

**Ford Code of Human Rights, Basic Working Conditions and Corporate Responsibility**  
***Pre-Site Visit Facility Survey***

<b>Date</b>	February 16, 2018
<b>Location / Facility</b>	Dearborn Truck Plant
<b>Respondent</b>	
<b>Phone Number</b>	
<b>CDSID</b>	

**Perception and Understanding of Code**

1. In your opinion, what is the greatest value-add of conducting human rights assessments at Ford's owned and operated facilities?

Being included in this assessment serves to highlight the rights & protections that our employees here in the United States enjoy. The same rights and protections not always afforded to those in other countries. It also gives us an opportunity to review the safeguards and processes we have developed to monitor these rights to ensure they are working properly.

2. When you look at the code, and imagine using it to assess current practice at Ford facilities, what are the greatest areas of non-compliance that you might predict? How do you think management, workers and employee representatives at Ford facilities will view these assessments?

We don't foresee any areas of non-compliance at Dearborn Truck Plant. Because of the frequent attrition and periodic vacancies in salaried positions along with the periodic overtime requirements, the plant will continue to monitor salaried work hours to ensure ongoing compliance.

It is not anticipated that there will be any strong reaction either positive or negative to the assessments.

**Facility Conditions**

***Human Rights***

In order to gauge human rights risks, it is imperative that business enterprises identify and assess any actual or potential adverse human rights impacts with which they may be involved either through their own activities or as a result of their business relationships. Please answer the following questions to describe how your facility approaches assessment and management of human rights risks.

1. In your opinion, what does upholding human rights mean to your facility?

Upholding human rights at Dearborn Truck Plant means providing an environment in which employees can work safely, without the fear of harassment or discriminatory actions by treating everyone equally and with respect in accordance with the law and company policy.

2. How is the preservation of human rights monitored in your facility?

Dearborn Truck monitors the preservation of human rights by adhering to company policy and governmental laws. These rights are monitored through multiple annual audits, surveys and skip level meetings to solicit feedback. The plant also encourages the use of the various reporting mechanisms the company has made available to ensure any violations are investigated in a timely manner.

3. How is your facility working to reduce human rights risks? Please describe any particular processes or initiatives.

Employees are trained in different forums about corporate policies supporting human rights such as Diversity Training and Standards of Corporate Conduct Training. Corporate policies and government laws are also posted in conspicuous locations in the facility. There are ongoing communications to remind employees of the different policies and initiatives. Dearborn Truck Plant utilizes Safety Stand Downs, bulletins, newsletters, email and team meetings to cascade information. The plant also encourages and supports Pulse Surveys, Personnel Relations surveys and audits as well as Employee Engagement surveys.

4. How is your facility monitoring human rights risks?

Results of the surveys and skip levels referenced in previous responses are monitored and shared with Human Resources and Plant Leadership for action planning to address issues that get raised. Plant Leadership and UAW Representatives are in ongoing communication regarding issues as they arise and work collaboratively to resolve issues as quickly as possible.

5. How are you remediating any non-compliance to human rights policies or addressing identified human rights risks?

Once investigations are completed, if any individuals are identified as being in violation of corporate policy, the appropriate sanction is implemented as warranted. In all cases, the matter is addressed in accordance with Company policy. If any non-compliance is related to wage or benefit, the appropriate steps are taken to ensure employees are appropriately compensated.

6. Do you believe that you are making progress in minimizing human rights risks? What additional support do you believe is necessary in order to making continuous improvement towards upholding human rights?

We believe we provide an environment that respects human rights and have made strides to ensure we continue to protect those rights.

**Working Conditions**

1. Please describe how you meet each of the facets of “Basic Working Conditions” as outlined in the Code of Human Rights, Basic Working Conditions, and Corporate Responsibility. Use the following chart to outline: i) the policy / law(s) followed in order to meet these principles of “Basic Working Conditions” as outlined in Policy Letter 24, ii) the process your facility undertakes in order to implement such policy / law correctly, and, iii) where these documents are housed.

	<b>Policy(s) / Law(s) Followed</b>	<b>Process to Implement Policy Correctly</b>
<b>Child Labor</b>	<ul style="list-style-type: none"> <li>Fair Labor Standards Act</li> </ul>	<ul style="list-style-type: none"> <li>Plant does not employ candidates w/o either a High School diploma or at least reached the age of 18.</li> </ul>

	<b>Policy(s) / Law(s) Followed</b>	<b>Process to Implement Policy Correctly</b>
<b>Compensation</b>	<ul style="list-style-type: none"> <li>• Fair Labor Standards Act</li> <li>• UAW Collective Bargaining Agreement</li> <li>• Overtime Policy</li> <li>• At Will Employment</li> </ul>	<ul style="list-style-type: none"> <li>• Salaried employee compensation is developed by the Compensation Office in the HR Org using competitive analysis and a pay for performance philosophy for the annual compensation plan.</li> <li>• Hourly employee compensation is determined through the collective bargaining process and is audited by the Wage Administration Office of the Labor Affairs Department.</li> <li>• Exempt/Non Exempt status is determined by our HR Org and the office of the General Counsel.</li> <li>• Employees sign an At Will acknowledgement upon hire.</li> </ul>
<b>Forced Labor</b>	<ul style="list-style-type: none"> <li>• Fair Labor Standards Act</li> <li>• At Will Employment</li> </ul>	<ul style="list-style-type: none"> <li>• Forced labor is prohibited. All hours worked by hourly employees are captured in the TWOS system and posted for employee review for accuracy and salaried employees capture hours worked in Timekeeping.</li> <li>• Ford is an at will employer; employees can leave the company at any time for any reason.</li> </ul>
<b>Freedom of Association and Collective Bargaining</b>	<ul style="list-style-type: none"> <li>• National Labor Relations Act</li> <li>• UAW Collective Bargaining Agreement</li> </ul>	<ul style="list-style-type: none"> <li>• Employees have the right to participate in union member activities as provided by the National Labor Relations Act and governed by the National Labor Relations Board (NLRB). Complaints regarding company practices can be made directly to the NLRB for investigation, determination &amp; remedy.</li> </ul>
<b>Harassment and Discrimination</b>	<ul style="list-style-type: none"> <li>• Company Directive B-110: Anti-Harassment</li> <li>• Equal Employment Opportunity Act</li> </ul>	<ul style="list-style-type: none"> <li>• DTP has a Zero Tolerance Policy that is enforced. All complaints are investigated and employees are dispositioned appropriately.</li> <li>• All new employees are required to participate in Diversity Training and sign a copy of the company's Zero Tolerance Policy brochure.</li> <li>• Complaints can be directed to Labor Relations, the Personnel Relations Hotline for investigation or escalated to the Equal Employment Opportunity Commission (EEOC) for investigation</li> </ul>
<ul style="list-style-type: none"> <li>• Health and Safety</li> </ul>	<ul style="list-style-type: none"> <li>• Occupation Health and Safety Administration Guidelines</li> <li>• Safety Operating System (SOS)</li> <li>• UAW-Ford Health &amp; Safety Program</li> </ul>	<ul style="list-style-type: none"> <li>• OSHA Act activity monitors safety activities.</li> <li>• All Health and Safety processes are governed by the SOS process. Shop floor level, Plant and Executive reviews take place on a regular basis. SOS Self Assessments are conducted twice a year.</li> <li>• Safety Process Review Board joint forum held on monthly basis.</li> </ul>

	<b>Policy(s) / Law(s) Followed</b>	<b>Process to Implement Policy Correctly</b>
<b>Work Hours</b>	<ul style="list-style-type: none"> <li>• Fair Labor Standards Act</li> <li>• UAW Collective Bargaining Agreement</li> </ul>	<ul style="list-style-type: none"> <li>• Salary work hours and compensation are determined by the FLSA.</li> <li>• Hourly work hours are negotiated in the collective bargaining process. Violations of negotiated work hours are remedied through the grievance process.</li> </ul>
<b>Where are these documents housed?</b>		
<ul style="list-style-type: none"> <li>• Employee related details are maintained on personnel files for both salaried and hourly employees. In addition People Soft retains records of past and present salaried employees and TWOS retains records of past and present hourly employees.</li> <li>• Salaried salary ranges and wage structure is maintained by Compensation and Benefits within the Human Resources structure.</li> <li>• Collective bargaining documents and agreements are maintained by Labor Affairs within the Human Resources structure.</li> <li>• Hourly wage rates and structure are maintained in the collective bargaining agreements and with the Wage Administration Office of the Labor Affairs Department.</li> <li>• Grievance Procedure documents are kept on file with the local Labor Relations Offices.</li> <li>• Employee hotline records are maintained by the Personnel Relations.</li> <li>• Human Resources Policies and Procedures are documented and kept on the HR Online Site for salaried employees on the company intranet site.</li> <li>• Ford Corporate Directives and Policies are stored on the Ford Legal Access</li> <li>• OSHA records are maintained by DTP Medical and Safety Departments</li> </ul>		

2. In the code, it has been made explicit that Ford seeks to identify, report and address any suspicion of human trafficking in order to adhere to our commitment to ensuring Basic Working Conditions and Human Rights.
- a) Within your community, are you aware of or have noticed any human trafficking activity? If so, please describe.
    - We are not aware of any issue of human trafficking activity in this community. There have been no instances reported or observed.
  - b) Are you aware of any suppliers or businesses in which you interact that are suspected of or have been found to engage in activities of human trafficking, directly or indirectly?
    - We are not aware of any suppliers or businesses in which we interact that are suspected of or have been found to engage in activities of human trafficking, directly or indirectly.
  - c) Are you aware of the Company or any other entity supporting the Company in its recruiting efforts requiring fees or charging costs to job-seekers and workers related to recruitment for temporary or permanent job placement at the Company, including when the Company uses the services of Private Recruitment, Labor Broker or Employment Agent or performs recruitment activities directly?
 

We are not aware of the Company or any other entity supporting the Company in its recruiting efforts requiring fees or charging costs to job-seekers and workers related to recruitment for temporary or permanent job placement at the Company, including when the Company uses the services of Private Recruitment, Labor Broker or Employment Agent or performs recruitment activities directly.
  - d) Are you aware of the Company or any other entity supporting the Company in its recruiting efforts retaining or confiscating identity or other documents?
    - We are not aware of of the Company or any other entity supporting the Company in its recruiting efforts retaining or confiscating identity or other documents

**Corporate Responsibility**

1. Please describe how you meet each of the facets of “Corporate Responsibility” as outlined in the Code of Human Rights, Basic Working Conditions, and Corporate Responsibility. Use the following chart to outline: i) the policy / law(s) followed in order to meet these principles of “Corporate Responsibility” as outlined in Policy Letter 24, ii) the process your facility undertakes in order to implement such policy / law correctly, and, iii) where these documents are housed.

	<b>Policy(s) / Law(s) Followed</b>	<b>Process to Implement Policy Correctly</b>
<b>Community Engagement and Indigenous Populations</b>	<ul style="list-style-type: none"> <li>• Ford Corporate Responsibility Policy</li> <li>• Policy Letter 13:</li> <li>• Governmental Relationships and Civic Affairs</li> </ul>	<ul style="list-style-type: none"> <li>• Ford Global Week of Caring</li> <li>• Accelerated Action Days</li> <li>• 16 Hours Paid Community Service Annually</li> </ul>
<b>Bribery and Corruption</b>	<ul style="list-style-type: none"> <li>• Policy Letter 3: Standards of Corporate Conduct</li> </ul>	<ul style="list-style-type: none"> <li>• Annual financial disclosure declarations</li> <li>• Annual recertification of Standards of Corporate Conduct Training</li> </ul>
<b>Environment and Sustainability</b>	<ul style="list-style-type: none"> <li>• Policy Letter 17: Protecting Health and the Environment</li> </ul>	<ul style="list-style-type: none"> <li>• The Environmental Operating System has specific annual targets and measurables to ensure continuous improvement in environmental initiatives.</li> </ul>
<b>Where are these documents housed?</b>		
<ul style="list-style-type: none"> <li>• Employee related details are maintained on personnel files for both salaried and hourly employees. In addition People Soft retains records of past and present salaried employees and TWOS retains records of past and present hourly employees.</li> <li>• Salaried salary ranges and wage structure is maintained by Compensation and Benefits within the Human Resources structure.</li> <li>• Collective bargaining documents and agreements are maintained by Labor Affairs within the Human Resources structure.</li> <li>• Hourly wage rates and structure are maintained in the collective bargaining agreements and with the Wage Administration Office of the Labor Affairs Department.</li> <li>• Grievance Procedure documents are kept on file with the local Labor Relations Offices.</li> <li>• Employee hotline records are maintained by the Personnel Relations.</li> <li>• Human Resources Policies and Procedures are documented and kept on the HR Online Site for salaried employees on the company intranet site.</li> <li>• Ford Corporate Directives and Policies are stored on the Ford Legal Access SharePoint Site.</li> </ul>		

2. What local communities or populations do you regularly engage with? What issues are pertinent to them in relation to Ford’s projects and activities? What is your process to address issues pertinent to such local communities and populations?

Dearborn Truck Plant engages primarily with members of the Dearborn community. The community is economically diverse and considers Ford a valued employer. DTP actively participates in fundraising events for charities such as March of Dimes and Juvenile Diabetes Research Foundation. Salaried employees are encouraged to use their 16 hours of paid community service each year to benefit the members of the community.

3. How have you incorporated sustainable water strategies in to your facility’s operations? Can you point to any specific metrics / improvements that have been made and can be quantified? If so, please describe or provide

any relevant documentation that indicates progress. *Please contact the Manager, Social Sustainability, if unfamiliar with Ford's water strategy and related initiatives to receive additional information.*

Dearborn Truck Plant is always looking for ways to incorporate new sustainable water projects into our business. We have installed non-flushing urinals in the men's rooms to avoid constant flushing and water waste. Also, there are Maintenance PM's that review all process valves to ensure water leaks are discovered and repaired in a timely manner.

4. In your opinion, how do you believe sustainable water projects contribute to the health of staff, operations and the community?

By continuing to look for ways to implement water reduction projects or equipment, the plant is able to reduce our dependence on city water as this helps to reduce the overall cost to the facility and community.

5. What initiatives are being undertaken to reduce environmental / health impacts from operations? How is this contributing to your facility's ability to move towards being more environmentally sustainable in the long-term?

Each facility has plant specific targets in waste generation, water usage, oil reduction and energy consumption to support the global sustainability strategy. Working together with corporate and our suppliers, DTP is always looking for new technology or products that will reduce or eliminate energy usage, hazardous chemicals, water usage and air emissions.

#### **Responsibility for and Implementation of the Code**

1. How are you approaching continuous improvement in your facility's performance, practices and processes in place to comply with Policy Letter 24?

As part of the manufacturing organization, DTP is continuously involved in evaluating continuous improvement in many aspects of our operations, including human rights. DTP has several forums, including a joint Ford/UAW continuous improvement forum to discuss all issues of operations including human rights and safety. DTP will continue to participate in employee surveys, corporate audits, and mutual growth forums to identify areas for improvement and develop action plans to continue to improve all aspects of our operation, including human rights.

#### **Additional Information**

1. What would you suggest is most important for Social Sustainability to keep in mind in order to make this effort successful (both in terms of gathering information and creating a sense of partnership and shared purpose with the facilities)?

Using the various performance measures, perception surveys or questionnaire processes and formal Audits available to us in order to measure current state alignment and effectiveness would be quite an asset. We need to identify and work to the local priorities and fulfill the goal of an aligned and capable organization.

2. Any words of wisdom/advice?

As a global manufacturer, we need to communicate as well as effectively demonstrate the tenants of Policy Letter 24 in all of our facilities.