



# Ford Motor Company Global Modern Slavery and Human Trafficking Transparency Statement for the Financial Year Ending on December 31, 2022

As Ford aims to take leadership of the electric revolution, our goal is to do so in a way that creates positive impacts on people and the environment. As a company, our future centers on a purpose bigger than building vehicles. We are helping to build a better world, where every person is free to move and pursue their dreams. We are committed to making our purpose evident in every part of our business, from the way we source our materials, to the vehicles we create, to the services we provide, to the interactions we have with our customers, employees, and communities. It not only guides our vision of the future but informs the steps we take to build it. Respecting human rights, supporting equality, providing fair and equal wages, and creating a safe place to work - and ensuring our suppliers and their suppliers do the same - are some of the ways in which we can achieve our Purpose. Ford+, our global strategy for growth, combines foundational strengths and evolving new capabilities to create superior experiences for customers – and profitable growth for Ford that’s good for people, good for the environment and good for our business.

This statement is made pursuant to reporting requirements of applicable modern slavery and transparency acts<sup>1</sup> which require qualifying businesses to provide disclosures related to steps being taken to ensure that slavery and human trafficking are not taking place in our supply chains or any other part of our business. In this pursuit, Ford supports transparency from businesses regarding efforts to deter forced labor, slavery and human trafficking in our operations and supply chain. For a summary of our positive impact see “How We Create Sustainable Value” in our [Integrated Sustainability and Financial Report](#).

This statement provides information required for these disclosures and provides guidance to other stakeholders of the Ford Motor Company, subsidiaries, and affiliates. Unless otherwise specified, reference to “Ford”, “we”, “us”, “Company” or “our” refer to Ford Motor Company, subsidiaries, and affiliates.<sup>2,3</sup>

## Ford Motor Company Overview

Ford Motor Company (NYSE: F) is a global company based in Dearborn, Michigan, that is committed to helping build a better world, where every person is free to move and pursue their dreams. The company’s Ford+ plan for growth and value creation combines existing strengths, new capabilities, and always-on relationships with customers to enrich experiences for and deepen the loyalty of those customers. Ford develops and delivers innovative, must-have Ford trucks, sport utility vehicles, commercial vans and cars and Lincoln luxury vehicles, as well as connected services. Additionally, Ford is establishing leadership positions in mobility solutions, including self-driving technology, and provides financial services through Ford Motor Credit Company. Ford employs about 176,000 people worldwide. For further details on Ford Motor Company’s business operations, see Ford’s

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<sup>1</sup> Includes the Australia Modern Slavery Act, California Transparency in Supply Chains Act, and United Kingdom Modern Slavery Act.  
<sup>2</sup> Includes the Ford Motor Company of Australia Pty Ltd, Ford Technologies Limited, Ford Motor Company Limited, Ford Retail Limited, and Ford Credit Europe.  
<sup>3</sup> Ford Motor Company of Australia Pty Ltd does not own or control any other entities.



[Integrated Sustainability and Financial Report.](#)

Our products rely on the skills of these employees and the support of our suppliers. Everything we make – or that others make for us – needs to be produced in a manner that is consistent with local laws and our own commitment to protect the environment and respect human rights, as embodied in our [We Are Committed to Protecting Human Rights and the Environment](#) policy.

The supply chain in our industry is complex, with many tiers between material suppliers and manufacturers such as Ford. Our supply chain includes component suppliers as well as indirect suppliers of facilities, equipment, materials, and services.

Operations	Production Suppliers	Indirect Suppliers
\$98 billion global production spend	1600+ Tier 1 supplier companies	24,000+ supplier companies
44 Ford-owned assembly and powertrain manufacturing sites*	62 countries	800 commodities
	4,500+ supplier sites	
	190,000+ parts manufactured	
	500+ commodities sourced	

\* Does not include unconsolidated joint ventures



Ford has outlined specific conduct guidelines for our business partners and suppliers since 2003 and has a formal Supplier Code of Conduct that applies clear expectations related to respecting human rights, protecting the environment, responsible material sourcing and lawful business practices throughout our value chain. We are working with our suppliers in a variety of ways to achieve these requirements.

**Public Commitments to Human Rights**

In 2022, Ford issued our first Human Rights Report to share the company’s commitment and approach to human rights, the salient issues we have identified, and how they are managed. Ford was also the first major U.S. automaker to sign the [Action Pledge for the United Nations’ International Year for the Elimination of Child Labour](#), which describes the actions companies are taking to eliminate child labor. In signing the pledge, Ford committed to respect human rights by extending policies and due diligence processes outlined in the company’s human rights policy that prohibit child labor to its suppliers and business partners. As the Chair of the Board of Directors and member of the Responsible Business Alliance and other multi-stakeholder groups, we encourage others across industries to adopt best practices to end child labor and address the root causes.

We are also signatories to the:

- [UN Sustainable Development Goals \(SDGs\)](#)
- [UN Global Compact](#)
- [UN Women’s Empowerment Principles](#)
- [CEO Action for Diversity & Inclusion Pledge](#)



## Modern Slavery & Human Trafficking Policies

**Our commitment to protecting and respecting human rights is embodied in our *We Are Committed to Protecting Human Rights and the Environment* policy**, which addresses key workplace issues commonly associated with modern slavery, including but not limited to child labor, forced labor, human trafficking, fair and equal wages, and freedom of association and collective bargaining rights. This policy applies to all of Ford's global operations.

Ford's policy prohibits forced or compulsory labor and requires our business, including all suppliers, comply with ethical recruitment principles. These include prohibiting the use of misleading or fraudulent practices while offering employment, the use of recruitment fees, and the confiscating, destroying, concealing, and/or denying access to employee identity documents.

**Protecting rights to freedom of association and collective bargaining is also vital in preventing modern slavery and human trafficking in our workforce.** In alignment with our *We Are Committed to Protecting Human Rights and the Environment* policy and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, Ford works with approximately 42 different unions globally, representing approximately 69% of our global workforce. Substantially all the hourly employees in our global Automotive operations are represented by unions and covered by collective bargaining agreements.

Ford hosts an annual Global Information Sharing Forum (GISF), attended by global union leaders, senior leaders at Ford, and union representatives. Topics at the 2022 meeting included an overview of our Sustainability aspirations, salient human rights issues, European legislation due diligence, Battery Mining audit process, and other Sustainability topics.

## Supplier Contracts & Policies

In addition to supporting human rights within our own operations, we are committed to ensuring our suppliers do the same. Ford's Supplier Code of Conduct ("Supplier 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 implementation of associated due diligence principles.

The Supplier Code applies to Ford's supplier community. Our requirements and expectations reflect applicable laws, widely accepted international human rights frameworks and charters, and Ford's own internal policies and procedures. We require suppliers to follow all applicable Ford policies and comply with or exceed all applicable laws and regulations. Incorporated into our production [Global Terms and Conditions \(GT&Cs\)](#), the Supplier Code requires that suppliers must enforce a similar code of practice and require their subcontractors do the same. We are measuring compliance with the Supplier Code using the Sustainability Self-Assessment Questionnaire (SAQ) process outlined in the following section.

Ford's GT&Cs are further supplemented by our Social Responsibility and Anti-Corruption Supplier Guide. The Supplier Guide aligns with the Supplier Code and expands on our expectations and suppliers' obligations on specific topics, including the prohibition of child labor, forced labor (including human trafficking and physical disciplinary abuse), and any infraction of the law. The Supplier Guide also outlines Ford's requirements regarding ethical recruitment, including the prohibition of recruitment fees, misleading or fraudulent practices while offering



employment, and confiscating, destroying, concealing, and/or denying access to employee identity documents.

## Assessment of Risks, Due Diligence and Verification

**In 2022, we performed our third human rights saliency assessment to identify Ford Motor Company’s salient issues.** Conducted in line with the UN Guiding Principles Reporting Framework (UNGPRF), the saliency assessment identified and updated the human rights issues at risk of the most severe negative impacts through our activities and business relationships. In conducting the assessment, we consulted with global external subject matter experts in human rights, environment, and labor relations. The assessment identified 10 salient human rights issues, including child labor, forced labor and ethical recruitment, human trafficking, and equal and fair wages (see graphic). These apply throughout our business and extend to our partners and supply chain.

**Our Salient Human Rights Issues**



Issue	UN SDGs**
1 Access to water and sanitation	6 12
2 Air quality	3 11 12
3 Child labor	8
4 Climate change	6 7 9 12 13
5 Data protection, privacy and security	9
6 Forced labor and ethical recruitment	8
7 Harassment and discrimination	5 10
8 Health, safety and security	3 8
9 Human trafficking	5 8
10 Product safety and quality	3

† In alphabetical order.

†† Other SDGs might apply; for full detail on our contribution, see our [SDGs Index](#).

Ford’s cross-functional Human Rights Governance team manages and tracks 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 indicates opportunities to focus our efforts to address human rights issues, including those that affect how we source materials responsibly. We communicate our progress on our action plans to address our salient issues through our Integrated Sustainability and Financial Report and attached reports.

**We have conducted more than 100 human rights risk assessments in Ford’s global manufacturing facilities since 2004, evaluating how they align with our *We Are Committed to Protecting Human Rights and the Environment* policy.** In 2022, Ford continued using an established online third-party assessment tool from the [Responsible Business Alliance](#) (RBA) to assess human rights risks across our global manufacturing facilities in a consistent way. The RBA’s online assessment tool has been developed by human rights experts and provides a company the opportunity to identify areas within their facility that may be at more risk for human rights issues. Ford plans to continue utilization of RBA’s tool to best foster our processes to uphold human rights and to ensure all of Ford’s global facilities are regularly assessed for human rights risk. For more information, see our Integrated Sustainability and Financial Report and attached reports.

**We conduct Sustainability Self-Assessment Questionnaires (SAQs) with our global suppliers.** Managed through our membership with Drive Sustainability, the [SAQ](#) is based on the Automotive Industry [Guiding Principles](#) and [Practical Guidance](#) for sustainability which have been developed through a collaboration of global automotive original equipment manufacturers (OEMs). A growing element in our due diligence efforts, the SAQ allows us to assess supplier sustainability and alignment with our Supplier Code. It also supports our efforts to identify social and environmental risks and compliance actions throughout our supply base.



We continue to expand usage of the SAQ to all our tier 1 production suppliers, enabling us to assess policy alignment and ensure suppliers are compliant. In 2022, we incorporated SAQ results into our sourcing process (learn more about Sourcing for Sustainability below).

**We conduct an annual risk assessment of our Tier 1 supply base related to human trafficking and forced labor.** The assessment is based upon multiple factors, including geographic risk profile, commodity manufactured, supplier quality performance, SAQ results, and the nature of the business transaction. Ford performs this risk assessment with input from external resources and stakeholders, including IHS Markit and the US Department of State's "2022 Trafficking In Persons Report." We identified 22 countries in the Americas, Asia, Europe, Middle East, and Africa with high risk. Our 2022 supplier risk assessment included data from suppliers representing approximately 86% of our global production spend. The risk assessment supports our audit selection processes and provides key insights to improve our human rights program.

**We are maintaining a sharp focus on supply chain due diligence with respect to new and upcoming legislation.** We are aligning with suppliers and partners that share our commitment to international standards and best practices. In Europe we are implementing Germany's Supply Chain Due Diligence Act, which mandates that companies must ensure compliance with human rights among their entire supply chain, set up grievance mechanisms, and report on their activities and results. The Act also includes environmental protection in cases where environmental risks can lead to human rights violations. Legislation in the United States means we must conduct additional and/or specific due diligence into our supply chain and update our annual supply chain risk analysis and processes to align with legislation. As new issues arise, we will identify whether there are any gaps in our processes and, if so, work to close them immediately.

**We launched Sourcing for Sustainability in 2022.** The first metric to be launched, the Sustainability Self-Assessment Questionnaire (SAQ) Rating, ensures that suppliers (when requested) must complete the SAQ response and share it with Ford. In addition to the SAQ Rating, the following metrics will launch in 2023:

- Carbon Neutrality Target
- Acceptance of Supplier Code of Conduct
- Sustainability Score - based on supplier compliance with sustainability reporting requirements

If a supplier has an unacceptable sustainability metric, the decision to source must be reviewed at the Global Commodity Director level and a corrective action plan must be in place.

**We use standard costing in our cost estimation systems to support supplier sourcing decisions.** Based on our suppliers' pricing, if their quotation falls below our internal estimation of their costs, we may investigate to understand the cause and ensure the supplier pricing and cost structure, including labor, are sustainable. Historically, we have chosen not to source suppliers based on unrealistically low pricing/costing.

## Supplier Audits & Effectiveness

**We regularly conduct social responsibility audits of at-risk Tier 1 supplier factories.** These audits evaluate supplier compliance with both local law and Ford's human rights expectations as communicated in our Supplier Code. These audits are performed through the independent [RBA Validated Assessment Program](#) (VAP v7.0). As in previous years, 100% of Ford's 2022 audits were externally validated and certified by the RBA. Ford's auditee list includes suppliers representing a



broad range of commodity groupings from all regions of the world that were identified using our risk assessment process. Audits include worker interviews and can be either announced or unannounced.

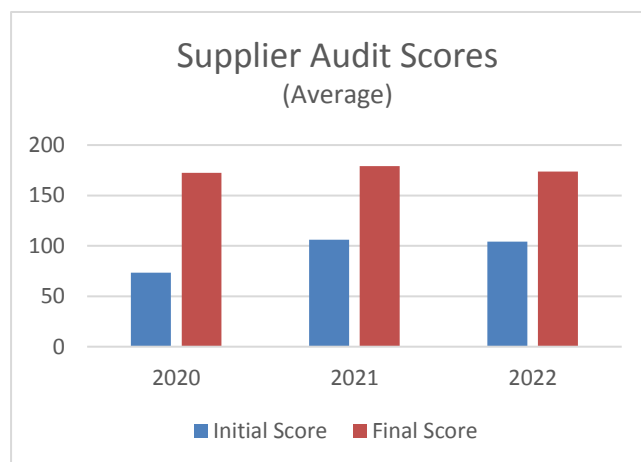
Per the RBA VAP, our audits of suppliers evaluate for 43 Conformance Requirements, including the following:

- All work must be voluntary
- Workers must not be under the age of 15, or under the supplier policy minimum age, or under the legal minimum age for employment, whichever of these is greatest
- Working hours do not exceed the maximum set by local law, and a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations
- Workers must be provided with understandable wage statements that include sufficient information to verify accurate compensation for work performed
- No harsh and inhumane treatment of workers
- No harassment of or discrimination against workers
- All workers have the right to form and join trade unions, to bargain collectively, and to engage in peaceful assembly
- All required permits, licenses and test reports for occupational safety are in place
- Potential for worker exposure to health and safety hazards is controlled
- Process to cascade VAP code conformance requirements to company's own suppliers and to monitor their compliance to the code

Audit results are used to identify and prioritize needed improvements at the facility level. Each supplier is expected to develop a Corrective Action Plan (CAP) detailing causes and provide planned remediation actions to address identified areas of concern and take measures to correct non-conformances. For more serious priority non-conformances, we review and monitor immediate containment plans and longer-term CAPs. Closure audits are scheduled to assess the results of CAPs, following a timeline based on the priority of non-conformances reported.

Ford publicly reports the findings of our supplier audits in aggregate, including the nature of non-conformances and remedial actions, in our Integrated Sustainability and Financial Report and attached reports. We analyze audit results to gain insight on areas where further supplier training is required. The goal of our audit and training program is for continued supplier capacity building at our highest risk suppliers.

In recent years, the average of scores for initial and final closure audits had been increasing, indicating the increase in supplier capacity and level of effort and progress achieved. However, scores plateaued in 2022. We are continuing to analyze these results and will integrate any pertinent findings into our 2023 risk assessment and training strategy.



**We participated in the development and launch of the new Responsible Supply Chain Initiative audit standard.** Ford is one of the 14 founding members of the Responsible Supply Chain Initiative (RSCI) launched by the German Automotive Industry Association VDA (Verband der



Automobilindustrie). The RSCI has developed a standardized assessment for evaluating the sustainability of companies in automotive supply chains, including social compliance of working conditions, occupational safety and environmental protection. In addition, it has developed an industry standard audit which is aligned with the German Supply Chain Due Diligence Act requirements as well as upcoming legislation such as the EU Directive on corporate sustainability due diligence.

In 2022, we piloted the new RSCI audit and will utilize the protocol to significantly increase the number and scope of supplier audits conducted in 2023.

**We continued Battery Supply Chain Mapping and Auditing.** Understanding the battery supply chain is critical to human rights. In 2021, we initiated supply chain mapping and auditing to understand the sources of the cobalt, nickel and lithium used in our EVs.

We continue to work with RCS Global Group to deliver a multi-commodity responsible sourcing audit program covering these key battery metals. This collaboration is strengthening our responsible sourcing capacity and driving continual improvements in transparency and responsibility in our raw material supply chains. In 2022, along with our suppliers, we underwent an audit of our nickel, lithium and cobalt due diligence management.

To date, we have conducted 30 supplier audits along five select battery supply chains at all tiers through to the mine site. These initial audits have led to the identification and mapping of 120 suppliers and identified mine sites in the Australia, Chile, Democratic Republic of Congo (DRC), Finland, Indonesia, Russia, and Turkey, advancing Responsible Mining Practices.

Ford is proud to become the first American automaker to join the [Initiative for Responsible Mining Assurance](#) (IRMA), expanding the company's commitment to safeguard human rights, communities where such work is done, and the broader environment. IRMA works to advance responsible mining practices at large-scale mining sites, providing third-party verification and certification against comprehensive environmental and social criteria for all mined materials. Ford's IRMA membership is another step towards the company's human rights aspiration to responsibly source all raw materials used within vehicles globally – a journey Ford has been taking steps toward for over 20 years.

## Transparency in Conflict Minerals

**We continue to engage our supply base globally to address the human rights issues associated with sourcing conflict minerals.** To comply with the U.S. Conflict Minerals Rule disclosure to the Securities and Exchange Commission (SEC), suppliers whose components contain 3TG (tin, tantalum, tungsten & gold) must conduct due diligence to understand the origins of these minerals, source them responsibly, and not knowingly provide minerals that may contribute to conflict. We require suppliers to use the Due Diligence Guidance and the associated framework compiled by the OECD to assess the chain of custody of these minerals. In alignment with the OECD framework, Ford conducts outreach directly to smelters and refiners to engage in an independent third-party responsible mineral sourcing validation program.

**Empowering Women In DRC's Cobalt and Copper Artisanal Mines.** Since 2021, Ford has been working with its international nonprofit and grant making partners to support and promote a program that will empower women working in the copper and cobalt supply chains in the Democratic Republic of Congo. The region has emerged as a key resource for critical metals that have become the



keystone of the energy transition as the automotive industry electrifies more vehicles. The Promoting the Empowerment of Women in Copper and Cobalt Mineral Supply Chains program aims to increase access to profitable, sustainable enterprises by training women on financial education, business management, mining innovation and leadership, and formalizing women's Artisanal and Small Mine cooperatives that allow equal access to market opportunities. The program addresses poverty, one of the root causes of child labor.

## Accountability & Grievance Channels

**We maintain internal/external accountability, holding all Ford employees and suppliers accountable to the standards on human trafficking set out in our *We Are Committed to Protecting Human Rights and the Environment* policy, Ford Code of Conduct, GT&Cs, Supplier Code of Conduct, and Supplier Guides.** Employees and suppliers have multiple avenues through which to report complaints or grievances, including those related to human rights and human trafficking. Some of these mechanisms allow for anonymous and confidential reporting, including telephone hotlines, a dedicated email inbox, and our SpeakUp website. External stakeholders may report by emailing [SpeakUp@ford.com](mailto:SpeakUp@ford.com). A cross-functional committee ensures that all reports are reviewed and addressed, and corrective or disciplinary action is taken where appropriate. Ford prohibits retaliation against anyone for making a good-faith complaint or for cooperating in a company investigation of such complaints.

In 2022, we launched the Responsible Business Alliance (RBA) [Worker Voice Platform](#), an external supplier grievance mechanism that features a worker survey tool, audit support, a mobile learning app, and a feedback and grievance reporting mechanism. The app is available in five different languages and enables employees a low-tech option to provide feedback and file grievances.

Ford also directs its suppliers and other external stakeholders to the Responsible Minerals Initiative (RMI) [Minerals Grievance Platform](#) (MGP) to submit grievances related to mineral supply chains. The MGP is a public platform that screens and addresses grievances linked to smelters and refiners of numerous minerals. The MGP allows Ford to assess very high-risk smelters and refiners that have pending allegations and understand if risks identified with third-party validated smelters and refiners are properly resolved.

## Global Internal / External Training

**We conduct human rights training to build capacity both within Ford and at our suppliers.** Within the company, Ford salaried full time, part-time, and agency workers received Ford Code of Conduct training which had an overview of our policies, including our *We Are Committed to Protecting Human Rights and the Environment* policy. We also regularly conduct internal training on our Supplier Code and Supply Chain Sustainability program with our global purchasing staff.

In 2022, over 800 global Purchasing staff received live online training on our Supply Chain Sustainability programs, including 215 employees from Ford's South Africa, India, Thailand, China, and Australia markets. We also developed and launched a new internal online training course, "Introduction to Supply Chain Sustainability," which was completed by 225 global employees in 2022. In December, we introduced two new mandatory trainings for purchasing employees: Supply Chain Sustainability for the Environment and Supply Chain Sustainability Legislation for Purchasing,





which were completed by more than 2,000 Purchasing employees by the end of the year.

Externally, we invite suppliers located in countries and regions where there may be elevated risk to attend training to increase awareness of Ford's requirements and legal obligations, including those related to forced labor and child labor. In 2022, although in-person training opportunities were limited due to the global COVID-19 pandemic, the RBA hosted a Responsible Recruitment Due Diligence training in Malaysia. We invited our suppliers in Malaysia to attend and sponsored their attendance.

**We continued our close collaboration with RBA and Drive Sustainability to update and deploy e-learning training modules for suppliers globally in 2022.** These modules covered general sustainability topics including high level information regarding forced labor and mineral due diligence. In collaboration with Drive Sustainability, live webinar sessions were offered to suppliers in Mexico, Germany, and the United States regarding country level topics. For greater detail on these industry trainings, please visit the Drive Sustainability [Capacity Building](#) and RBA [Training Resources](#) websites.

Ford trained over 130 suppliers via live webinars we developed for mineral due diligence on 3TG, cobalt and mica. Training was based on the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Area, including resources on how to improve suppliers due diligence process.

Individual supplier engagement sessions were also held between our Supply Chain Sustainability team and our top suppliers to exchange sustainability strategies and initiatives. These trainings and sessions are a key element of our due diligence process.

In addition to industry trainings, Ford's Supply Chain Sustainability team delivered presentations at the following events: RBA Responsible Business 2022, RMI Annual Conference 2022, Ford / Original Equipment Suppliers Association (OESA) Town Hall, and the Automotive Industry Action Group (AIAG) Virtual Corporate Responsibility Summit.

## Key Performance Indicator (KPI) Reporting

Select key performance indicators reported for 2022 include the following:

- Working conditions initial assessments (supplier audits completed to date)
- % of supply base total
- Follow-up assessments completed to date (third-party and/or internal)
- Supplier audit findings - prevalence of non-conformances in 2022 initial audits conducted (% of audits in which findings appeared)
- Supplier audit findings - initial and closure audit average scores (2020-2022)
- Supplier training (forced labor including general sustainability training)
- Internal training
- Supplier engagement

For additional information, see Ford's Integrated Sustainability and Financial Report and attached reports, including audit data and KPIs for 2022.



## COVID-19 Impacts & Response

**We understand that maintaining the stability of our supply base and the health and safety of all workers in our value chain during the global COVID-19 crisis is critical to preventing the pressurized and coercive conditions that can lead to forced labor, unsafe working conditions, and other labor and human rights violations in our supply base.** Ford remains dedicated to operating responsibly and safely by continuing to support our employees, our communities, and our suppliers as we learn to live and work with the realities of an ongoing COVID-19 presence.

Since early 2020, we have relied on our comprehensive COVID-19 playbooks for our [manufacturing](#) and [non-manufacturing](#) operations to guide our response to the ongoing pandemic, and the protocols we developed in 2020, which were also shared with our suppliers, continue to act as guiding principles. Our goal is to keep all our people safe and help limit the spread of the virus in the communities in which we live and work. We continue to closely monitor and follow health and wellness guidance from experts around the world.

We also strive to keep our employees educated about the virus, its symptoms, and preventative measures they can take. We diligently monitor our workplaces and when COVID infections in the workplace are reported, we act in accordance with local guidelines and regulations and work with our employee base to prioritize health and safety. We also continue to provide programs and services that help employees achieve good health and wellbeing and make informed choices. While the strict and necessary measures from early on in the pandemic have eased, we will continue to focus on the safety and wellness of our employee and supplier base and make future operational decisions based on guidance from health experts and government agencies.

## Partnerships with External Organizations

**We are a member of the Responsible Business Alliance (RBA), a non-profit coalition of more than 200 companies from the electronic, retail, automobile, and toy industries.** Ford was the first automotive company to join the RBA, expanding the scope of what was then the Electronics Industry Citizenship Coalition (EICC). The alliance's aim is to promote high standards in human rights, safety and security, environmental protection, and business ethics. We are active members on multiple workgroups through RBA and its Responsible Labor Initiative (RLI) and Responsible Minerals Initiative (RMI). Ford's workgroup participation supports discussions around cross-industry audit protocol advancement, living wage, artisanal and small-scale mining, and definitions of recruitment fees. We are also a member of the RBA Board of Directors.

**We are a member of the Automotive Industry Action Group (AIAG), a non-profit organization of over 3,000 global automotive OEMs and suppliers.** Ford is an active member of the Corporate Responsibility Steering Committee and the AIAG Board of Directors. We also co-chair the AIAG's Supply Chain Sustainability Committee, which works to increase supplier capacity for managing human rights and working conditions in the sector.

**We are a member of Drive Sustainability (The Automotive Partnership: Drive Sustainability).** This partnership of 10 automotive OEMs has a commitment to move to the next level of sustainability and supply chain management in the automotive industry. Launched in 2017 and facilitated by CSR Europe, Drive Sustainability builds on the work of the European Automotive Working Group, of which Ford was an active participant. We participate in the working groups



responsible for improving the SAQ program and for developing a globally aligned training program.

**We are a member of Initiative for Responsible Mining Assurance (IRMA), a non-profit organization of mining, purchasing, non-governmental organizations, labor, and community members.** IRMA has developed a comprehensive sustainability and human rights standard, offering third-party verification and certification for industrial-scale mines. In 2021, Ford was the first North American auto company to join IRMA. Ford participates in the IRMA Buyers group to help develop tools for purchasers interested in encouraging mining companies to engage in IRMA. Ford also continues to also communicate our commitment to source mined materials from IRMA certified mines to key commodity suppliers and encourage suppliers to source from IRMA certified mines.

**We are a partner of The Copper Mark, a non-profit industry-initiated organization to ensure responsible production of copper.** Ford joined The Copper Mark's multi-stakeholder Advisory Council in 2021. Ford conducted outreach to key suppliers to engage in The Copper Mark's mission to produce copper responsibly and be recognized by communities as making contributions to the UN's Sustainable Development Goals (SDGs).

For more information on external organizations in which we participate, see Appendix A.

**For further guidance on our programs, please review our Integrated Sustainability and Financial Report and attached reports which are published yearly and provide further details on actions taken by Ford Motor Company.**

This Global Modern Slavery and Human Trafficking Transparency statement has been reviewed and approved by the FCE Bank plc Board of Directors on March 15, 2023.

Signed:

*Carlos Treadway*

Chief Executive Officer  
FCE Bank plc

Date: \_\_\_\_\_



## Appendix A

Ford Partners and Memberships	What the Partner Does
<a href="#">Automotive Industry Action Group</a> (AIAG)	By being both proactive and collaborative, AIAG brings members together to develop innovative solutions to these and other common Corporate Responsibility challenges, both national and international. AIAG develops the active insights, trainings and tools members need to operate responsibly and profitably.
<a href="#">Drive Sustainability</a> (DS)	The Drive Sustainability partnership, facilitated by CSR Europe, shares the common goal of working together to improve the sustainability performance of automotive supply chains. Drive Sustainability considers that improvement and impact in the supply chain can be achieved by working with suppliers to build capacity and empowerment. Under this framework, the partnership organizes different activities like supplier training series, dialogue events or local networks.
<a href="#">Interfaith Center for Corporate Responsibility</a>	ICCR members represent faith-based organizations, socially responsible asset management companies, unions, foundations, and other responsible investors working alongside a global network of NGO and business partners. ICCR is committed to moving the current business focus away from achieving short-term returns and towards sustainable strategies that advance the common good.
<a href="#">Public-Private Alliance for Responsible Minerals Trade</a> (PPA)	The Public-Private Alliance for Responsible Minerals Trade (PPA) is a multi- sector initiative that supports projects in the Democratic Republic of the Congo (DRC) and the surrounding Great Lakes Region of Central Africa (GLR) to improve the due diligence and governance systems needed for ethical supply chains.
<a href="#">Responsible Business Alliance</a> (RBA)	A non-profit coalition of more than 200 companies from the electronic, retail, automobile, and toy industries. The alliance's aim is to promote high standards in human rights, safety and security, environmental protection, and business ethics.
<a href="#">Responsible Labor Initiative</a> (RLI)	Members, suppliers, recruitment partners and stakeholders use their collective influence and application of due diligence to drive the transformation of recruitment markets, reduce the risk of forced labor and provide remedy in global supply chains at all stages of recruitment and employment.
<a href="#">Responsible Mineral Initiative</a> (RMI)	RMI's flagship Responsible Minerals Assurance Process offers companies and their suppliers a third-party audit that determines which smelters and refiners have systems in place to source minerals responsibly in line with global standards. RMI also maintains the Conflict Minerals Reporting Template, a cross-industry tool for smelter disclosure. More than 380 organization from 10 industries participate in RMI today
<a href="#">UN Global Compact</a>	At the UN Global Compact, the UN aim to mobilize a global movement of sustainable companies and stakeholders to create the world we want. To make this happen, the UN Global Compact supports companies to: <ul style="list-style-type: none"> <li>• Do business responsibly by aligning their strategies and operations with Ten Principles on human rights, labor, environment and anti-corruption; and</li> <li>• Take strategic actions to advance broader societal goals, such as the UN Sustainable Development Goals, with an emphasis on collaboration and innovation.</li> </ul>
<a href="#">The Copper Mark</a>	The Copper Mark was created by the International Copper Associate (ICA) to ensure responsible production practices in the copper producing and mining supply chain. The Copper Mark uses RMI Risk Readiness Assessment to evaluate participants performance to The Joint Due Diligence Standard & The Copper Mark Criteria for Responsible Production using the Copper Mark Assurance Process allowing Ford, and other stakeholders to be informed about responsible copper production and strengthen the communities where the copper industry operates.
<a href="#">Initiative For Responsible Mining Assurance</a> (IRMA)	IRMA is a multi-stakeholder led organization, with a mission to protect people and the environment affected by mining. IRMA provides independent third-party verification and certification against a comprehensive standard for all large scale mined materials. Audit results are publicly available and provide transparency for purchasers interested in responsible sourcing of mined materials, and ensure a mine is implementing social and environment performance to reduce possible harm and is actively taking steps to improve ESG performance.



## Appendix B

### Index for Australia Modern Slavery Act

Criterion #	Requirement description	Location in Ford MSS
1	Identify Reporting entity	Page 1: 3rd paragraph
2	Structure, operations & Supply chain	Page 1: Overview section <b>Additional information:</b> Ford Motor Company of Australia Pty Ltd (ACN 004 116 223) is a proprietary company with its registered office at Level 1, 600 Victoria Street, Richmond, Victoria 3121, and is wholly owned by Ford Motor Company. Known as Ford Australia, it has carried on the business of design and supply of motor vehicles, together with their marketing, sale, and service by way of a system of independent authorised dealers, since 1925 (Ford Australia has no subsidiaries). Motor vehicles marketed and sold by Ford Australia are sourced from Ford facilities around the world, including Thailand, Spain, Romania, Germany and the USA, and its design, marketing and supply activities are supported by an in-country workforce of approximately 2500.
3	Risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Page 4: Saliency assessment
4	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Page 4: Assessment of Risks
5	Describe how the reporting entity assesses the effectiveness of such actions	Page 5: Supplier audits & effectiveness
6	Describe the process of consultation with entities that the reporting entity owns or controls	Page 1: 3rd paragraph
7	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Page 9-10: KPI Reporting, COVID 19 Response, Partnerships with External Organizations



## Appendix C

### Index for UK Modern Slavery Act

Requirement #	Requirement description	Location in Ford MSS
1	The organisation's structure, its business, and its supply chains	Page 1
2	Policies in relation to slavery and human trafficking	Page 3: Modern Slavery & Human Trafficking Policies
3	Due diligence processes in relation to slavery and human trafficking in its business and supply chains	Page 4: Assessment of Risks, Due Diligence and Verification
4	The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	Page 4: Assessment of Risks, Due Diligence and Verification
5	Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	Page 5-6: Supplier Effectiveness & Audits
6	The training and capacity building about slavery and human trafficking available to its staff	Page 8: Global Internal/External Training