsuit on sexual harassment in the Chicago area for up to USD 10.1 million</li> <li>Area: Discrimination</li> <li>Story: In August 2017, Ford Motor agreed to pay up to USD 10.1 million to settle systemic racial and sexual harassment claims at two Chicago-area plants - a development that could reportedly allow it to avoid a class-action lawsuit being pursued in federal court. It is also been alleged that the women who complained were subject to retaliation from supervisors. According to the NY Times, 'a union official who did try to keep the plant accountable, says he was discouraged by Ford managers from helping women submit harassment complaints, and claimed in a suit that management "retaliated against him" when he would bring complaints forward.</li> </ul> <p>The Equal Employment Opportunity Commission investigated claims of harassment against female and black employees at the Ford plants. It found conduct in violation of the Civil Rights Act. This settlement, however, is not enough according to the lawyer representing the women in the class-action lawsuit. He is reported saying 'I don't think it goes far enough, and I don't think that it has provided any meaningful change in the plant environment and will do nothing to protect women'. The Chicago Tribune writes the lawyer 'said the agreement falls short and should offer "two or three times" the monetary settlement amount given the rampant harassment culture.'</p> <ul style="list-style-type: none"> <li>Sources: [Chicago Tribunal - 18/8/2017: <a href="https://digitaledition.chicagotribune.com">digitaledition.chicagotribune.com</a>][NY Times, 23/8/2019: <a href="https://google.com">google.com</a>][[]]</li> </ul> |
| E(1).1         | The Company has responded publicly to the allegation | 2                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Public response available: In an open letter, CEO Jim Hackett wrote 'Ford has been grappling with these allegations in Chicago for some time. There were</li> </ul>  |

| Indicator Code | Indicator name                                | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                |   |                  | <p>EEOC settlements in 1999 and earlier this year that will provide relief to women who were subjected to harassing conduct. While we believe that airing of these issues and the steps the company has taken will help us move forward, we are deeply disappointed that at any time any of our employees may have thought this was okay behavior.' [CEO Open letter on sexual harassment, N/A: <a href="https://documentcloud.org">documentcloud.org</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Response goes into detail: The response goes into further detail on actions taken: 'I can assure you that the people here care deeply about the employees in Chicago and have worked hard to improve the situation and continue to do so. During the past two years, Ford and the UAW have invested in 20,000 hours of employee training at the Chicago plants to reinforce a standard of mutual respect that is non-negotiable. In addition, we have significantly increased staffing at the plants to provide more oversight and quickly investigate any reported incidences of harassment or discrimination. We also entered into a settlement with the EEOC that I mentioned earlier, which establishes a panel of three independent experts to monitor personnel related matters in the plants such as harassment investigations, training and adherence to policies for up to five years. In addition, the settlement creates a fund of more than \$10 million to provide relief to those employees who have been subjected to harassing conduct'. [CEO Open letter on sexual harassment, N/A: <a href="https://documentcloud.org">documentcloud.org</a>]</li> </ul>  |
| E(1).2         | The Company has appropriate policies in place | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The Company has a policy against harassment and discrimination. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: The Company also encourages suppliers to adopt similar policies. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Policies address the specific rights in question</li> </ul>  |
| E(1).3         | The Company has taken appropriate action      | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages with affected stakeholders: The Company states the following: 'We require mandatory anti-harassment training to be taken by all of our employees by the end of 2020 and we are continuing to work with manufacturing facilities to enhance a culture around mutual respect and acceptance to help eliminate harassment and discrimination. We continue to partner with the Equal Employment Opportunity Commission (EEOC) at our Chicago area plants to execute the conciliation agreement reached with them in 2017. As part of the agreement, we are actively working with a panel of three independent monitors, none of whom work for Ford, to address the concerns raised in Chicago.' However, it is unclear how the Company has engaged with affected stakeholders, or the victims, in this case. [2020 UN Guiding Principles Reporting Framework Index, 2020: <a href="https://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Provides remedies to affected stakeholders: As of summer 2019, over 835 workers had received checks as a part of the settlement. Additionally, the CEO of the Company publicly apologized for the harassment. [Ford Workers Who Sued Over Sexual Harassment Face Setback, 23/8/2019: <a href="https://nytimes.com">nytimes.com</a> &amp; Ford Apologizes for Sexual Harassment at Chicago Factories, 21/12/2017: <a href="https://nytimes.com">nytimes.com</a>]</li> <li>• Met: Has reviewed management systems to prevent recurrence: In his letter, the CEO describes the following: 'In addition, we have significantly increased staffing at the plants to provide more oversight and quickly investigate any reported incidences of harassment or discrimination. We also entered into a settlement with the EEOC that I mentioned earlier, which establishes a panel of three independent experts to monitor personnel related matters in the plants such as harassment investigations, training and adherence to policies for up to five years.' [CEO Open letter on sexual harassment, N/A: <a href="https://documentcloud.org">documentcloud.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims: 33 women attempted to file a class-action lawsuit against the Company following the settlement, indicating that not all stakeholders are satisfied with the results of the settlement. [Ford Workers Who Sued Over Sexual Harassment Face Setback, 23/8/2019: <a href="https://nytimes.com">nytimes.com</a>]</li> <li>• Not met: Has improved systems and engaged affected stakeholders</li> </ul> |
| E(2).0         | Serious allegation No 2                       |                  | <ul style="list-style-type: none"> <li>• Headline: Mica mineral suppliers of CRRC MA, Panasonic, and others accused of using child laborers in Madagascar</li> </ul>  |

| Indicator Code | Indicator name                                       | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
|                |  |                  | <ul style="list-style-type: none"> <li>• Area: child labour</li> <li>• Story: On Monday, November 18, 2019, Dutch NGO Terre des Hommes released a report documenting the widespread use of child labor at mica mining sites in Madagascar. According to the human rights advocates at Terre des Hommes, at least 11,000 children between the ages of five and 17 are employed in quarrying and processing mica. Mining mica is dangerous work, with children complaining of aching muscles, headaches, dehydration, open sores, and respiratory problems, according to The Guardian. Mica is used in a range of common products, including cosmetics and paints, with 87 percent of the mineral mined in Madagascar shipped to China. NBC News points out that as Madagascar is one of the largest exporters of mica, then the material origin of mica used by companies that rely on the mineral, such as Fiat-Chrysler, is questionable.</li> <li>• Sources: [NBC News - 18/11/2019: <a href="http://nbcnews.com">nbcnews.com</a>][The Guardian - 21/11/19: <a href="http://theguardian.com">theguardian.com</a>][Africa Times - 20/11/19: <a href="http://africatimes.com">africatimes.com</a>][Terre des hommes - 14/11/19: <a href="http://assets.documentcloud.org">assets.documentcloud.org</a>]</li> </ul>   |
| E(2).1         | The Company has responded publicly to the allegation | 2                | <p>The individual elements of the assessment are met or not as follows:<br/>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response available: The Company discloses the following: 'In November 2019, NBC broadcast an investigative report on child labor in the mica mining industry of Madagascar, citing a study by international children's rights organization Terre des Hommes. NBC named Ford as a company that uses mica in its products. Our due diligence efforts to date do not suggest we source from affected mines, and additional investigations are ongoing.' [2020 UN Guiding Principles Reporting Framework Index, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Response goes into detail: See above [2020 UN Guiding Principles Reporting Framework Index, 2020: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul>  |
| E(2).2         | The Company has appropriate policies in place        | 1                | <p>The individual elements of the assessment are met or not as follows:<br/>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The Company has a policy against child labour. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: Suppliers are encouraged to use implement similar policies. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="http://corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Policies address the specific rights in question</li> </ul>  |
| E(2).3         | The Company has taken appropriate action             | 0                | <p>The individual elements of the assessment are met or not as follows:<br/>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages with affected stakeholders</li> <li>• Not met: Provides remedies to affected stakeholders</li> <li>• Not met: Has reviewed management systems to prevent recurrence</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Not met: Has improved systems and engaged affected stakeholders</li> </ul>   |
| E(3).0         | Serious allegation No 3                              |                  | <ul style="list-style-type: none"> <li>• Headline: Ex-Ford executives sued for collaborating with the 1970s dictatorship in Argentina</li> <li>• Area: Discrimination, freedom of association, freedom from torture etc</li> <li>• Story: On February 20, 2018, the public hearing began against two former Ford Motor Argentina executives in San Martin Federal Criminal Court in Argentina, for allegedly conspiring with security forces to target union workers at Ford's factory near Buenos Aires in 1976.</li> </ul> <p>According to the prosecution, the two former executives, Former Ford factory director Pedro Muller and ex-security manager Hector Francisco Jesus Sibilla, helped the military repression by providing names, ID numbers, pictures and home addresses of several of the Company's employee</p> <p>This collaboration allegedly facilitated the abduction of 24 Ford employees and union members. It is claimed that the victims endured hours of torture, electric shocks and interrogation on the factory premises in the suburb of General Pacheco, 40 km north of Buenos Aires, before being hauled off to military prisons, claimed the prosecution.</p> <p>This legal proceeding does not target the company, but only the two former officers. However, the victims expressed their intention to demonstrate the supposed complicity of Ford with the military dictatorship that ruled the country</p> |

| Indicator Code | Indicator name                                       | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
|                |  |                  | <p>from 1976 to 1983, and made more than 30,000 people disappear. The trial came to a close at the end of 2018. Muller and Sibilla were found guilty of human rights violations from 1976 to 1977, and were sentenced to 10 and 12 years in prison, respectively. Additionally, high-ranking military officer Santiago Omar Riveros was sentenced to 15 years for the same crime.</p> <ul style="list-style-type: none"> <li>• Sources: [-NY Times- 11/12/2018: <a href="https://www.nytimes.com">nytimes.com</a>][Justice Info - 01/04/2019: <a href="https://www.justiceinfo.net">justiceinfo.net</a>][Business-Human rights - 20/02/2018: <a href="https://www.business-humanrights.org">business-humanrights.org</a>][DW - 19/12/2017: <a href="https://www.dw.com">dw.com</a>]</li> </ul>  |
| E(3).1         | The Company has responded publicly to the allegation | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response available: According to the press, 'Ford said in a statement the company was "aware of the verdict about the supposed participation of ex-employees of the firm in events related to human rights in the '70s." The company added that it "always had an open and collaborative attitude with judicial authorities supplying all the available information." Officials at Ford declined to comment further, noting that the sentences can still be appealed.' [Argentina Convicts Ex-Ford Executives for Abuses During Dictatorship, 11/12/2018: <a href="https://www.nytimes.com">nytimes.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail</li> </ul>   |
| E(3).2         | The Company has appropriate policies in place        | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The Company's Code of Human Rights is consistent with both the ILO Core, which includes policy on discrimination and freedom of association, and the Universal Declaration of Human Rights, which covers freedom from torture. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="https://www.corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: Suppliers are encouraged to have similar policies. [Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility, 10/2013: <a href="https://www.corporate.ford.com">corporate.ford.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Policies address the specific rights in question</li> </ul> |
| E(3).3         | The Company has taken appropriate action             | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages with affected stakeholders</li> <li>• Not met: Provides remedies to affected stakeholders</li> <li>• Not met: Has reviewed management systems to prevent recurrence</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Not met: Has improved systems and engaged affected stakeholders</li> </ul>   |

## F. Transparency (10% of Total)

| Indicator Code | Indicator name                             | Score         | Explanation   |
|----------------|--|---------------|---|
| F.1            | Company willingness to publish information | 2.47 out of 4 | <p>Out of a total of 60 indicators assessed under sections A-D of the benchmark, Ford made data public that met one or more elements of the methodology in 37 cases, leading to a disclosure score of 2.47 out of 4 points.</p>   |
| F.2            | Recognised Reporting Initiatives           | 2 out of 2    | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Company reports on GRI: The Company discloses GRI Index [GRI Index 2020, 2020: <a href="https://www.corporate.ford.com">corporate.ford.com</a>]</li> <li>• Met: Company reports on UNGPRF: The Company discloses UNGP reporting framework index [UNGPRF Index SR 2020, 2020: <a href="https://www.corporate.ford.com">corporate.ford.com</a>]</li> </ul>   |
| F.3            | Key, High Quality Disclosures              | 0.4 out of 4  | <p>Ford met 1 of the 10 thresholds listed below and therefore gets 0.4 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> <li>• Met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> <p>Discussing challenges openly</p> |

| Indicator Code | Indicator name | Score | Explanation  |
|----------------|----------------|-------|--|
|                |                |       | <ul style="list-style-type: none"> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> Demonstrating a forward focus <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> <li>• Not met: Score 1 for D.5.1.a: Living wage (in own production or manufacturing operations)</li> <li>• Not met: Score 2 for D.5.7.a: Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)</li> </ul> |

## Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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