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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX that enables Ford Otosan employees and stakeholders to report any activity considered or suspected to be illegal or a misconduct, which therefore constitutes a violation of the applicable legislation and/or Ford Otosan Code of Ethics, Code of Conduct & Ethical Rules and Compliance Policies.

Why do we need a system like EthicsPoint?

- Ford Otosan attributes great importance to honesty and accountability in all of its activities. It is our duty to maintain a culture of honesty and respect, and to oppose behaviors which might contradict the Ford Otosan's ethical standards.
- By creating open channels of communication, we also promote a positive work environment and maximize productivity.
- An effective reporting system augments our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

May I report using either the Internet or the telephone?

Yes. EthicsPoint enables you to file a confidential, anonymous report via either the telephone or the Internet.

What types of situations should I report?

The EthicsPoint allows you to notify Ford Otosan about the past, present or potentially future illegal or unethical behaviors or activities, which include but are not limited to the following types of issues:

- Criminal activities such as theft and fraud,
- All kinds of discrimination (race, religion, language, color, gender, age, etc.)
- Violation of ethical rules, laws, moral values and regulations,
- Threats against social security or health,
- Inappropriate use of company equipment
- Fraudulent activities in the accounting records,
- Giving or receiving bribes,
- Disclosing the Group's secrets,
- Money laundering,
- Environmental damage,
- Harassment,
- Mobbing.

If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you observe some behavior that you believe violates Ford Otosan Code of Ethics, Code of Conduct & Ethical Rules, and/or the legislation, we expect any of our employee or stakeholders to report it. If you are an employee, we recommend that you first bring any concerns forward to Ford Otosan Ethics Representatives. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that Ford Otosan partnered with NAVEX, an independent service provider. We would rather you report anonymously than keep the information to yourself.

Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the right people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. And, corporate misconduct can threaten the very existence livelihood of an entire company.

Does management really want me to report?

We certainly do. In fact, we need you to report. You know what is going on in the Ford Otosan and its subsidiaries - both good and bad. You may have initial knowledge of an activity that may cause for concern. Your reporting can minimize the potential negative impact on the related company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Who can I ask my question about the implementation of the compliance program and related policies?

You can find detailed information about the implementation of the compliance program and related policies [here](#).

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server. NAVEX makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation, location of the incident and considering the financial, reputational and regulatory impacts. Each of these report recipients has had training in keeping these reports in the utmost confidence. For details, please refer to Ford Otosan Ethics & Whistleblowing Policy.

Isn't this system just an example of someone watching over me?

No. The Ethics Hotline is a positive aspect of our overall philosophy that allows us to ensure a safe, secure and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with. Won't this log identify me as the report originator?

NAVEX does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café or at a friend's house) through the EthicsPoint secure website.

Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained.

I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system protects your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident.

Is the telephone toll-free hot line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

Do you keep voice records while reporting through the telephone?

No, telephone conversations are not recorded

Do you see my phone number if I call you? If so, will you report it?

We do not reveal the caller phone numbers. In the case you do not want to share your phone number, we will go by the alternative way we provided which you choose.

What if I want to be identified with my report?

There is a section in the report to identify yourself, if you wish.

Can you guarantee that I won't be get harmed because I file a report?

Ford Otosan protects the Whistleblowers, even if the accuracy of the incident could not be proved by an Investigation, so long as the notification is made in good faith, with reasonable grounds and without an intent to victimize or create disadvantages to others or gain a personal advantage. However, those who deliberately make false notifications may be subject to various Disciplinary Actions. Therefore, it is extremely important that the notifications are based on observations and can be proved, where possible.

Please refer to the Ethics & Whistleblowing Policy for details.

What happens after I file a report?

All notifications reported through the Ethics Hotline are first assessed by Ford Otosan's Ethics Assessment Board. The purpose of this preliminary assessment is to verify the notification's subject and determine whether the information provided is reliable. Depending on the results, either the relevant Ford Otosan company itself conducts the investigation in line with its internal procedures or the case is brought into attention of Ford Otomotiv Sanayi AS. If the case is submitted to Ford Otomotiv Sanayi AS, the Internal Audit Department or the Legal and Compliance Department perform the investigations, depending on their responsibility areas.

Please refer to the Ethics & Whistleblowing for details.

Who has access to the notifications?

To the extent permitted by law, details of a concern raised by a Whistleblower is only shared with those who has authority to (i) investigate; (ii) assess the matter and (iii) take action, on a need-to-know basis and whose names are not alleged in the related incident.

Ford Otomotiv Sanayi AS Internal Audit Department and the Legal and Compliance Department have unlimited access to all the notifications only if the notifications are not related to employees working in these departments, Internal audit functions and the officer or department in charge of compliance of the related Ford Otosan companies have limited access to the notifications only if the incident is linked to the related company, and the allegation is not related to the assigned users or the General Manager, Assistant General Managers or the Board of Directors of the relevant Ford Otosan Company.

Tips & Best Practices

I am aware of some individuals acting unethically, but it doesn't affect me. Why should I bother reporting it?

An unethical behaviour may threaten the general interests of individuals, our companies and the society, and that it leads to injustice. It may cause material and moral damage. Furthermore, if the relevant behavior is a violation of applicable laws, it is not only a moral duty but a legal obligation to notify the authorities. Therefore, if you know of any incidents of misconduct or ethical violations, please consider it your duty to yourself and your coworkers to report it.

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. NAVEX can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked.

What if my managers are involved in a violation? Won't they get the report and start a cover-up?

The EthicsPoint system and report distribution ensure that implicated parties are not notified or granted access to reports in which they have been named.

If the case that I would like to report is directly related to the General Manager, Assistant General Managers or the members of the Board of Directors of a Ford Otosan company, how do you keep me anonymous?

Regardless of the subject matter of your notification, if you want to remain anonymous, you can. You do not have to share your identity with NAVEX. Also, please note that if your notification is related to these people, the report is directly submitted to Ford Otomotiv Sanayi AS Internal Audit Department and the Legal and Compliance Department for further assessments. No employee of the relevant Ford Otosan company (other than Ford Otomotiv Sanayi AS) will have the right to reach out to your notification in this case. If your notification relates to a senior manager of Ford Otomotiv Sanayi AS, again, necessary measures will be taken to avoid conflicts of interest and to ensure that there will be a fair review.

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

What if I lose my Report Key or forget the Password I created?

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.

Can I recall a notification afterwards?

It is not possible to recall a notification after it is delivered to the authorized departments at Ford Otosan. However, you can share your recall request by creating a new report.

Can I still file a report if I don't have access to the Internet?

You can file an EthicsPoint report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.