

Company Name Ford
Industry Automotive (Own Operations and Supply Chain)
Overall Score 39.0 out of 100

| Theme Score | Out of | For Theme |
|-------------|--------|---|
| 4.1 | 10 | A. Governance and Policies |
| 13.1 | 25 | B. Embedding Respect and Human Rights Due Diligence |
| 7.5 | 20 | C. Remedies and Grievance Mechanisms |
| 6.5 | 25 | D. Performance: Company Human Rights Practices |
| 7.8 | 20 | E. Performance: Responses to Serious Allegations |

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 2022 Methodology document for the sector concerned. 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 | 2 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: The Company states in its Code of Conduct: 'We are committed to protecting human rights and the environment'. [Code of Conduct (web), N/A: corporate.ford.com] Score 2 <ul style="list-style-type: none"> Met: Commitment to the UNGPs: The Company states in its Supplier Code: 'We are committed to respecting the United Nations (UN) Guiding Principles on Business and Human Rights and align our due diligence processes with them'. [Supplier Code, N/A: corporate.ford.com] |
| A.1.2.a | Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work | 2 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Company has a commitment to the ILO Core: The Company states: 'we are committed to respecting these widely accepted international human rights frameworks and charters: [...] The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work (1998)'. [We Are Committed to Protecting Human Rights and the Environment Policy, 2021: corporate.ford.com] Met: Company has an explicit commitment to All four ILO Core: The Company includes provisions to all ILO Core in its We are committed to protecting Human Rights and Environment Policy. With respect to freedom of association and collective bargaining, it indicates: 'We ... Recognize and respect employees' rights to freedom of association and collective bargaining. We will work with recognized employee representatives to promote the interests of employees. Even where there is no representation by unions, we provide opportunities for employee and |

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|----------------|--|------------------|--|
| | | | <p>external stakeholder concerns to be heard'. [We Are Committed to Protecting Human Rights and the Environment Policy, 2021: corporate.ford.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company expect suppliers to commit to ILO Core: See description below. The supplier is required to respect all ILO core areas. [Supplier Code, N/A: corporate.ford.com] • Met: Company explicitly list All four ILO for suppliers: The Company includes provisions to all ILO Core in its Supplier Code. With respect to freedom of association and collective bargaining, it indicates: 'Recognize and respect employees' rights to freedom of association and collective bargaining. Our suppliers are expected to: Work with recognized employee representatives to promote the interests of employees. Provide opportunities, even where there is no representation by unions, for employee and external stakeholder concerns to be heard without fear of intimidation, harassment, retaliation, or violence'. [Supplier Code, N/A: corporate.ford.com] |
| A.1.2.b | Commitment to respect the human rights of workers: Health and safety and working hours | 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"> • Met: Commitment to respect H&S of workers: The Company states: 'We [...] Commit to [...], providing a healthy and safe working environment' [We Are Committed to Protecting Human Rights and the Environment Policy, 2021: corporate.ford.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: In addition, the Company indicates: 'Comply with applicable laws regulating hours of work and provide fair and competitive compensation and benefits that meet or exceed legal requirements'. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. [We Are Committed to Protecting Human Rights and the Environment Policy, 2021: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The Company's Supplier Code reads: 'Provide a healthy and safe working environment. Our suppliers are required to: Provide a working environment that meets or exceeds local and national safety, occupational health, and fire safety legislation'. [Supplier Code, N/A: corporate.ford.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: In addition, its Supplier Code indicates: 'Comply with applicable laws regulating hours of work including overtime, where applicable, and provide fair and competitive compensation and benefits that meet or exceed legal requirements. Our suppliers must: Guarantee that all overtime is voluntary and ensure that work schedules and overtime are provided consistent with all applicable laws, including maximum hour and rest period laws. Agree upon overtime in advance and, where applicable, compensate overtime at a rate greater than regular hourly rates — or agree in advance to time of in lieu of a higher hourly rate'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Supplier Code, N/A: corporate.ford.com] |
| A.1.3.a.MO | Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (MO) | 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"> • Met: Responsible mineral sourcing: 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'. [Responsible Materials Sourcing Policy, 2021: corporate.ford.com] • Met: Based on OECD Guidance: As indicated above, the Company indicates: '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 |

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|----------------|---|------------------|---|
| | | | <p>3TG, including cobalt and mica.' [Responsible Materials Sourcing Policy, 2021: corporate.ford.com]</p> <ul style="list-style-type: none"> • Met: Requires suppliers to commit to responsible mineral sourcing: The Responsible Materials Sourcing Policy reads: 'We require our suppliers 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. Suppliers must conduct mineral due diligence in alignment with OECD Guidance'. [Responsible Materials Sourcing Policy, 2021: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commits to follow OECD Guidance for all minerals • Not Met: Suppliers expected to make similar requirements of their suppliers: Ford's Responsible Materials Sourcing Policy states 'Suppliers must conduct mineral due diligence in alignment with OECD Guidance'. The Supplier Code of Conduct references that suppliers will 'Provide information upon request to verify the materials in the products supplied to Ford have been sourced responsibly in accordance with Ford's Responsible Materials Sourcing Policy'. In the Supplier Code of Conduct under 'Supplier Obligations', suppliers must 'enforce a similar code of practice and require that subcontractors do the same' for the entire Code of Conduct'. However, it is not clear the Company expects suppliers to include a responsible sourcing policy statement to follow the OECD Guidance explicitly covering all minerals to their suppliers. [Responsible Materials Sourcing Policy, 2021: corporate.ford.com] & [Supplier Code, N/A: corporate.ford.com] |
| A.1.3.b.MO | Commitment to respect human rights particularly relevant to the industry – vulnerable groups (MO) | 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"> • Met: Women's rights: The Company indicates: we are committed to respecting these widely accepted international human rights frameworks and charters: [...] UN Women's Empowerment Principles. In addition, it is signatory of the Women's Empowerment Principles. [We Are Committed to Protecting Human Rights and the Environment Policy, 2021: corporate.ford.com] • Met: Expects suppliers to respect these rights: The We Are Committed to Protecting Human Rights and the Environment policy indicates: 'Commit to not tolerating harassment or discrimination of any form, supporting diversity and women's rights'. Also, 'Aligned with the UN Guiding Principles on Business and Human Rights, we are committed to respecting these widely accepted international human rights frameworks and charters: [...] UN Women's Empowerment Principles'. It indicates: 'We expect our suppliers, partners, and joint ventures (referred to as "business partners" in this policy) to adopt and enforce similar policies and extend them to their own supply chain'. [We Are Committed to Protecting Human Rights and the Environment Policy, 2021: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • 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: weps.org] • Met: Expecting suppliers to respect these rights: The We Are Committed to Protecting Human Rights and the Environment policy indicates: 'Commit to not tolerating harassment or discrimination of any form, supporting diversity and women's rights'. Also, 'Aligned with the UN Guiding Principles on Business and Human Rights, we are committed to respecting these widely accepted international human rights frameworks and charters: [...] UN Women's Empowerment Principles'. It indicates: 'We expect our suppliers, partners, and joint ventures (referred to as "business partners" in this policy) to adopt and enforce similar policies and extend them to their own supply chain'. [We Are Committed to Protecting Human Rights and the Environment Policy, 2021: corporate.ford.com] |
| A.1.4 | Commitment to remedy | 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"> • Not Met: The Company commits to remedy: The We Are Committed to Protecting Human Rights and the Environment policy states, 'We work to uphold and support human rights by following this policy to identify and monitor risks, remediate any non-compliance, [...] We strive to prevent, mitigate and remediate human rights and environmental impacts. To accomplish these goals, we: [...] Provide appropriate remedies when non-compliance occurs'. However, 'to work to' and 'to strive to' are not a formal statement of commitment according to CHRB wording criteria. Similar content is found in its Human Rights Report, however, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [We Are Committed to Protecting Human Rights and the |

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|----------------|--|------------------|---|
| | | | <p>Environment Policy, 2021: corporate.ford.com] & [2022 Human Rights Report, 2022: corporate.ford.com]</p> <ul style="list-style-type: none"> • Met: Company expect suppliers to make this commitment: The Supplier Code of Conduct states under 'Supplier Obligations' that suppliers must 'Report and remediate any non-compliance and, when issues are identified, transparently report their remediation progress'. [Supplier Code, N/A: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact: The Company indicates in its Supplier Code: 'We expect our suppliers to: [...] Provide appropriate remedies when non-compliance occurs'. However, no general requirement found to provide remediation for any adverse impact suppliers may cause in individuals, workers or communities. [Supplier Code, N/A: corporate.ford.com] |
| A.1.5 | Commitment to respect the rights of human rights defenders | 0 | <p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance attacks on HRs Defenders (HRDs): The Code of Conduct has a clear Anti-Harassment policy and it indicates that 'vendors and other visitors to our premises, are protected under this policy and are expected to abide by it'. In the Code of Conduct, under 'Speaking Up and Preventing Retaliation' section, 'Ford will support and protect anyone who raises a good-faith concern in connection with a potential violation of this Code, company policies, or the law. Ford strictly prohibits retaliation. You will never be discriminated against, disciplined, or penalized for having the courage to report a suspected violation of this Code, our policies, or the law in good faith, or for assisting with an investigation'. The Human Rights Report also notes: 'Ford does not tolerate violence, hate speech, harassment, or discrimination of any kind, including but not limited to gender, gender identity, race, color, religion, age, national origin, sexual orientation, disability, or veteran status. In addition, Ford does not tolerate any forms of violence, torture, cruel, inhumane, or degrading treatment'. However, no evidence found of a commitment to neither tolerate nor contribute to threats, intimidation and attacks (both physical and legal) specifically against human rights defenders. The indicator is looking for evidence that the Company will not retaliate against anyone who oppose a Company's operations or have raised questions about the Company's activities. Commitments are expected to be placed in Company policy documents. [Code of Conduct (web), N/A: corporate.ford.com] & [2022 Human Rights Report, 2022: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company expect suppliers to make this commitment • Not Met: Work with HRD to create safe and enabling environment |

A.2 Policy Commitments (5% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|-------------------------|------------------|---|
| A.2.1 | Commitment from the top | 0.5 | <p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The We Are Committed to Protecting Human Rights and the Environment policy indicates: 'the Sustainability and Innovation Committee of the Board of Directors provides oversight of this policy'. The Charter of the Sustainability, Innovation and Policy Committee of the Board of Directors states the duties of the committee, in relation to Sustainability, includes: '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'. [We Are Committed to Protecting Human Rights and the Environment Policy, 2021: corporate.ford.com] & [Charter of the Sustainability and Innovation Committee of the Board of Directors, 10/2021: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe HR expertise of Board member: The 2022 Proxy Statement discloses the Director Skills and Diversity Matrix and it includes Sustainability skills: 'Experience with environmental/climate change, talent and culture, and social responsibility initiatives enables us to address key shareholder concerns regarding sustainability and corporate responsibility'. However, although the Company indicates that various of its Board members have expertise on Sustainability, no further description found of specific human rights expertise of the board member or board committee tasked with that governance oversight. [2022 Proxy Statement, 05/2022: corporate.ford.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---------------------------------------|------------------|---|
| | | | <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO: Bill Ford, Executive Chair, and Jim Farley, President and Chief Executive Officer, issued a public statement Ford's Human Rights Report: 'Ford is publishing a Human Rights Report – a first for the company and for our industry. It will examine how our materials are sourced, where our products are manufactured, and how our labor standards measure up. Countries around the world are defining access to clean air and water as fundamental human rights. We at Ford agree – and are setting clear targets for reducing the global emissions of our entire supply chain'. Both the Executive Chair and President and Chief Executive Officer as Board members. However, this communication treats different topics and the quote included is the only part explicitly referring to human and labour rights. No further details found, setting human rights position or approach, including a discussion on why human rights matter to the business or challenges that the Company has faced in respecting them. [2022 Human Rights Report, 2022: corporate.ford.com] |
| A.2.2 | Board responsibility | 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"> • Met: Board/Committee review HRs strategy: The Company indicates, in its Sustainability Report 2020, 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 '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'. Finally, the 2022 Human Rights Report indicates: 'The Sustainability, Innovation and Policy Committee of the Board of Directors provides oversight of this policy. Human rights issues are brought to their attention for review and oversight as they arise. The Board also reviews the Modern Slavery Statement, our ESG strategy, as well as the Integrated Sustainability and Financial Report'. [Sustainability Report 2020, 2020: corporate.ford.com] & [Charter of the Sustainability and Innovation Committee of the Board of Directors, 10/2021: corporate.ford.com] • Not Met: Examples/trends re HR discussion in the last reporting period: 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'. However, this datapoint requires evidence for last reporting period. No further evidence found during last review. [UNGPRF Index SR 2020, 2020: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions: An organigram found in the 2022 Human Rights Report indicates that External Stakeholder Engagements of Sustainability Partnerships is directly connected the 'Board of Directors' and the 'VP, Chief Sustainability, Environment and Safety Officer'. However, it is not clear how the experiences of affected stakeholders or external human rights experts informed these discussions. [2022 Human Rights Report, 2022: corporate.ford.com] |
| A.2.3 | Incentives and performance management | 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"> • Not Met: Incentives for at least one board member: The 2021 CDP Climate indicates: 'Many corporate officers listed at media.ford.com have various environmental objectives, including increasing energy efficiency and reduction of CO2 emissions, included in their annual performance review objectives. Performance against these personal objectives influences overall performance ratings which determines the individual payouts under our incentive plans'. The 2022 Proxy Statement indicates: 'In May 2021, we laid out our ambitious Ford+ plan for growth and value creation to set us up for success as we transition into an EV world'. Also, 'The CTC Committee believes the 2021 payouts for the Named Executives are consistent with the performance-based nature of the Incentive |

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|----------------|-----------------------------------|------------------|---|
| | | | <p>Bonus Plan and hold executives accountable for their performance. The downward adjustment to final awards for corporate officers in order to create parity reflects the Company's commitment to Care for Each Other under the Ford+ plan'. Mr. Farley's [Board member] Incentive Bonus Plan is included in the Ford+ plan. However, it is not clear at least one board member has an incentive or performance management scheme linked to the Company's human rights policy commitment(s) or strategy. [2022 Proxy Statement, 05/2022: corporate.ford.com] & [2021 CDP Climate Change, 2021]</p> <ul style="list-style-type: none"> • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria |
| A.2.4 | Business model strategy and risks | 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"> • Not Met: Board process to review bussiness model and strategy: As for its Sustainability related functions, the Charter of the Sustainability, Innovation & Policy Committee of the Board of Directors notes: '[...] 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. [...]'. The 2022 Human Rights Report indicates: 'The Sustainability, Innovation and Policy Committee of the Board of Directors provides oversight of this policy [We Are Committed to Protecting Human Rights and the Environment policy]. Human rights issues are brought to their attention for review and oversight as they arise. The Board also reviews the Modern Slavery Statement, our ESG strategy, as well as the Integrated Sustainability and Financial Report'. However, no description found of the process it has in place to discuss and review its business model and strategy for inherent risks to human rights at board level or a board committee. [Charter of the Sustainability and Innovation Committee of the Board of Directors, 10/2021: corporate.ford.com] • Not Met: Describe frequency and triggers for reviewing: Regarding its meetings, the Charter of the Sustainability, Innovation & Policy Committee of the Board of Directors indicates: 'The Committee shall ordinarily meet at least three times annually, or more frequently as circumstances dictate'. However, although the Company indicates the frequency the Committee meets, it is not clear the frequency of and triggers for the Board to review its business model or strategy and potential impacts on human rights. [Charter of the Sustainability and Innovation Committee of the Board of Directors, 10/2021: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided: In its feedback to CHRB regarding this indicator, the Company made reference to the 2021 Modern Slavery and Human Trafficking Transparency Statement. However, no example found in the Statement of a action taken as a result of a discussion and review of its business model and strategy for inherent risks to human rights at board level or a board committee. The Company is expected to provide an example that reflects a change in organisation structure because of specific human rights inherent risk. [2021 Modern Slavery and Human Trafficking Transparency Statement, 29/03/2022: corporate.ford.com] |

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 | 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"> • Met: Score of 1 on A.1.2.a: See indicator A.1.2.a |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---------------------------------------|------------------|---|
| | | | <ul style="list-style-type: none"> • Met: Senior responsibility for HR implementation and decision making: The Human Rights Report indicates [regarding HR policy]: ‘The Vice President, Chief Sustainability, Environment and Safety Officer is responsible for interpreting and implementing this policy and reviewing with, as appropriate, the Vice President Global Manufacturing and Labor Affairs, Vice President Global Commodity Purchasing, Chief People and Employee Experiences Officer, and the General Counsel. Human rights issues are monitored throughout the year. Our Vice President Chief Sustainability, Environment and Safety Officer leads a monthly Global Sustainability & ESG Meeting, where a multi-disciplinary, executive-level team oversees our sustainability strategies and governance related to our Corporate Human Rights Policy’. [2022 Human Rights Report, 2022: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: Also: ‘The Global Sustainability team is responsible for day-to-day human rights leadership within our operations, working with Global Manufacturing and Labor Affairs, Global Purchasing, Human Resources, and the Office of the General Counsel. The Purchasing Supply Chain Sustainability team is responsible for day-to-day human rights, environmental and responsible material sourcing oversight and capacity building with our supply chain. Both teams work closely together to ensure corporate expectations are cascaded to suppliers’. [2022 Human Rights Report, 2022: corporate.ford.com] • Met: Day-to-day resources and expertise allocation in own ops: See above. It also indicates: ‘Responsibility for adhering to and upholding our Corporate Human Rights Policy lies with each of our employees, business partners, and suppliers. We have managers responsible for human rights issues in many parts of our organization, including Human Resources, People Matters, Purchasing, Sales, Health and Safety, Global Labor Strategy, Sustainability, and the Office of the General Counsel, in addition to our Global Business Units’. [2022 Human Rights Report, 2022: corporate.ford.com] • Met: Resources and expertise allocation in the supply chain: The 2022 Human Rights Report indicates: ‘The Purchasing Supply Chain Sustainability team is responsible for day-to-day human rights, environment, and responsible material sourcing oversight and capacity building within our supply chain. They work with the global Purchasing organization, the Global Sustainability team, and the Office of the General Counsel’. [2022 Human Rights Report, 2022: corporate.ford.com] |
| B.1.2 | Incentives and performance management | 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"> • Met: Senior manager incentives for human rights: It indicates: ‘Executives and managers throughout the company have human rights issues included in their annual objectives, such as responsible sourcing of minerals, air quality, climate change, and health and safety. As part of the company’s annual compensation process, performance assessment against objectives is one of the factors that determines individual compensation’. [2022 Human Rights Report, 2022: corporate.ford.com] • Met: At least one key HR risk, beyond employee H&S: The Company indicates that executives ‘have human rights issues included in their annual objectives such as responsible sourcing of minerals (...) and health and safety’. [2022 Human Rights Report, 2022: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public: The 2022 Proxy Statement indicates: ‘In May 2021, we laid out our ambitious Ford+ plan for growth and value creation to set us up for success as we transition into an EV world’. Also, ‘The CTC Committee believes the 2021 payouts for the Named Executives are consistent with the performance-based nature of the Incentive Bonus Plan and hold executives accountable for their performance. The downward adjustment to final awards for corporate officers in order to create parity reflects the Company’s commitment to Care for Each Other under the Ford+ plan’. Ford+ plan includes: ‘Ford Model e will deliver more than 2 million EVs annually by 2026 and design the next generation of breakthrough, industry-leading EVs and digital experiences; In partnership with our philanthropic arm, Ford Motor Company Fund (“Ford Fund”), made \$74.4 million in charitable contributions in 2021; [...] Ford Fund donated more than \$1.3 million to disaster relief efforts worldwide; [...] Together with Ford Fund, fulfilled our commitment to donate 120 million facemasks to at-risk individuals and organizations in all 50 states, opened a community vaccine center in Romania, and distributed food and medical kits to thousands of families in South America; Through numerous literacy, mentoring, workforce development, and educational initiatives, Ford Fund created opportunities for hundreds of thousands of under-resourced individuals around the world’. However, no description of the criteria |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| | | | <p>linking the senior manager(s)' remuneration to the company's human rights performance is also made public. [2022 Proxy Statement, 05/2022: corporate.ford.com]</p> <ul style="list-style-type: none"> • Not Met: Review of other senior management performance |
| B.1.3 | Integration with enterprise risk management | 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"> • Not Met: HR risks is integrated as part of enterprise risk system • Not Met: Provides an example <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment: The Company indicates that 'The Board of Directors has delegated responsibility for the oversight of specific areas of risk management to certain committees of the Board, with each Board committee reporting to the full Board following each committee meeting. [...] The Sustainability, Innovation and Policy Committee assists the Board of Directors in overseeing environmental and social sustainability risks'. The Charter for the Sustainability, Innovation and Policy Committee indicates one of the principal functions of the committees regarding sustainability: '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'. However, this indicator looks for a description of how the Company assesses the adequacy of the enterprise risk management system in managing human rights during the Company's last reporting year. The assessment has either to be overseen by the Board Audit Committee or conducted by an independent third party. [2022 Integrated Report, 2022: corporate.ford.com] & [Charter of the Sustainability and Innovation Committee of the Board of Directors, 10/2021: corporate.ford.com] |
| B.1.4.a | Communication /dissemination of policy commitment(s) to workers and external 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"> • Met: Score of 1 on A.1.2.a: See A.1.2. • 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 & 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: corporate.ford.com] & [UNGPRF Index SR 2020, 2020: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder: The Company indicates, in its feedback to CHRB, that its policy commitments are communicated to stakeholders through various means including: public availability through Ford's website, various reports and codes, stakeholder engagement. However, no description found of how it actively communicates its policy commitments to affected stakeholders, including local communities. • Not Met: How policy commitments are made accessible to audience: As indicated above, the Company conducts 'We also regularly conduct internal training on our new Supplier Code of Conduct and 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). [2021 Modern Slavery and HumanTrafficking Transparency Statement, 29/03/2022: corporate.ford.com] |
| B.1.4.b | Communication /dissemination of policy commitment(s) to business relationships | 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"> • Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Met: Requires suppliers to communicate policy requirements: The 2022 Human Rights Report indicates: 'Our suppliers are required to comply with our Supplier Code of Conduct through our Global Terms and Conditions (GT&Cs). The Supplier Code of Conduct outlines our requirements for supplier relationships in areas related to human rights, the environment, responsible material sourcing, responsible and lawful business practices and the associated implementation of these principles. It also requires that our suppliers enforce a similar code of |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <p>practice and require that subcontractors do the same, including those covering human rights'. The Company's indicates in its Terms and Conditions Section 3 that 'The contract between the Buyer and the Supplier for the purchase and sale of the Goods is the Purchase Order. The Purchase Order includes the Global Terms and Conditions'. The Section 36 of the same document states: 'The Supplier Code of Conduct applies to the supply of all Goods used on Buyer products and covers topics related to social and environmental responsibility, including the responsible sourcing of materials. The Supplier must comply with the Supplier Code of Conduct and demonstrate compliance when asked'. The Company also indicates in the UNGPFR index that "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&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'. [2022 Human Rights Report, 2022: corporate.ford.com] & [Terms and Conditions (web), 01/07/2021: corporate.ford.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The 2022 Human Rights Report indicates: 'Our suppliers are required to comply with our Supplier Code of Conduct through our Global Terms and Conditions (GT&Cs). The Supplier Code of Conduct outlines our requirements for supplier relationships in areas related to human rights, the environment, responsible material sourcing, responsible and lawful business practices and the associated implementation of these principles. It also requires that our suppliers enforce a similar code of practice and require that subcontractors do the same, including those covering human rights'. [2022 Human Rights Report, 2022: corporate.ford.com] & [Terms and Conditions (web), 01/07/2021: corporate.ford.com] • Met: Company requires suppliers to cascade down to their suppliers: As indicated above, the 2022 Human Rights Report indicates: 'Our suppliers are required to comply with our Supplier Code of Conduct through our Global Terms and Conditions (GT&Cs). The Supplier Code of Conduct outlines our requirements for supplier relationships in areas related to human rights, the environment, responsible material sourcing, responsible and lawful business practices and the associated implementation of these principles'. In the Supplier Code of Conduct under 'Supplier Obligations', suppliers must 'enforce a similar code of practice and require that subcontractors do the same' for the entire Code of Conduct'. The Global Terms & Conditions indicates, in its requirement 36.02, that: 'The Supplier must comply with the Supplier Code of Conduct and demonstrate compliance when asked. The Supplier shall enforce a similar code of practice and have its subcontractors do so'. The supplier code, which is contractual requires to 'identify and use subcontractors who adhere to the requirements of this Code and monitor subcontractor compliance'. [2022 Human Rights Report, 2022: corporate.ford.com] & [Terms and Conditions (web), 01/07/2021: corporate.ford.com] |
| B.1.5 | Training on Human Rights | 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"> • Met: Scores at least 1 on A.1.2.a: See indicator A.1.2. • Met: How workers are trained on HR policy commitments: The 2022 Human Rights Report indicates: 'expectations and principles are also contained within our Code of Conduct which covers topics related to human rights, the environment, responsible material sourcing, and lawful business practices (...). These expectations are reinforced in mandatory online training courses for all Ford salaried full-time, part-time and, agency workers, including an annual Code of Conduct course. These courses are periodically refreshed and reviewed to ensure the content remains relevant and appropriate. In addition, to provide our employees with the training needed, we use an interactive learning experience platform called "Degreed" (...). Degreed has become our main hub for learning, connecting employees to top of mind topics within Ford including issues such as Sustainability, Human Rights, Diversity, Equity, and Inclusion, and Employee Wellness'. [2022 Human Rights Report, 2022: corporate.ford.com] • Met: Trains relevant managers including procurement: In its MSA Statement, the Company indicates: 'We also regularly conduct internal training on our new Supplier Code of Conduct and 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'. [2021 Modern Slavery and HumanTrafficking Transparency Statement, |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <p>29/03/2022: corporate.ford.com] & [UNGPRF Index SR 2020, 2020: corporate.ford.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See indicator A.1.2. • Met: Meets both requirements under score 1: See above. • Met: Trains suppliers to meet company's HR commitment: The Company indicates: 'Through our memberships with the RBA and Drive Sustainability, we provide e-learning modules to our global suppliers 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'. [2022 Human Rights Report, 2022: corporate.ford.com] • Not Met: Disclose % trained: The Company indicates: 'Although we have been unable to conduct in person training with our global suppliers since the start of COVID-19, we were able to achieve the following supplier trainings and engagements: Direct engagement with 6 of our top 10 suppliers to review Ford's new Supplier Code of Conduct and sustainability reporting requirements, with nearly 100 attendees from both Ford Purchasing and supplier sales and sustainability teams. The remaining 4 top suppliers will be invited to participate in similar meetings in early 2022'. However, although the Company indicates proportions of its top suppliers trained, it is not clear the percentage of suppliers trained in general. [2022 Human Rights Report, 2022: corporate.ford.com] |
| B.1.6 | Monitoring and corrective actions | 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"> • Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The 2022 Human Rights Report states: 'Since 2004 we have assessed over 70 global manufacturing and joint venture facilities. In 2021, we began the process of expanding our Human Rights Risk Assessments to more of our global Ford and Joint Venture manufacturing facilities. We assessed 14 additional facilities in Europe, Mexico, South Africa, and the U.S. using RBA's online assessment tool'. As for its supply chain, the 2022 Integrated Report indicates: 'We conduct Sustainability Self-Assessment Questionnaires (SAQs) with our production suppliers. (...). We are in the process of scaling the SAQ to our entire production supply base with the goal of 100% response rate, enabling us to verify that supplier policies and practices meet the standard of our Supplier Code of Conduct. (...). Third-party social responsibility audits let suppliers know whether they meet their contractual obligations to Ford and our expectations while highlighting areas for improvement. As an RBA member, we use its Validated Audit Protocol (VAP) to assess labor, health and safety, management systems, ethics and environmental issues in our supply chain. (...) 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)'. [2022 Integrated Report, 2022: corporate.ford.com] & [2022 Human Rights Report, 2022: corporate.ford.com] • Met: Proportion of supply chain monitored: Regarding its Supplier Audits Conducted in 2021, the 2022 ESG Performance Data indicates the 'Approximate percentage of total supply base audited to date': 33 and the 'Percentage of total supply base audited in 2021': 0.6. [2022 ESG Data, 2022: corporate.ford.com] • Not Met: Describe how workers are involved in monitoring: The 2022 Human Rights Report indicates: 'Third-party social responsibility audits let suppliers know whether they meet their contractual obligations to Ford and our expectations while highlighting areas for improvement. As an RBA member, we use its Validated Audit Protocol (VAP) to assess labor, health and safety, management systems, ethics and environmental issues in our supply chain'. The Company, in its feedback to BHRB, makes reference to the webpage of the Validated Assessment Program (VAP), which indicates: 'A typical VAP onsite audit at a single manufacturing facility may last 2-5 days and includes a thorough document review, interviews with management and employees and a visual site survey'. However, although the Company indicates that workers are engaged during the monitoring process, the indicator looks for evidence of how the Company's own workers are involved in the monitoring process (which part they play in the monitoring process). No further evidence found. [2022 Human Rights Report, 2022: corporate.ford.com] & [Validated Assessment Program (VAP) (web), N/A: responsiblebusiness.org] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Met: Describes corrective action process: It indicates, that after the audits: 'For identified supplier non-conformances, each supplier is expected to develop a Corrective Action Plan (CAP) detailing root causes, planned remediation actions to address identified areas of concern and measures to correct non-conformances, as well as timing for resolutions. Such plans are regularly reviewed with in-region Supply Chain Sustainability personnel to ensure compliance aligned with Ford's expectations. We also review the overall status of supplier compliance with our commodity Purchasing teams. For more serious priority non-conformances, we review and monitor immediate containment plans and longer-term CAPs. Follow-up audits are scheduled to assess the results of CAPs, following a timeline based on the priority of non-conformances reported'. [2022 Human Rights Report, 2022: corporate.ford.com] • Not Met: Disclose findings and number of corrective action: Regarding suppliers' audits, it indicates: 'In our 2021 audits: 92% of sites audited submitted a CAP approved by a third party; 67% of audited sites required a follow-up audit, of which 31% completed a final closure audit so far; There was a 77% score improvement among sites audited; No supplier relationships were ended as a result of audit findings'. Also: 'The top three categories for supplier audit non-conformances, in 2021 were Management Systems, Labor, and Health and Safety. Specifically, the most frequent non-conformances from each of these three categories were: Supplier Responsibility: Supplier lacks the process to communicate and monitor compliance of their suppliers with the RBA Code of Conduct requirements. Working Hours: Supplier needs to establish adequate and effective policy, system and procedures to determine, communicate, record, manage, and control working hours, including overtime. Emergency Preparedness: Supplier requires systems so that potential emergency situations and events can be identified and assessed, and their impact minimized by implementing emergency plans and response procedures'. However, it is not clear the number of corrective action process as a result of the monitoring. [2022 Human Rights Report, 2022: corporate.ford.com] |
| B.1.7 | Engaging and terminating business relationships | 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"> • Not Met: HR affects selection of suppliers: Although the Company indicates that 'Our suppliers are required to comply with our Supplier Code of Conduct through our Global Terms and Conditions', which includes human rights expectations, it is not clear how human rights performance is taken into account in the identification and selection of potential business relationships, including suppliers. [2022 Human Rights Report, 2022: corporate.ford.com] • Met: HR affects on-going 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.' [UNGPFR Index SR 2020, 2020: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights: It indicates: 'In 2022, we are planning to integrate sustainability metrics into our production sourcing decisions to support supplier engagement and performance improvement'. However, no further description of the specific positive incentives to respect human rights currently in place found. [2022 Integrated Report, 2022: corporate.ford.com] • Met: Working with suppliers to meet HR requirements: 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'. [UNGPFR Index SR 2020, 2020: corporate.ford.com] |
| B.1.8 | Approach to engagement with affected 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"> • Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: In its GRI Index, the Company indicates: 'Ford engages at many levels, including interactions between many different |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <p>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, in the 2022 ESG Data, the Company discloses information about its stakeholders groups and the approach taken for engagement. It includes: communities, employees, suppliers and NGOs. [GRI Index 2020, 2020: corporate.ford.com] & [2022 ESG Data, 2022: corporate.ford.com]</p> <ul style="list-style-type: none"> • Met: Provides two examples of engagement with stakeholders: The 2022 Integrated Report states 'As in recent years, a stakeholder team selected by Ceres provided recommendations for our future reporting'. The Company discloses Ceres recommendations and the Company's responses to them. Additionally, it indicates how it engages with its employees: 'We foster dialogue with our employees at all levels of the business through channels including: our intranet site and website; corporate publications and reports; social media; webcasts and executive Q&A sessions with senior management; labor-management committee meetings; regular "Global Town Hall" meetings with direct updates from senior leaders; and Employee Resource Group (ERG) initiatives. We heard from thousands of employees throughout the year, giving us a significant insight into where we have done well and where we need to apply more focus. In 2021, 87% of employees surveyed, which were primarily salaried employees, stated that they have the flexibility to balance the needs of their work and personal life'. It also points out that it carries out an 'annual sentiment (PULSE) survey'. The 2022 Human Rights Report notes: 'This year, we also engaged select internal and external stakeholders in our 2022 human rights saliency assessment. We held employee listening sessions to understand the concerns of our people. For example, the "Dare to Care in the Living Room" series has brought insight and built empathy across multiple topics including the violence against Asian Americans and the experience of being women of color'. Moreover, 'We ensure ongoing compliance with the GFA principles through open dialogue with our union partners. Where compliance issues are identified, we collaborate on solutions to critical issues as they arise. Ford hosts an annual Global Information Sharing Forum (GISF), attended by union leaders, senior leaders at Ford, and union representatives. Topics discussed at the 2021 meeting included sustainability aspirations, Sustainable Financing Framework, carbon neutrality, Supplier Code of Conduct, and responsible material sourcing'. The Company has also got a SpeakUp grievance channel. It indicates that in its 2022 saliency assessment: 'we also engaged with Ford's key stakeholders and gathered their views on which human rights issues may be at risk of the most severe negative impact'. [2022 Integrated Report, 2022: corporate.ford.com] & [2022 Human Rights Report, 2022: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach |

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

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| B.2.1 | 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"> • 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'. See below further description. [Sustainability Report 2020, 2020: corporate.ford.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <ul style="list-style-type: none"> • Met: Identifying risks through relevant business relationships: 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: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: It indicates: 'We began with desk research to identify the full range of human rights that could potentially be negatively impacted by Ford's activities or through business relationships. This step included research to identify how Ford's peers address human rights issues and NGOs views on the most salient human rights issues in the automotive industry and beyond. We reviewed the lists of Ford's salient issues from the past few years to assess whether they were still a priority. We also engaged with Ford's key stakeholders and gathered their views on which human rights issues may be at risk of the most severe negative impact. Interviews were conducted with over 30 subject matter experts (SMEs) at Ford, two suppliers, two NGOs, and labor union and business experts from two multi-stakeholder organizations to understand their points of view on what salient human rights issues they encounter in their line of work and the processes in place to mitigate these risks. A pre-interview questionnaire was sent to collect data, which helped to prioritize the human rights issues. A more detailed survey was sent to a wider group of Ford employees and dealers to gather their views on the issues. (...) We conducted an internal workshop with internal and external SMEs to explore the key findings of the assessment, validate the findings, and check whether any considerations have been missed'. The Company has provided an additional source to this indicator, however key information was already in use. [2022 Human Rights Report, 2022: corporate.ford.com] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified |
| B.2.2 | Assessing human rights risks and impacts | 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"> • Met: Describe process for assessment of HR risks and discloses salient HR issues: 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'. Also, the 2022 Human Rights Report indicates that for its own corporate facilities and locations: 'Our 2022 saliency assessment continued to focus on potential higher-risk areas within Ford's operations and along our value chain where populations are particularly vulnerable. These include potential human rights risks associated with Ford global locations and operations in some regions such as the Americas, Africa, and Asia'. [UNGPRF Index SR 2020, 2020: corporate.ford.com] & [2022 Human Rights Report, 2022: corporate.ford.com] • Met: How process applies to supply chain: 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, |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <p>priority actions for Ford and emerging human rights issues; Workshops with internal and external stakeholders to validate and confirm the assessment findings'. Also, the 2022 Human Rights Report indicates: 'Our saliency assessment also highlighted impacts in our value chain specifically in manufacturing and raw material extraction in Africa, Europe, South America, Asia, and conflict affected and high-risk areas (CAHRAs), as well as arid and flood-prone regions'. [UNGPRF Index SR 2020, 2020: corporate.ford.com] & [2022 Human Rights Report, 2022: corporate.ford.com]</p> <ul style="list-style-type: none"> • Met: Public disclosure of the results of HR assessment: It indicates: 'Our Human Rights saliency assessment conducted in early 2022 identified the 10 salient human rights issues that apply throughout our business, our supply chain and other business partners in our value chain': Access to water and sanitation; Air quality; Child labor; Climate change; Equal and fair wages; Forced labor and ethical recruitment; Harassment and discrimination; Human trafficking; Occupational health, safety and wellbeing and Product safety and quality. [2022 Human Rights Report, 2022: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1: See above. • Met: How it involved affected stakeholders in the assessment: Regarding the 2022 saliency assessment, the 2022 Human Rights Report indicates: 'Interviews were conducted with over 30 subject matter experts (SMEs) at Ford, two suppliers, two NGOs, and labor union and business experts from two multi-stakeholder organizations to understand their points of view on what salient human rights issues they encounter in their line of work and the processes in place to mitigate these risks. A pre-interview questionnaire was sent to collect data, which helped to prioritize the human rights issues. A more detailed survey was sent to a wider group of Ford employees and dealers to gather their views on the issues'. [2022 Human Rights Report, 2022: corporate.ford.com] |
| B.2.3 | Integrating and acting on human rights risks and impact assessments | 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"> • 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: corporate.ford.com] & [UNGPRF Index SR 2020, 2020: corporate.ford.com] • Met: Description of how global system applies to 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: corporate.ford.com] • Met: Example of actions decided on at least 1 salient HR issues: 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: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1: See above. • Not Met: Involve stakeholders in decisions about actions: In the 2022 Human Rights Report, under each salient issue identified, the Company has an |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <p>"Engagement" section that details how it engages with stakeholders about the actions Ford is taking to address the salient issue. For example, in the case of child labor: 'We are working to address root causes of child labor by participating in multiple workgroups through RBA and its Responsible Labor Initiative (RLI) and Responsible Minerals Initiative (RMI), as well as the Automotive Industry Action Group (AIAG) work groups which focus on human rights with an emphasis on labor rights, including child labor. Ford's participation supports discussions around cross-industry audit protocol advancement, living wage, artisanal and small-scale mining, and definitions of recruitment fees. The AIAG Forced Labor Human Rights (FLHR) workgroup supports initiatives to help the automotive industry increase due diligence in the supply chain'. As for wages, 'Our employees have access through our website an overview of our compensation practices, Pay Equity Statement, Pay Transparency Policy, U.S. Pay Equity Analysis, and other compensation policies. We encourage employees to talk with their people leaders or People Matters team as needed. We are working to address root causes of wage inequity in our supply chain by participating in multiple workgroups through AIAG, RBA, and Responsible Labor Initiative (RLI)'. However, although the Company provides examples of engagement with various stakeholders, no description found of how it involves affected stakeholders in decisions about the actions to take in response to its salient human rights issues. [2022 Human Rights Report, 2022: corporate.ford.com]</p> |
| B.2.4 | Tracking 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"> • Not Met: System for tracking or monitor if actions taken are effective: It indicates: 'In 2021, our Salient Human Rights Governance team, with oversight from our director of Global Sustainability & ESG, continued to manage and track our action plans to prevent, manage, and remediate salient human rights issues. This process helps us track the effectiveness of our due diligence systems and performance, and identify opportunities to further improve our efforts to address human rights, including those that affect how we source materials responsibly'. However, no further description found of the system for tracking or monitoring the actions taken in response to human rights risks and impacts and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. [2022 Human Rights Report, 2022: corporate.ford.com] • Not Met: Lessons learnt from checking system 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). No further evidence found. [Sustainability Report 2020, 2020: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken: The 2022 Human Rights Report states: 'We continuously monitor whether people are harmed by our company's actions or decisions related to human rights issues, taking remedial action if harm is identified'. However, no description found of how it involves affected stakeholders in evaluation of whether the actions taken have been effective. [2022 Human Rights Report, 2022: corporate.ford.com] |
| B.2.5 | Communicating on human rights 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"> • Not Met: Provides two examples of comms with stakeholders: The 2022 Human Rights Report indicates: 'We ensure ongoing compliance with the GFA principles through open dialogue with our union partners. Where compliance issues are identified, we collaborate on solutions to critical issues as they arise. Ford hosts an annual Global Information Sharing Forum (GISF), attended by union leaders, senior leaders at Ford, and union representatives'. It also provides, in its feedback to CHRB various examples of media publications, issues found were related to gas leakage, COVID management, community projects and investments and |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|----------------|------------------|--|
| | | | <p>collaboration with battery supplier LG Chem to join forces in a blockchain project to monitor cobalt supplies from the Democratic Republic of Congo. However, no example found of specific human rights impacts raised by affected stakeholders and how it communicates with them. [2022 Human Rights Report, 2022: corporate.ford.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them |

C. Remedies and Grievance Mechanisms (20% 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 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • 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: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Channel is available in all appropriate languages and workers aware: Workers are made aware of the grievance channels through training as the 2022 Human Rights Report indicates: 'expectations and principles are also contained within our Code of Conduct which covers topics related to human rights, the environment, responsible material sourcing, and lawful business practices (...). These expectations are reinforced in mandatory online training courses for all Ford salaried full-time, part-time and, agency workers, including an annual Code of Conduct course'. The Code of Conduct contains explanation of the use of the grievance mechanisms. However it is not clear whether reporting channels are available in all relevant languages. The Company indicates in its feedback to CHRB that the Code of Conduct is available in 12 languages, however, no actual public evidence related to the languages of the grievance mechanism was found (i.e number of languages in which it is available or whether complainants can report grievances in their own local language). [2022 Human Rights Report, 2022: corporate.ford.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: The Supplier Code of Conduct indicates suppliers should: ' Provide grievance mechanisms and remedies. We expect our suppliers to: Provide operational-level grievance mechanisms that are accessible to employees, suppliers, and the public'. [Supplier Code, N/A: corporate.ford.com] • Met: Expect Suppliers to convey expectation to their own suppliers: The Supplier Code of Conduct indicates suppliers should: ' Provide grievance mechanisms and remedies. We expect our suppliers to: Provide operational-level grievance mechanisms that are accessible to employees, suppliers, and the public'. Also, the 2022 Human Rights Report indicates: 'Our suppliers are required to comply with our Supplier Code of Conduct through our Global Terms and Conditions (GT&Cs). (...) It also requires that our suppliers enforce a similar code of practice and require that subcontractors do the same, including those covering human rights'. [2022 Human Rights Report, 2022: corporate.ford.com] & [Supplier Code, N/A: corporate.ford.com] |
| C.2 | Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities | 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"> • Met: Grievance mechanism for community: The Company states that 'External stakeholders may report by emailing SpeakUp@ford.com'. [2021 Modern Slavery and HumanTrafficking Transparency Statement, 29/03/2022: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness: The Company indicates in its feedback to CHRB that the Code of Conduct is available in 12 languages, however, no further evidence related to the languages of the grievance mechanism found (or whether complainants can report in their local language). Moreover, it is not clear how all affected external stakeholders, at its own operations, are made aware of it. • Met: Communities access mechanism direct or through suppliers: The Supplier Code of Conduct indicates suppliers should: ' Provide grievance mechanisms and remedies. We expect our suppliers to: Provide operational-level grievance |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| | | | <p>mechanisms that are accessible to employees, suppliers, and the public'. [Supplier Code, N/A: corporate.ford.com]</p> <ul style="list-style-type: none"> Met: Expect supplier to convey expectation to their own suppliers: The Supplier Code of Conduct indicates suppliers should: 'Provide grievance mechanisms and remedies. We expect our suppliers to: Provide operational-level grievance mechanisms that are accessible to employees, suppliers, and the public'. Also, the 2022 Human Rights Report indicates: 'Our suppliers are required to comply with our Supplier Code of Conduct through our Global Terms and Conditions (GT&Cs). (...) It also requires that our suppliers enforce a similar code of practice and require that subcontractors do the same, including those covering human rights'. [Supplier Code, N/A: corporate.ford.com] & [2022 Human Rights Report, 2022: corporate.ford.com] |
| C.3 | Users are involved in the design and performance of the channel(s)/mechanism(s) | 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"> Not Met: Engages users to create or assess system Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Engages with potential or actual users on the improvement of the mechanism Not Met: Provides user engagement example (at least two) on improvement |
| C.4 | Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained | 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"> Not Met: Response timescales and how complainants will be informed: The Company discloses, in its 2022 Human Rights Report, a grievance mechanism chart, explaining 'What Happens After You Make a Report'. The Code of Conduct has comprehensive information on its grievance mechanism under the section 'Speaking Up and Preventing Retaliation'. It also contains the chart 'What Happens After You Make a Report'. However, no further description found of procedures for managing the complaints or concerns, including timescales for addressing the complaints or concerns and for informing the complainant. [2022 Human Rights Report, 2022: corporate.ford.com] & [Code of Conduct (web), N/A: corporate.ford.com] Not Met: Describe support (technical, financial, etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Describe types of outcome to complainant through use of mechanism 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: corporate.ford.com] |
| C.5 | Prohibition of retaliation for raising complaints or concerns | 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"> Met: Public statement prohibiting retaliation: It indicates: 'Ford prohibits retaliation against anyone for making a good-faith complaint or for cooperating in a company investigation of such complaints'. [2021 Modern Slavery and Human Trafficking Transparency Statement, 29/03/2022: corporate.ford.com] Met: Practical measures to prevent retaliation: Regarding its grievance channels, it indicates: 'Some of these mechanisms allow for anonymous and confidential reporting, including telephone hotlines, a dedicated email inbox, and our SpeakUp website'. [2021 Modern Slavery and Human Trafficking Transparency Statement, 29/03/2022: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Company indicate it will not retaliate against workers/stakeholders: The 2022 Human Rights Report indicates: 'Our Corporate Policies prohibit retaliation against anyone who in good faith reports a violation. Through these policies 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 [...]. Engage in violent acts or threats to the livelihoods, careers, or reputation of claimants or their lawyers'. However, no evidence found stating will not retaliate through firing or engaging in economic forms of retaliation against any workers or their representatives who have brought or tried to bring a case against it involving an allegation of human rights abuse. [2022 Human Rights Report, 2022: corporate.ford.com] Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Supplier Code of Conduct indicates suppliers should: 'Provide grievance |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| | | | mechanisms and remedies. We expect our suppliers to: Provide operational-level grievance mechanisms that are accessible to employees, suppliers, and the public. (...) Not retaliate against anyone who makes a good faith report of a violation of policy or law'. [Supplier Code, N/A: corporate.ford.com] |
| 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: Score 1 <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions Score 2 <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms: Regarding its grievance channels, the Company indicates: 'We cooperate with investigations'. However, it is not clear it sets out the process by which it cooperates with state-based non-judicial grievance mechanism on complaints brought against it. No further evidence found. [Code of Conduct (web), N/A: corporate.ford.com] • Not Met: Example of issue resolved (if applicable) |
| C.7 | Remedying adverse impacts | 1.5 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Describes how remedy has been provided: In its UNGPFR 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.' [UNGPFR Index SR 2020, 2020: corporate.ford.com] Score 2 <ul style="list-style-type: none"> • Met: Changes to systems, processes and practices to stop similar impact: 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'. [UNGPFR Index SR 2020, 2020: corporate.ford.com] • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts |
| C.8 | Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved: The 2022 ESG Data Book discloses figures for 'Number of confirmed harassment allegations' and the 'Percentage of confirmed harassment allegations by region'. However, no further information found including the number of grievances about human rights in general issues filed, addressed or resolved and outcomes achieved for its own workers, for external individuals and communities that may be adversely impacted by the Company. [2022 ESG Data, 2022: corporate.ford.com] • Not Met: How lessons from mechanism improve management system Score 2 <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders |

D. Performance: Company Human Rights Practices (25% 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"> • Not Met: Pays living wage or sets target date: The Company explains the definition of a living wage when commenting on 'emerging issues'. Moreover, 'Ford's commitment to fair and competitive compensation and benefits is reinforced by our Corporate Human Rights Policy. We are committed to equal pay for equal work. Employee compensation in each market should be fair and equitable, irrespective of gender, race, or similar personal characteristics. Equal pay for equal work applies to all forms of pay, including base salary, incentives, bonuses, and other forms of compensation. Ford shares a Pay Equity Statement with our employees to communicate Ford's commitment to this fundamental value. Ford complies with fair pay laws in all regions and countries and conducts ongoing review of our compensation data and practices globally to ensure they are fair, equitable, and free of bias due to race, gender, or any other similar characteristics'. However, it is not clear the Company has a time bound target for paying all workers a living wage or that it pays all workers a living wage. A living wage should include basic needs plus some discretionary for employees and his/her family and/or depends. [2022 Human Rights Report, 2022: corporate.ford.com] • Not Met: Describes how living wage determined: Also, 'We also utilize outside experts to conduct a thorough statistical analysis of salaried compensation throughout our workforce. If business-related explanations for the statistical outcomes are not identified, Ford makes salary adjustments to address these situations. Aside from periods of bargaining when wages are a critical topic of discussion, the company continuously responds to and works with the unions to ensure wages are equitable in the regional markets'. However, it is not clear how it determines a living wage for the regions where it operates, which includes involvement of relevant trade unions (or equivalent worker bodies where the rights to freedom of association and collective bargaining are restricted under law). [2022 Human Rights Report, 2022: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Paying living wage • Not Met: Definition of living wage reviewed with unions |
| 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"> • Not Met: Discloses living wage requirements in supplier code or contracts: The Supplier Code of Conduct indicates: 'Comply with applicable laws regulating hours of work including overtime, where applicable, and provide fair and competitive compensation and benefits that meet or exceed legal requirements'. However, it is not clear it has a timebound target for requiring its suppliers to pay all workers a living wage or that the company includes requirements to pay workers a living wage in its contractual arrangements with its suppliers or its supplier code of conduct. A living wage should cover basic needs and provide some discretionary for employees and his/her family and or depends. [Supplier Code, N/A: corporate.ford.com] • Not Met: Improving living wage practices of suppliers: It indicates: 'Our audits review a number of issues regarding wages and benefits, including timely payments, correct calculations of deductions or withholdings and payment to government, correct calculation and payment for regular and overtime hours, and that wages are not reduced for disciplinary reasons. Once identified, issues are resolved through corrective action plans'. However, it is not clear how it proactively works to support the payment of a living wage by its suppliers. [2022 Human Rights Report, 2022: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress |
| 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"> • Not Met: Avoids business model pressure on HRs (purchasing practices) • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| 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"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The 2022 Human Rights Report also indicates: 'Our Supply Chain Sustainability team conducts an annual risk assessment of nearly all of our approximately 4,500 Tier 1 supplier sites around the world'. However, although it indicates that it conducts annual risk assessments of practically all Tier 1 suppliers, it is not clear it identifies its indirect suppliers. Moreover, identification needs to include the product source (e.g. factories, manufacturing sites for components, etc.). [2022 Human Rights Report, 2022: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP 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: corporate.ford.com] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities |
| D.5.4.a | Prohibition of 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"> • Met: Does not use child labour: The Company indicates: 'Prohibit the use of child labor in any form. We will not employ anyone below the age of 15, unless as part of a government-authorized job training or apprenticeship program that clearly benefits the participants'. [We Are Committed to Protecting Human Rights and the Environment Policy, 2021: corporate.ford.com] • Met: Age verification of workers recruited: 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: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remediation if children identified: The 2022 Human Rights Report indicates: 'Our human rights risk assessments includes child labor. Our Supply Chain Sustainability and Supplier Diversity & Inclusion teams hosted our annual Driving A Better Tomorrow event, focusing this year on eliminating child labor. Representatives from Investor Advocates for Social Justice (IASJ), and the Oil and Mining Governance Center (OMGC) shared information about child labor risks and solutions in the supply chain. Presenters shared how Ford employees can play a role in eliminating child labor. Globally, 846 Ford Purchasing employees attended live, and a video recording of the event was provided to team members after the meeting'. However, it is not clear it how it develops, participates in or contributes to programmes for transition from employment to education, enabling children to attend and remain in education, if and when child labour is found in its operations and how it improves working conditions for young workers where relevant. [2022 Human Rights Report, 2022: corporate.ford.com] |
| D.5.4.b | Prohibition of child labour: Age verification and corrective actions (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"> • Not Met: Child Labour rules in codes or contracts: The Supplier Code of Conduct indicates: 'Do not use child labor in any form. Our suppliers must: Meet the minimum working age in any region where they operate while prohibiting employment of anyone below the age of 15, even if permitted under local law'. However, no further evidence found of child labour requirements, including verifying the age of workers recruited and remediation programmes, within its contractual arrangements with its suppliers or supplier code of conduct. [Supplier Code, N/A: corporate.ford.com] • 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: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| D.5.5.a | Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations) | 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"> • Met: Job seekers and workers do not pay recruitment fee: It indicates: 'we (...) Follow ethical recruiting practices, including but not limited to prohibiting the use of misleading or fraudulent practices while offering employment, the use of recruitment fees paid by employees'. [We Are Committed to Protecting Human Rights and the Environment Policy, 2021: corporate.ford.com] • Not Met: Commits to fully reimbursing if they have paid: It indicates: 'We do not require workers to pay work-related fees, and we pay all costs and charges involved in the recruitment process'. However, it is not clear the Company commits to fully reimbursing their own workers if they have been required to pay any fees or related costs during recruitment. [We Are Committed to Protecting Human Rights and the Environment Policy, 2021: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters: The We Are Committed to Protecting Human Rights and the Environment Policy indicates: 'We also conduct human rights risk assessment at our global manufacturing facilities, which includes assessment for forced labor and ethical recruiting. We conduct annual Code of Conduct training which includes our Corporate Human Rights Policy'. The 2022 Human Rights Report notes: 'The expansion of the RBA Self Assessment Questionnaire (SAQ) process, in line with the introduction of our updated Corporate Human Rights Policy, is used to assess the effectiveness of our human rights policies throughout our global manufacturing facilities'. However, although the RBA Self Assessment Questionnaire (SAQ) covers areas such as recruitment fees and reimbursement, it is not clear how it implements and monitors this practice particularly with employment agencies/labour brokers/recruitment intermediaries. [We Are Committed to Protecting Human Rights and the Environment Policy, 2021: corporate.ford.com] & [2022 Human Rights Report, 2022: corporate.ford.com] |
| D.5.5.b | Prohibition of forced labour: Recruitment fees and costs (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"> • Met: Debt and fees rules in codes or contracts: The Supplier Code of Conduct indicates suppliers should: 'Follow ethical recruiting practices. Our suppliers must not: (...) Ask employees to pay recruitment fees'. According to the Supplier Code of Conduct under 'Supplier Obligations', suppliers must 'enforce a similar code of practice and require that subcontractors do the same' for the entire Code of Conduct'. [Supplier Code, N/A: corporate.ford.com] • Met: How working with suppliers on debt & 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: corporate.ford.com] & [UNGPRF Index SR 2020, 2020: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made |
| D.5.5.c | Prohibition of forced labour: Wage practices (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"> • 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: corporate.ford.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <ul style="list-style-type: none"> • Met: Payslips show any legitimate deductions: 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: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters: The 2022 Human Rights Report indicates: 'We also conduct human rights risk assessment at our global manufacturing facilities, which includes assessment for forced labor and ethical recruiting'. However, it is not clear how implementation and monitoring of these practices is carried out particularly with employment agencies/labour brokers/recruitment intermediaries. The 2022 Human Rights Report also notes: 'The expansion of the RBA Self Assessment Questionnaire (SAQ) process, in line with the introduction of our updated Corporate Human Rights Policy, is used to assess the effectiveness of our human rights policies throughout our global manufacturing facilities'. The RBA Self Assessment Questionnaire includes questions on how employees are paid. However, no evidence was found that the Questionnaire checks on how it implements and monitors these practice particularly with employment agencies/labour brokers/recruitment intermediaries. No further evidence found. [We Are Committed to Protecting Human Rights and the Environment Policy, 2021: corporate.ford.com] & [RBA Self Assessment Questionnaire (SAQ), 01/2021: responsiblebusiness.org] |
| D.5.5.d | Prohibition of forced labour: Wage practices (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"> • Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts: The Supplier Code of Conduct indicates: 'Comply with applicable laws regulating hours of work including overtime, where applicable, and provide fair and competitive compensation and benefits that meet or exceed legal requirements'. However, no further evidence found that it requires the suppliers to pay workers in full and on time, in its contractual arrangements with suppliers or supplier code of conduct. [Supplier Code, N/A: corporate.ford.com] • Not Met: How working with supply chain to pay workers regularly and on time: The 2022 Human Rights Report indicates: 'Our audits review a number of issues regarding wages and benefits, including timely payments, correct calculations of deductions or withholdings and payment to government, correct calculation and payment for regular and overtime hours, and that wages are not reduced for disciplinary reasons. Once identified, issues are resolved through corrective action plans'. However, it is not clear how the Company proactively works with suppliers to help them improve their performance on this matter. [2022 Human Rights Report, 2022: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress |
| D.5.5.e | Prohibition of 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"> • 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: corporate.ford.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters: The 2022 Human Rights Report indicates: 'We also conduct human rights risk assessment at our global manufacturing facilities, which includes assessment for forced labor and ethical recruiting'. However, it is not clear how it implements and checks this practice in its operations, particularly with employment agencies/labour brokers/recruitment intermediaries. Moreover, it notes: 'The expansion of the RBA Self Assessment Questionnaire (SAQ) process, in line with the introduction of our updated Corporate Human Rights Policy, is used to assess the effectiveness of our human rights policies throughout our global manufacturing facilities'. The RBA Self Assessment Questionnaire includes questions on restrictions on workers. Once again, no evidence found that the Questionnaire checks on how it implements and monitors these practice particularly with employment agencies/labour brokers/recruitment intermediaries. No further evidence found. [2022 Human Rights Report, 2022: corporate.ford.com] & [RBA Self Assessment Questionnaire (SAQ), 01/2021: responsiblebusiness.org] |
| D.5.5.f | Prohibition of forced labour: Restrictions on workers (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"> • Met: Free movement rules in codes or contracts: The Supplier Code of Conduct indicates: 'Our suppliers must not: (...) Confiscate, destroy, conceal, and/or deny access to employee passports and other government-issued identity documents'. [Supplier Code, N/A: corporate.ford.com] • Not Met: How working with suppliers on free movement: 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: corporate.ford.com] & [2022 Human Rights Report, 2022: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress |
| D.5.6.a | Freedom of association and collective bargaining (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"> • Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: It indicates: 'Ford works with 42 unions globally, representing approximately 72 percent of our global workforce covered by collective bargaining agreements'. The significant percentage of workers covered by collective bargaining agreements is taken as a proxy for not intimidating or retaliating in practice. [2022 Integrated Report, 2022: corporate.ford.com] • Met: Discloses % total direct operations covered by collective CB agreements: It indicates: 'Ford has signed an International Framework Agreement (IFA) with IndustriALL Global Union that reiterates our commitments to our global labor community'. Also, 'Ford works with 42 unions globally, representing approximately 72 percent of our global workforce covered by collective bargaining agreements'. [2022 Integrated Report, 2022: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets both requirements under score 1: See above. |
| 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"> • Met: FoA & CB rules in codes or contracts: The Supplier Code of Conduct indicates: 'Recognize and respect employees' rights to freedom of association and collective bargaining. Our suppliers are expected to: Work with recognized employee representatives to promote the interests of employees. Provide opportunities, even where there is no representation by unions, for employee and external stakeholder concerns to be heard without fear of intimidation, harassment, retaliation, or violence'. [Supplier Code, N/A: corporate.ford.com] & [Global Terms and Conditions, 12/2007: performanceparts.ford.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <ul style="list-style-type: none"> • 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: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress |
| D.5.7.a | Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations) | 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"> • Not Met: Describes process to identify H&S risks and impacts: It indicates: 'Occupational health, safety, and wellbeing is a key strategic priority at Ford. We are committed to provide a healthy and safe working environment as stated in our Corporate Human Rights Policy. Also, we focus on wellbeing and mental health because of the impact this has on overall health and safety. We work diligently to achieve world-class levels of occupational safety year over year, through the application of policies and best practices. Our robust safety culture is supported by management and governance systems, effective communication, reporting and external benchmarking. We continually monitor and improve workplace safety through our internal Safety Operating System (SOS). We conduct regular communications and promotions on key safety issues to promote occupational health and safety. We have robust reporting processes, including all injuries, hazards, and near-misses, so we can ensure corrective actions are taken and prevention measures are implemented. We also share safety best practices via multi-industry groups, within and outside the automotive sector, and collaborate to address common issues. We are committed to supporting the unions we work with and the collective bargaining to ensure the health and safety of our union represented employees and locations. In 2021, we continued to focus on identifying potentially fatal events and high potential incidents involving our employees and contractors globally. From these incidents, global corrective actions are initiated and tracked to ensure that the identified causal factors are addressed. These corrective actions are tracked weekly to ensure timely completion'. However, although the Company explains its health and safety management system, no description found of the process it has in place to identify its health and safety risks and impacts. [2022 Human Rights Report, 2022: corporate.ford.com] • Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: In 2021, the 'Global lost time case rate' was 0.35. [2022 Human Rights Report, 2022: corporate.ford.com] • Met: Discloses Fatalities for last reporting period: The total fatalities in 2021: 3. [2022 Human Rights Report, 2022: corporate.ford.com] • Not Met: Occupational disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance: The Company indicates: 'Fatalities target is always zero'. However, no further targets for injury rates or lost days (or near miss frequency rate) and occupational disease rates for the last reporting period found. [2022 Integrated Report, 2022: corporate.ford.com] • Not Met: Met targets or explain why not or what is doing to improve management systems: There were three fatalities in the last reporting year. It also indicates: 'Due to these efforts, we have had very good success with reducing these types of events including two consecutive years without a workplace fatality in 2019 and 2020. Unfortunately, in 2021, we did experience three fatalities within our operations, two employees and one service contractor. Because each loss of life is unacceptable, cross-functional teams worked extensively to identify and implement controls to address the hazards which created these life-changing events'. No targets for injury rates or lost days (or near miss frequency rate) and occupational disease rates found [2022 Human Rights Report, 2022: corporate.ford.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| D.5.7.b | Health and safety: Fatalities, lost days, injury, occupational disease 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"> • Met: Sets out clear Health and Safety requirements: The Supplier Code of Conduct indicates: ' Provide a healthy and safe working environment. Our suppliers are required to: Provide a working environment that meets or exceeds local and national safety, occupational health, and fire safety legislation. Perform regular risk assessments and put in place corrective and preventative measures to minimize workplace hazards including, but not limited to mechanical, electrical, chemical, fire, and physical hazards. Provide regular health and safety training to workers and provide Personal Protective Equipment (PPE) at no cost to workers. Implement an effective fire safety management system and emergency plan at every supplier worksite. Safeguard employees and others by providing an appropriate number of clearly marked and unobstructed emergency exits and evacuation routes and provide first aid material and medical assistance/procedures to workers. Provide workers with clean toilet facilities, potable water, and sanitary eating facilities. Keep worker dormitories clean and safe, with appropriate emergency exits and reasonable entry and exit privileges. Encourage workers to openly raise health and safety concerns and provide safeguards against retaliation. In addition, Ford expects its suppliers to maintain a health and safety management system to limit worker exposure to hazards and promote continuous improvement of working conditions and occupational health and safety'. [Supplier Code, N/A: corporate.ford.com] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period: The Company has provided, in its feedback to CHRB, a source regarding this indicator. However, evidence found seems to be related to the Company's own operation rather than to its supply chain. • Not Met: Fatalities disclosures for lasting reporting period • Not Met: Occupational disease rates for the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Met: How working with suppliers on H&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: corporate.ford.com] • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provide analysis of trends in progress made |
| D.5.8.a | Women's rights (in own production or manufacturing operations) | 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"> • Met: Process to stop harassment and violence against women: 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: corporate.ford.com] & [Sustainability Report 2020, 2020: corporate.ford.com] • Not Met: Working conditions take account of gender |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <ul style="list-style-type: none"> • Not Met: Measures and steps to address gender pay gap at all levels of employment: Ford's commitment to fair and competitive compensation and benefits is reinforced by our Corporate Human Rights Policy. We are committed to equal pay for equal work. Employee compensation in each market should be fair and equitable, irrespective of gender, race, or similar personal characteristics. Equal pay for equal work applies to all forms of pay, including base salary, incentives, bonuses, and other forms of compensation. Ford shares a Pay Equity Statement with our employees to communicate Ford's commitment to this fundamental value. and conducts ongoing review of our compensation data and practices globally to ensure they are fair, equitable, and free of bias due to race, gender, or any other similar characteristics. We also utilize outside experts to conduct a thorough statistical analysis of salaried compensation throughout our workforce. (...) Ford is also taking positive steps to promote transparency by providing data on the current state of pay equity and progress that the company is making. Ford believes that open communication can only advance the cause of pay equity and equal employment opportunity. Our 2021 Global Salaried Gender Pay Ratio, defined as the weighted average ratio of average female salaries to average male salaries within peer groups1 worldwide, is 98.2%. Our U.S. Salaried Minority Pay Ratio, defined as the weighted average ratio of average minority salaries to average non-minority salaries within peer groups1 in the U.S., is 100.1%. Although our analyses show no indications of systemic pay bias, we will continually monitor our entire compensation structure to ensure that all employees are paid appropriately. In the U.K. we publish a Gender Pay Report that seeks to explain the difference in the pay of male and female employees, according to a series of measures as defined by U.K. Government. We have policies and practices in place to help deter unintentional inequities. These include: not asking for a candidate's salary history during the recruitment process, establishing standard starting salaries by degree and position for entry-level new hires, establishing promotional guidelines based on pre-promotional position within the salary range that allow lower paid employees to receive larger increases, and correcting specific pay relationships that are contributing to inequity. We are focused on creating a supportive work environment where women can thrive. For the fourth year in a row, Ford was included in the Bloomberg Gender-Equality Index (GEI)'. However, it is not clear how it measures gender pay gap. Moreover, it is not clear steps it takes to address any gender pay gap throughout all levels of employment beyond new hires. [2022 Human Rights Report, 2022: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meet all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap |
| D.5.8.b | Women's rights (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"> • Not Met: Women's rights in codes or contracts: The We Are Committed to Protecting Human Rights and the Environment Policy indicates: 'Commit to not tolerating harassment or discrimination of any form, supporting diversity and women's rights'. The Supplier Code of Conduct notes: 'Ford's We Are Committed to Protecting Human Rights and the Environment policy establishes how we conduct our business regarding human rights and the environment, including with our suppliers and business partners. Accordingly, this Supplier Code of Conduct ("Code") outlines both our requirements and our expectations for supplier relationships in areas related to human rights, the environment, responsible material sourcing, responsible and lawful business practices, and the associated implementation of these principles'. It also indicates: 'Do not tolerate harassment or discrimination of any kind. Our suppliers: Must not allow harassment or discrimination based upon (...) gender, (...) pregnancy, or other factors that may be covered by local law. Shall support diversity, promote gender equity, and base employment relationships on the principles of equal opportunity'. Although the We Are Committed to Protecting Human Rights and the Environment Policy mentions support to women's rights, it is not clear suppliers are contractually requested to comply with it and no evidence found that it requests suppliers to provide equal pay for equal work, introduce measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers in its contractual arrangements with suppliers or supplier code of conduct. [Supplier Code, N/A: corporate.ford.com] & [We Are Committed to Protecting Human Rights and the Environment Policy, 2021: corporate.ford.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <ul style="list-style-type: none"> • 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: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provide analysis of trends in progress made |
| D.5.9.a | Working hours (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"> • Not Met: Respects max hours, min breaks and rest periods in its own operations: It indicates: 'we (...) Comply with applicable laws regulating hours of work and provide fair and competitive compensation and benefits that meet or exceed legal requirements'. However, no reference to respecting applicable international standards concerning maximum hours and minimum breaks and rest periods in its own operations found. [We Are Committed to Protecting Human Rights and the Environment Policy, 2021: corporate.ford.com] • Not Met: Assesses ability to comply with its commitments when allocating work/targets <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How it implements and checks this in its operations |
| D.5.9.b | Working hours (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"> • Not Met: Working hours in codes or contracts: The Supplier Code of Conduct indicates: 'Comply with applicable laws regulating hours of work including overtime, where applicable, and provide fair and competitive compensation and benefits that meet or exceed legal requirements. Our suppliers must: Guarantee that all overtime is voluntary and ensure that work schedules and overtime are provided consistent with all applicable laws, including maximum hour and rest period laws. Agree upon overtime in advance and, where applicable, compensate overtime at a rate greater than regular hourly rates — or agree in advance to time of in lieu of a higher hourly rate'. However, no evidence found, in its Supplier Code of Conduct or contractual arrangements, of a supplier requirement to respect applicable international standards concerning maximum hours and minimum breaks and rest periods. [Supplier Code, N/A: corporate.ford.com] • 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: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by excessive working hours • Not Met: Provide analysis of trends in progress made |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| D.5.10.a | Responsible Mineral Sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains | 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"> • Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Responsible Material Sourcing Policy states: 'Suppliers must conduct mineral due diligence in alignment with OECD Guidance'. This policy is embedded in the supplier code, that states that suppliers have to 'provide information upon request to verify the materials in the products supplied to Ford have been sourced responsibly in accordance with Ford's Responsible Materials Sourcing Policy'. The supplier code also states that suppliers should 'Conduct due diligence and increase transparency related to raw materials, including materials sourced from conflict-affected or high-risk areas (CAHRAs). Raw material due diligence serves as an extension of Ford's due diligence implementation requirements. Our suppliers must: Identify risks and take appropriate measures to minimize such risks, including risks related to the direct or indirect financing of armed conflict, serious violations of human rights such as child labor, forced labor and slavery, unethical business conduct, or environmental damage. Provide information upon request to verify the materials in the products supplied to Ford have been sourced responsibly in accordance with Ford's Responsible Materials Sourcing Policy'. The Company's indicates in its Terms and Conditions Section 3 that 'The contract between the Buyer and the Supplier for the purchase and sale of the Goods is the Purchase Order. The Purchase Order includes the Global Terms and Conditions'. The Section 36 of the same document states: 'The Supplier Code of Conduct applies to the supply of all Goods used on Buyer products and covers topics related to social and environmental responsibility, including the responsible sourcing of materials. The Supplier must comply with the Supplier Code of Conduct and demonstrate compliance when asked'. [Supplier Code, N/A: corporate.ford.com] & [Terms and Conditions (web), 01/07/2021: corporate.ford.com] • 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: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • 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: corporate.ford.com] & [Terms and Conditions (web), 01/07/2021: corporate.ford.com] • Not Met: Contractual requirement covers all minerals |
| 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"> • Not Met: Risk identification and disclosure in line with OECD Guidance: The Company explains it process to 'Identify and Assess Risk in the Supply Chain. We reviewed in-scope supplier CMRTs [conflict minerals reporting template] for: Completion of all required reporting elements; Consistency between the expected 3TG metals reported as being intentionally added to the supplier's products and the metals reported in IMDS; Presence of a smelter and refiner list that includes expected metals based on IMDS reporting; Suppliers' sub-tier response rate reported from each CMRT supplier survey; Identification of smelters and refiners not participating in required 3rd party validation programs reported in suppliers' supply chain; Inclusion of conflict minerals policy that aligns to our conflict mineral expectations'. No evidence found, however, in relation to specific risks identified. [2021 Form-SD, 28/05/2021: s23.q4cdn.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <ul style="list-style-type: none"> • 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: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • 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: corporate.ford.com] • Not Met: Risk identification and disclosure covers all minerals |
| 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"> • 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 & Refiner RMAP lists, we immediately notified suppliers. We also directed the suppliers where to find the RMI "Conformant" and "Active" Smelter & 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: corporate.ford.com] • Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time: It indicates: 'Ford monitors the performance of our risk prevention measures through our business process review. We track and escalate supplier response rate and the quality of the data suppliers provide us. These reports are presented to our executive leadership who engage in escalations when necessary'. However, although the Company indicates it monitors and tracks performance, no further description found of how this process is carried out. The current evidence seems to refer to monitoring process, not clear about the specific mitigation/prevention measures. [2021 Form-SD, 28/05/2021: s23.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Suppliers and stakeholders engaged in risk management strategy: It indicates: 'We worked with over 50 in-scope suppliers providing parts containing gold components to complete additional due diligence if a non-conformant gold refiner was reported on company and product level reports. Through engaging with suppliers and educating them on the process to inquire with their tiered suppliers about sources of gold, we helped raise awareness and increase due diligence actions related to non-conformant gold refiners reported in our supply chain'. Also, 'Ford will continue its commitment to responsible 3TG sourcing by collaborating with industry groups and NGOs, engaging suppliers in continuous improvements to adopt best practices, and improving internal risk assessment and management systems'. However, it is not clear how it engages with suppliers and affected stakeholders to agree on its strategy for risk management. [2021 Form-SD, 28/05/2021: s23.q4cdn.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--------------------------------|------------------|--|
| D.5.11 | Responsible Materials Sourcing | 1 | <ul style="list-style-type: none"> • Not Met: Risk management and response processes cover all minerals <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Due diligence for raw materials in supplier code/contracts: The Supplier Code of Conduct indicates suppliers must: 'Conduct due diligence and increase transparency related to raw materials, including materials sourced from conflict-affected or high-risk areas (CAHRAs). Raw material due diligence serves as an extension of Ford's due diligence implementation requirements. Our suppliers must: Identify risks and take appropriate measures to minimize such risks, including risks related to the direct or indirect financing of armed conflict, serious violations of human rights such as child labor, forced labor and slavery, unethical business conduct, or environmental damage'. [Supplier Code, N/A: corporate.ford.com] • Not Met: Works with suppliers to build capacity in risk assessment and due diligence: The 2022 Human Rights Report indicates: 'Through our memberships with the RBA and Drive Sustainability, we provide e-learning modules to our global suppliers 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'. Although the Company indicates it provide capacity building for suppliers, it is not clear how it works with suppliers to contribute to building their capacity specifically in risk assessment and improving their due diligence performance in relation to raw materials sourcing. [2022 Human Rights Report, 2022: corporate.ford.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • 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). No further evidence found. [Sustainability Report 2020, 2020: corporate.ford.com] |

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"> • Area: Discrimination • Headline: Ford Motor settles class-action lawsuit on sexual harassment in the Chicago area for up to USD 10.1 million • 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. <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> <p>30 women went ahead with a class action lawsuit despite the 2017 settlement. In 2019 a judge ruled that they could not move forward as a class action as their individual experiences were too different to be summarily addressed in a class action. The women filed an amended class action in November 2021.</p> <p>[Chicago Tribune, 18/8/2017, "Ford settles claims of harassment in Chicago": digitaledition.chicagotribune.com] [UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION, 16/11/2021, "Second amended class action complaint for injunctive, monetary and class wide relief": courthousenews.com] [Vourthouse News Service, 16/11/2021, "Female Ford employee renews sexual harassment case against automaker": courthousenews.com] [New York Times, 23/08/2019, "Ford Workers Who Sued Over Sexual Harassment Face Setback": nytimes.com]</p> |
| 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"> • Met: Public response: In an open letter, CEO Jim Hackett wrote "Ford has been grappling with these allegations in Chicago for some time. There were 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: documentcloud.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: 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: documentcloud.org] |
| E(1).2 | The company has investigated and 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"> • Not Met: Engaged with 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 |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| | | | <p>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 in this case. [UNGPRF Index SR 2020, 2020: corporate.ford.com]</p> <ul style="list-style-type: none"> • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: 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: documentcloud.org] • Not Met: Stakeholder input to steps taken: There is no evidence suggesting that the views of affected stakeholders were taken into account in the improvement of the company policies. |
| E(1).3 | The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies) | 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"> • Met: Provided remedy: 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. [New York Times, 23/08/2019: nytimes.com] • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: 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. [New York Times, 23/08/2019: nytimes.com] • Met: Remedy delivered: The affected stakeholders have received the compensation • Not Met: Independent remedy process used |
| E(2).0 | Serious allegation No 2 | | <ul style="list-style-type: none"> • Area: Child labour • Headline: Mica mineral suppliers of CRRC MA, Panasonic, and others accused of using child laborers in Madagascar • 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. [NBC NEWS, 18/11/19, "Zone Rouge': An army of children toils in African mines How mica mined by kids in Madagascar ends up in products used by millions of Americans": nbcnews.com] [Terre des hommes, 14/11/19, "CHILD LABOUR IN MADAGASCAR'S MICA SECTOR": assets.documentcloud.org] [Africa Times, 20/11/19, "Report: Madagascar's mica mines rely on child labor": africatimes.com] [The Guardian, 21/11/19, "Children as young as five make up most of Madagascar's mica mining workforce": theguardian.com] |
| E(2).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"> • Met: Public response: In response to the NBC, a company spokesperson stated that Ford "aims to ensure that everything we make – or others make for us – is produced consistent with our own commitment to protecting human rights and in adherence with local law. We take our sustainability commitments seriously and seek to quickly address issues, if they occur. In addition, we engage in regular dialogue with key coating suppliers to monitor the responsible sourcing of mica. This due diligence includes mapping Tier 1 suppliers, reviewing third party audits of mica mines and participating in cross-industry investigations." Additionally, the Company discloses the following in its UN Guiding Principles Reporting Framework Index: "In November 2019, NBC broadcast an investigative report on child labor in |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| | | | <p>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." [NBC News - 18/11/2019: nbcnews.com] [UNGPRF Index SR 2020, 2020: corporate.ford.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The responses do not address the child labour allegation in detail. The company maintains a general terminology and does not comment on the specific conditions of child labour mentioned in the allegation. |
| E(2).2 | The Company has appropriate policies in place | 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"> • Not Met: Engaged with stakeholders • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: The company claims it has enhanced its due diligence in the sector of mica mining. Further, the company is participating in the RMI mica working group. [Integrated Sustainability and Financial Report 2021, 2021: media.ford.com] • Not Met: Stakeholder input to steps taken: There is no evidence suggesting this was informed by input from affected stakeholders. |
| E(2).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"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used |
| E(3).0 | Serious allegation No 3 | | <ul style="list-style-type: none"> • Area: Discrimination, freedom of association, freedom from torture, security of persons • Headline: Ex-Ford executives sued for collaborating with the 1970s dictatorship in Argentina • 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. <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 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. The court published its' official reasoning for the guilty verdict of the two managers on 01/04/2019.</p> <p>[NY Times, 11/12/2018, "Argentina Convicts Ex-Ford Executives for Abuses During Dictatorship": nytimes.com] [DW, 19/12/2017, "Argentina: Ex-Ford executives on trial for aiding 1970s dictatorship torture": dw.com] [Business and Human Rights Resource Centre, 20/02/2018, "Ford lawsuit (re Argentina)": business-humanrights.org] [Justice Info, 01/04/2019, "THE FORD TRIAL IN ARGENTINA, A WORKERS' VICTORY": justiceinfo.net]</p> |
| 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"> • Met: Public response: The company said in press statement that "Ford Argentina is not a party to the case, but is aware of the verdict on the alleged participation of |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <p>Ford Argentina employees in facts related to human rights issues in the '70s. Ford Argentina has always kept a collaborative and open attitude with authorities, providing all the available information requested to clarify this situation. Since the verdict is not final and it is subject to appeal before the Federal Court of Appeals, we would hold from making any further comment." [NY Times, 11/12/2018: nytimes.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The response does not address the details of the alleged events. |
| E(3).2 | The Company has appropriate policies in place | 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"> • Not Met: Engaged with stakeholders • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken |
| 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"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used |
| E(4).0 | Serious allegation No 4 | | <ul style="list-style-type: none"> • Area: Environmental rights; land rights <p>• Headline: Ford Motor among others accused of abuses of Aluminium supply chains</p> <p>• Story: On July 22, 2021, Human Rights Watch and Inclusive Development International said in a report that Automobile companies need to do more to address abuses in their aluminium supply chains and the bauxite mines they source from. Car manufacturers used nearly a fifth of all aluminium consumed worldwide in 2019 and they are forecast to double their aluminium consumption by 2050 as they transition to electric vehicles.</p> <p>In its report the Human Rights Watch and Inclusive Development International describes the global supply chains that connect car manufacturers to mines, refineries, and smelters from countries including Guinea, Ghana, Brazil, China, Malaysia, and Australia. Based on meetings and correspondence with nine major car companies – Ford among others (BMW, Daimler, Renault, General Motors, Groupe PSA (now part of Stellantis), Toyota, Volkswagen, and Volvo) – Human Rights Watch and Inclusive Development International assessed how the auto industry addresses the human rights impacts of aluminium production, from the destruction of farmland and damage to water sources caused by mines and refineries to the significant carbon emissions from aluminium smelting. Although car companies' knowledge of aluminium supply chains varies, none of the nine companies that responded to Human Rights Watch and Inclusive Development International had, prior to being contacted for this report, mapped their aluminium supply chain to understand the human rights risks within it.</p> <p>The report also alleged despite many of the world's leading car companies have publicly committed to addressing human rights abuses in their supply chains, they have done little to evaluate and address the human rights impact of aluminium production. They have instead prioritized supply chain due diligence for other materials central to electric vehicles, such as the cobalt needed for electric batteries. Because they involve surface level mining, bauxite mines take up a large area, often destroying farmland that underpins the livelihoods of local communities. Bauxite mines can also have a devastating impact on rivers, streams, and groundwater sources that communities rely upon for household consumption and irrigation.</p> <p>[Human Rights Watch, 22/07/2021, "Aluminum: The Car Industry's Blind Spot": hrw.org]</p> |
| E(4).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"> • Met: Public response: The Human Rights Watch and Inclusive Development International report states that the two organisations met with a representative from Ford and received a letter from Ford in response to their questions. The |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| | | | <p>company also made a brief public statement to correct content in the report. [Human Rights Watch, 22/07/2021, "Aluminum: The Car Industry's Blind Spot": hrw.org] [Ford, 09/09/2021, "Correction to Human Rights Watch and Inclusive Development International": corporate.ford.com] [Ford, 28/05/2021, "Response to Human Rights Watch and Unclusive Development International": corporate.ford.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The company did not directly address the allegations presented in the Human Rights Watch report. It's statements remain vague and general. <p>The company provided feedback for this indicator mentioning its Human Rights Report and HRW Response. Ford states: "In 2021, in order to better identify sources and assess ESG performance of suppliers who use significant amounts of steel, aluminium, palladium, and rare earth elements, we requested suppliers to identify processors and mines, complete the RMI Risk Readiness Assessment, and commit to engaging with IRMA in 2022. We will continue to follow up and engage suppliers to complete requests". However, the response did not address the allegation. [Ford, 09/09/2021, "Correction to Human Rights Watch and Inclusive Development International": corporate.ford.com] [Ford, 28/05/2021, "Response to Human Rights Watch and Unclusive Development International": corporate.ford.com] [2021 Human Rights Report, 2021: corporate.ford.com]</p> |
| E(4).2 | The Company has appropriate policies in place | 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"> • Not Met: Engaged with stakeholders: Although Ford's Supplier Code of Conduct and Sustainability Report states that the company requires its suppliers to engage with affected stakeholders, there is no evidence that Ford itself has directly engaged with affected stakeholders. [Supplier Code, N/A: corporate.ford.com] & [Sustainability Report 2020, 2020: corporate.ford.com] • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: Although Ford has its Supplier Code of Conduct, there is no clear evidence that the allegations made in the HRW report have informed this code or any of the company's programs related to ethical sourcing of aluminium. <p>The company's 2022 Human Rights Report states, "In 2021, we also worked with key aluminium suppliers to conduct due diligence to address mining concerns of bauxite. We raised these issues with RMI and IRMA to better understand actions the industry can take to address mining concerns." However, there is no information available on what this process entailed or whether the company engaged with affected stakeholders or their legitimate representatives to understand the cause of the impacts alleged.</p> <p>Drive Sustainability, a coalition of 11 car companies that includes BMW, Daimler, Ford, Toyota, Volkswagen, and Volvo, in May 2021 initiated a project to assess the human rights risks inherent in aluminium supply chains and those of nine other raw materials, which it said could presage collective action by the auto industry to drive up standards in supply chains. [Supplier Code, N/A: corporate.ford.com] & [2022 Human Rights Report, 2022: corporate.ford.com]</p> <ul style="list-style-type: none"> • Not Met: Stakeholder input to steps taken: The company's 2022 Human Rights Report states, "In 2021, we also worked with key aluminium suppliers to conduct due diligence to address mining concerns of bauxite. We raised these issues with RMI and IRMA to better understand actions the industry can take to address mining concerns." However, there is no information available on what this process entailed or whether the company engaged with affected stakeholders or their legitimate representatives to understand the cause of the impacts alleged. [2022 Human Rights Report, 2022: corporate.ford.com] |
| E(4).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"> • Not Met: Provided remedy: One of the company's bauxite suppliers reach an agreement with Guinean communities in 2021 through a process of mediation. The agreement includes remedies for past damage caused by the supplier among other things. However, there is no clear evidence that the company used its leverage to move the supplier to participate in the mediation or to agree to the remedy. |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <p>The company provided feedback for this indicator mentioning the Joint Statement. However, it was found not relevant for the assessment because the document is not related to the allegation. [Compliance Advisor Ombudsman (CAO), 21/10/2021, "Joint Statement": cao-ombudsman.org] [Inclusive development Internationa, "Guinea: Demanding a fair deal for communities from Alcoa-Rio Tinto bauxite mine": inclusivedevelopment.net]</p> <ul style="list-style-type: none"> • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: The company provided feedback for this indicator mentioning the Joint Statement. However, it was found not relevant for the assessment because the document is not related to the allegation. • Not Met: Remedy delivered: The company provided feedback for this indicator mentioning the Joint Statement. However, it was found not relevant for the assessment because the document is not related to the allegation. • Not Met: Independent remedy process used |
| E(5).0 | Serious allegation No 5 | | <ul style="list-style-type: none"> • Area: Health & Safety • Headline: Flat Rock residents weigh evacuation after health official says gas leak no 'imminent danger' • Story: Nine homes, a business and a charter school have been given order to evacuate following the discovery of a gas leak at a the Ford Motor Company Flat Rock Assembly Plant. Several other residents were asked to voluntarily leave their homes out of caution. <p>The leak of an estimated 1.400 gallons of unleaded gasoline came from a storage tank at the plant. It did not affect drinking water as the leak went into the sewer system, which is separate from the water system.</p> <p>High levels of benzene, a substance contained in gasoline, can still affect the health negatively, causing headaches, dizziness, weakness, a rapid heart rate, among other symptoms. Long-term exposure can affect the blood cell count and weaken the immune system.</p> <p>[The Detroit News, 05/09/2021, "Flat Rock residents weigh evacuation after health official says gas leak no 'imminent danger'": detroitnews.com] [Detroit Free Press, 25/09/2021, "Ford sending \$500 checks to Flat Rock households evacuated from gas leak": freep.com] [Detroit Free Press, 13/09/2021, "Ford: Gas leak at Flat Rock Assembly Plant fixed, Mustang production to resume": freep.com] [ABC NEWS, 05/09/2021, "Gas leak that likely originated at Ford plant prompts evacuation recommendations in Michigan: Officials": abcnews.go.com]</p> |
| E(5).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"> • Met: Public response: In response to the allegation, T.R. Reid, a Ford spokesman said to The Detroit News: "The leak came from a gasoline storage tank at the assembly plant, which builds Mustangs and dates to 1987. The tank is used to fuel the cars after they are built". <p>Bob Holycross, Ford vice president of sustainability, said the company believed the leak was contained to Ford's property in the city, but further investigation determined "the scale of the fuel leak was much larger and that Ford is the source of the problem in Flat Rock." [The Detroit News, 05/09/2021: detroitnews.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: "What originally looked like a small leak in a pipe that carries gasoline used to fuel vehicles built at the plant" on Wednesday afternoon, Bob Holycross, vice president of sustainability, environment and safety engineering for Ford, said in a statement Friday. "We shut down the fuel pipe, called in experts to remove gas from a containment tank and the primary storage tank, and notified officials of what we found," Holycross said. "We believed then that the leak was contained to our property." He added that further investigation determined "the scale of the fuel leak was much larger and that Ford is the source of the problem in Flat Rock." [ABC NEWS, 05/09/2021: abcnews.go.com] |
| E(5).2 | The Company has appropriate policies in place | 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"> • Met: Engaged with stakeholders: The company states that it engaged with civil society organisations. However, as there is no indication that those have not been mandated by the Flat Rock residents these organisations cannot be considered legitimate representatives. |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| | | | <p>Further, the company also participated in a Town Hall meeting with the affected stakeholders.</p> <ul style="list-style-type: none"> • Not Met: Identified cause: Bob Holycross, Ford vice president of sustainability, said the company believed the leak was contained to Ford's property in the city, but further investigation determined "the scale of the fuel leak was much larger and that Ford is the source of the problem in Flat Rock." There is, however, no information given by the company as to how the leak developed in the first place. <p>The company provided feedback for this indicator mentioning a document called "Published Quote of Statement". However, the company's feedback is not available in the link's source. So, considering it, the company can not have a point in this assessment. [The Detroit News, 05/09/2021: detroitnews.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: "Ford repaired the leaking pipe and removed the gasoline from the tank so no more gasoline can escape," Kelli Felker, Ford global manufacturing and labor communications manager, told the Free Press. "In addition, we are decommissioning all underground gasoline piping and replacing with aboveground piping. [...] We are also evaluating whether any additional changes are needed in our system and operations to remove the potential for this leak path from occurring again." [Detroit Free Press, 13/09/2021: freep.com] • Not Met: Stakeholder input to steps taken: There is no evidence suggesting that the views of affected stakeholders were taken into account in the improvement of the company policies. <p>The company provided feedback for this indicator mentioning a document called "Published Quote of Statement". However, the company's feedback is not available in the link's source. So, considering it, the company can not have a point in this assessment.</p> |
| E(5).3 | The Company has taken 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"> • Met: Provided remedy: Ford Motor Co. will send \$500 checks to every household that was evacuated from a southeastern Michigan city because of a gasoline leak from the automaker's plant into the community's sewer system, representatives said. <p>The checks would total \$600,000 for 1,200 displaced households, The Detroit News reported. [Detroit Free Press, 25/09/2021: freep.com]</p> <ul style="list-style-type: none"> • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedy satisfactory to stakeholders: There is no evidence suggesting that the remedy was not satisfactory to stakeholders. • Met: Remedy delivered: There is no evidence suggesting that the remedy was not delivered. • Not Met: Independent remedy process used |

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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