



Due Diligence Report required by the Norway Transparency Act for the Year Ending on December 31, 2025

(à Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions; Enterprises shall carry out due diligence in accordance with the OECD Guidelines for Multinational Enterprises.)

1. INTRODUCTION

At Ford, our purpose has always been bigger than building vehicles. We are driven by a desire to build a world in which every person is free to move and pursue their dreams. To achieve our goals, we must build a strong, sustainable business that advances ground-breaking technology, supports people, our partners, and our customers. We published our first Corporate Citizenship report in 1999 and adopted our first Code of Human Rights and Basic Working Conditions for the company and our suppliers in 2003. To enforce our policy, we have conducted internal human rights assessments and social responsibility audits of our suppliers since 2003. We joined the United Nations (UN) Global Compact in 2007 and became a signatory to the UN Sustainable Development Goals in 2016, reporting our progress annually. In 2016, we were the first automotive company to join the Responsible Business Alliance (RBA).

In 2022 Ford issued the U.S. auto industry's first stand-alone global [Human Rights Report](#) to demonstrate our leadership in respecting human rights and our commitment to transparency and in 2023 we subsequently published our [Ford Human Rights Progress Report 2023](#), which presented key progress we made over that year to protect human rights within our business and manage the salient issues we have identified across our value chain.

This year marks our 27th annual sustainability report and sixth Integrated Sustainability and Financial Report, and we are committed to maintaining our leadership position in sustainability reporting. We have published a separate Sustainability Statement in accordance with the European Union Corporate Sustainability Reporting Directive (CSRD) (EU 2023/2772 of 31 July 2023). The CSRD requires disclosures against the European Sustainability Reporting Standards (ESRS) for topics deemed material in a Double Materiality Assessment (DMA); Ford has completed a DMA aligned with ESRS expectations and continues ESRS disclosures in the Sustainability Statement on a voluntary basis.

As part of this transition, we integrated our previously standalone Human Rights Report into these reports which have been prepared on a global basis for Ford Motor Company and its consolidated subsidiaries. The content of this Due Diligence report is based on Ford's Integrated Sustainability and Financial Report and related documents (see chapter 4).

FORD MOTOR NORGE AS

On May 29th 2024, Ford Motor Norge AS changed its ownership from Ford Motor Company A/S to Ford Netherland B.V who is now the company's immediate parent. The ultimate parent company and controlling party is Ford Motor Company, a company incorporated in the State of Delaware in the USA, which is the parent undertaking of the largest group to

consolidate these financial statements. Copy of the ultimate parent company's financial statements may be obtained from: Ford Motor Company, One American Road.

Ford Motor Norge AS is engaged in importing and distributing Ford Motor vehicles and ancillary products in Norway and does not sell cars directly to customers themselves or have its own unique supply base. In 2025 Ford became the 5th largest car brand in Norway with a total market share of 5.89 % with the company's total volume of 13.075 units. Ford achieved a passenger car market share of 3.95% and 16.2% for commercial vehicles. In 2025, total revenue was TNOK 5.408.487 and at year end Ford Motor Norge AS had 42 employees.

2. GUIDELINES AND PROCEDURES FOR HANDLING ACTUAL AND POTENTIAL ADVERSE IMPACTS ON FUNDAMENTAL HUMAN RIGHTS AND DECENT WORKING CONDITIONS

2.1 Guidelines & Procedures

We are committed to respecting human rights across our company, our supply chain, and the regions in which we operate. Ford's human rights strategy for our business, applicable to Ford and all its wholly owned subsidiaries including Ford Motor Norge AS, and suppliers is aligned with the United Nations (UN) Guiding Principles on Business and Human Rights and focuses on:

- Embedding human rights policies into the business;
- Implementing due diligence processes to identify, prevent, mitigate and account for human rights impacts in our business and our supply chain;
- Providing remedial actions when needed;
- Communicating transparently with our stakeholders about our processes and actions;
- Engaging constructively with suppliers, local communities, governments, non-governmental organizations, and other stakeholders, including indigenous people; and,
- Seeking third party assistance, as appropriate, to assess compliance with our policy.

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:

- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises Revision 2011
- International Bill of Human Rights (The United Nations Universal Declaration of Human Rights and its two Covenants) 1948
- The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work (2022)
- UN Women's Empowerment Principles
- United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)

Our goal is to ensure that everything we do – or that others do for us – meets or exceeds the minimum regulatory requirements and strives to create a positive impact on people and

the planet. Ford's [We Are Committed to Protecting Human Rights and the Environment](#) policy reinforces our commitment to human rights and the environment, and our [Supplier Code of Conduct](#) explicitly requires our suppliers to adopt and enforce similar policies and extend them to their own supply chain.

Our Vice President, Chief Sustainability, Environment and Safety Officer, called Chief Sustainability Officer (CSO), is responsible for interpreting and implementing this policy.

The Global Sustainability and Purchasing Supply Chain Sustainability teams are responsible for day-to-day operations of human rights and environment leadership, management and implementation.

Ford Due Diligence

Ford's due diligence processes are structured in line with the six steps described in the Norwegian Transparency Act guidance.

To support our due diligence activities, we conduct an annual risk assessment of our global operations using the Responsible Business Alliance (RBA) online Facility Risk Self-Assessment Questionnaire (SAQ). The RBA Facility Risk SAQs highlight areas of potential human rights and environmental risks, including child and forced labor, health and safety, and environment risks at the facility level by identifying gaps in systems, policies, and practices. They provide a consistent process to analyze risks globally and deploy appropriate preventative measures as required.

In 2025, we conducted 48 assessments covering 61 manufacturing facilities. Additionally, we expanded the SAQs to include Ford Customer Service Division parts and distribution centers. We also developed a more powerful risk analysis tool which is capable of processing more facilities in less time while improving accuracy of the results. Improved timing allows for more due diligence activities to take place.

Ford uses a saliency assessment to identify and prioritize the company's key risks associated with human rights, and areas where we can make an impact. The saliency assessment identifies potential high-risk human rights areas within our operations and along our value chain. We review and update the salient issues and key risks to the Company annually.

Supply Chain Due Diligence

Ford conducts Sustainability Self-Assessment Questionnaires with our global suppliers. Managed through our membership with Drive Sustainability, the [Self-Assessment Questionnaire](#) is based on the Automotive Sustainability [Guiding Principles](#) which have been developed through a collaboration of global automotive original equipment manufacturers. A key element in our due diligence efforts, the Self-Assessment Questionnaire allows us to assess supplier sustainability policy alignment for compliance and to support legal due diligence requirements. It also supports our efforts to identify social and environmental risks and drive compliance actions throughout our supply base.

We continue to expand coverage of the Self-Assessment Questionnaire for all our Tier 1 production suppliers. In 2025, we continued to include Self-Assessment Questionnaire results in our sourcing process and metrics.

Ford conducts an annual risk assessment of our Tier 1 suppliers to understand risks related to human trafficking, child labor, forced labor, and more based upon multiple factors, including geographic risk profile, commodity manufactured, supplier quality performance, Self-Assessment Questionnaire results, and the nature of the business transaction. Ford performs this risk assessment with input from external resources and stakeholders, including the Responsible Business Alliance. Our 2025 supplier risk assessment included a review of our large and complex Tier 1 production sites and a subset of our non-production suppliers. The risk assessment supports our audit selection processes and provides key insights to improve our human rights program.

We collaborated in the development of the Automotive Industry Action Group (AIAG) Forced Labor Due Diligence Program. In partnership with five other North American automakers, Ford worked throughout 2024 to develop an aligned industry approach for conducting and reporting forced labor due diligence activities. In 2025, we launched an initial pilot campaign with suppliers that supports our ability to expand our campaign in 2026. The AIAG Forced Labor Due Diligence Program includes negotiated pricing with world-class supply chain technology providers and an online marketplace with common reporting tools and resources. All participating OEMs are incorporating these elements into their own supplier due diligence practices. This approach facilitates standardized supplier reporting, a common reporting template, and innovative technology for the supply base at a reduced cost. The program also includes training to support suppliers in conducting their own forced labor due diligence.

Ford continues to enhance Sourcing for Sustainability. The first metric launched in 2022 was the Sustainability Self-Assessment Questionnaire Rating, which ensures that suppliers (when requested) complete the Self-Assessment Questionnaire and share it with Ford. In addition to the Self-Assessment Questionnaire rating, we also have a Carbon Neutrality target and an Overall sustainability score. In 2026, continue to evaluate key metrics to be included in the Supplier Score Card. We use this score card to determine suppliers' overall sustainability status. 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 prior to sourcing approval.

As part of the follow up on measures implemented to prevent and mitigate significant human rights risks, 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 Responsible Business Alliance [Validated Assessment Program \(VAP 8.0\)](#). In addition to RBA Audits, Ford continued use of the Responsible Supply Chain Initiative (RSCI) audit protocol in 2025 in conjunction with other OEM's and the RBA. As in previous years, 100% of Ford's 2025 audits were externally validated and certified by the RBA, including the RSCI Audits. Ford's auditee list includes suppliers representing a broad range of commodity groupings from all regions of the world that were prioritized using our risk assessment process. Audits include worker interviews, facility tours, and document reviews.

Audit results are used to identify and prioritize needed improvements at the facility level. Each supplier is expected to develop a Corrective Action Plan 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 Corrective Action Plans. Closure

audits are scheduled to assess the results of Corrective Action Plans, following a timeline based on the priority of non-conformances reported.

Summary of the results from the self-assessment questionnaire responses and audits are published in our [2026 Sustainability Statement](#).

2.2 Notification channels and grievance mechanism

When potential issues are identified by stakeholders, Non-Governmental Organizations (NGOs), media or supply chain partners, we take action to investigate the issue and understand our corporate and supplier involvement. We adapt our due diligence approach to each incident based on the type of inquiry. When a non-compliance occurs, we provide appropriate remedies and bring any violation to an end, including working with suppliers to implement corrective actions.

Grievance Mechanisms

Ford has established internal grievance channels as well as a dedicated external grievance channel specifically designed for other people affected by the activities of Ford and its suppliers for receiving complaints regarding human rights and environment-related issues.

Internal grievance channels:

Ford provides multiple ways for employees to report potential violations of law or policy, including human rights and environment-related concerns, including:

- The SpeakUp web reporting system (accessible through internal web reporting for individuals within Ford's domain);
- E-mail mailbox (speakup@ford.com);
- Internal global hotline (*1-800-847-7911); and,
- Designated individuals such as Regional and Local Investigations Coordinators, representatives from the Office of the General Council, Human Resources, and Security.

In addition, you can find more information on our internal grievance channels in our global Code of Conduct ([Speaking Up and Preventing Retaliation – Code of Conduct \(ford.com\)](#)) as well as on Ford's global website ([Governance and Policies \(ford.com\)](#)).

External grievance channels:

For human rights and environment-related complaints of other people affected by the business activities of Ford and its suppliers, Ford has established a dedicated separate channel using the Responsible Business Alliance Worker Voices Platform (accessible via a mobile application using a QR code, via the internet, by toll free phone and email, all of which are available on the Ford public webpage).

The public information is available on Ford's global website ([External Grievances \(ford.com\)](#)).

3. INFORMATION REGARDING ACTUAL ADVERSE IMPACTS AND SIGNIFICANT RISKS OF ADVERSE IMPACTS THAT THE ENTERPRISE HAS IDENTIFIED THROUGH ITS DUE DILIGENCE

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INFORMATION REGARDING MEASURES THE ENTERPRISE HAS IMPLEMENTED OR PLANS TO IMPLEMENT TO CEASE ACTUAL ADVERSE IMPACTS OR MITIGATE SIGNIFICANT RISKS OF ADVERSE IMPACTS, AND THE RESULTS OR EXPECTED RESULTS OF THESE MEASURES.

Ford utilizes a saliency assessment to determine and prioritize our most critical human rights risks, highlighting where we can drive meaningful change. This analysis targets potential high-risk human rights concerns across our internal operations as well as our global value chain. We actively review and update these issues on an annual basis.

We periodically review and update our assessments to ensure our most significant human rights topics remain valid based on recent trends and issues. Our 2025 saliency assessment re-validated our list of human rights and environment-related salient topics and identified the following most salient human rights issues for Ford including Ford Motor Norge AS due to its integration into Ford's global value chain (listed alphabetically):

- Climate Change and Environmental Health
- Data Privacy and the Use of AI
- Fair and Decent Work
- Forced Labor, Child Labor, and Human Trafficking
- Harassment and Discrimination
- Impacts of Electrified Product Transition
- Local Communities and Indigenous Peoples
- Occupational Health, Safety and Wellness
- Product Safety

Some examples which we would like to highlight within this context:

A. Child Labor

Ford prohibits the use of child labor in any form and requires our suppliers to enforce similar policies. Our Supplier Code of Conduct requires suppliers to:

- "Meet the minimum working age in any region where they operate while prohibiting employment of anyone below the age of 15, even if permitted under local law. Government-authorized job training or apprenticeship programs that clearly benefit the participants are the only exceptions to this requirement ó "Misleading or defrauding potential workers about the nature of the work
- Prohibit workers under the age of 18 from performing work that could jeopardize their health or safety, including night shifts, overtime, or hazardous work in compliance with ILO Worst Forms of Child Labour Convention (No. 182)
- Implement an appropriate mechanism to verify that the age of workers complies with the ILO Minimum Age Convention (No. 138), and provide substantiation of this verification mechanism upon request

- Cease employment of the child/children and take reasonable measures to enroll the child/children in a remediation/education program if child labor is discovered in its own facilities or in their supply chain”

In addition, to support our internal due diligence activities, we continue to rely on Self-Assessment Questionnaires (SAQs) from the Responsible Business Alliance to assess human rights risk in a quantitative process. Results of the SAQs conducted in 2025 did not identify any high-risk facilities, consistent with the previous year’s results.

We continue to update our annual supply chain risk assessment to identify risks, take appropriate measures to minimize them and continue alignment with legislative requirements. As we update our risk assessments for our supply chain, we also update the process for addressing and managing those risks. As new issues arise, we will identify whether there are any gaps in our processes and, if so, work to close them immediately. We continue to audit suppliers that have been assessed as having the highest risk of human rights violations. In 2025, we completed 23 Responsible Supply Chain Initiative audits and plan to continue utilizing the protocol in 2026. No instances of child labor or forced labor were identified during the audits. Consequently, no remediation measures were required, avoiding any potential loss of income for vulnerable families.

B. Occupational Health, Safety and Wellbeing

The health, safety and wellbeing of our people continues to be a top priority for Ford. Many of our internal standards go beyond applicable laws and regulations so that we can meet our commitment to protecting the safety of our workforce in all our locations.

Our Safety Operating System (SOS) ensures the work environment within our facilities is safe for our employees and meets or exceeds all regulatory and company requirements. An SOS dashboard allows us to quickly identify issues by location, region, or globally to ensure allocation of resources, providing us with deeper insight into our safety metrics.

The lagging indicator for safety performance is the Global Lost-Time Case Rate. In 2025, our Global Lost-Time Case Rate was 0.41 per 100 employees. These were cases with one or more days away from work per 200,000 hours.

4. LINKS TO USEFUL RESOURCES

- (a) [2026 Sustainability Statement](#)
- (a) [We Are Committed to Protecting Human Rights and the Environment](#)
- (b) [Corporate Code of Conduct](#)
- (c) [Ford Sustainability](#)
- (d) [Ford Supplier Code of Conduct](#)
- (e) [Conflict Materials Report](#)
- (f) [Responsible Materials Policy](#)