



**President and  
Chief Executive Officer**

March 29, 2012

## **Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility**

As more fully provided in Policy Letter No. 2: Relationships with Employees, the diverse group of men and women who work for Ford Motor Company (the "Company") are our most important resource. In recognition of their contributions, the Company has policies and programs designed to ensure that its employees enjoy the protection afforded by the principles articulated in this Policy. The Company also strives to be a good corporate citizen and works to implement policies and programs to benefit the communities where we operate. Although these principles are not new to the Company, they are vitally important to what we stand for as a company.

This Policy Letter sets forth the Company's guiding principles for human rights, labor, and environmental standards throughout its global operations. The principles are consistent with, and in many instances derived from, the human rights framework and charters listed below:

- International Bill of Human Rights (The United Nations Universal Declaration of Human Rights and its two Covenants) 1948
- The UN Human Rights Council Guiding Principles on Business and Human Rights (2011)
- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises Revision 2011
- The Global Sullivan Principles
- The ILO Declaration on Fundamental Principles and Rights at Work
- ILO Tripartite Declaration on Multinational Enterprises and Social Policy
- The UN Convention against Corruption (2005)

The diverse settings in which the Company operates require that a statement of our basic working conditions be general in nature. In certain situations, local legal requirements, labor agreements, and other contractual and noncontractual arrangements may modify portions of this Policy Letter. Nevertheless, the Company intends this to be an affirmation of basic guiding principles that should serve as the cornerstone of its relationship with our employees and other stakeholders in the countries where we operate.

### **Human Rights**

It is a goal of the Company to respect human rights in all of our activities. The Company will seek to neither cause nor contribute to adverse human rights impacts through our activities and will seek to timely address such impacts if and when they occur. Company personnel must follow the Company's corporate policies and comply with national laws and regulations related to human rights. Company personnel should also work to reduce the risk of potential human

rights violations by identifying risks, monitoring those risks, remediating any non-compliance, and reporting our progress publicly.

## **Working Conditions**

### Child Labor

The Company will not use child labor. In no event will the Company employ any person below the age of 15, unless this is pursuant to a government-authorized job training or apprenticeship program that would be clearly beneficial to the persons participating.

### Compensation

The Company will promote our employees' material well-being by providing compensation and benefits that are competitive and comply with applicable law.

### Forced Labor

The Company will not use forced labor in any form, and will not tolerate physically abusive disciplinary practices. The Company will not use or support human trafficking in its labor force.

### Freedom of Association and Collective Bargaining

The Company recognizes and respects its employees' right to associate freely and bargain collectively. The Company will work constructively with recognized employee representatives to promote the interests of its employees. In locations where employees are not represented by unions, the Company will provide opportunities for employee concerns to be heard.

### Harassment and Discrimination

As more fully provided in Policy Letter No. 6 - Equal Opportunity and Affirmative Action, and Directive B-110: Anti-Harassment – Zero Tolerance, the Company will not tolerate harassment or discrimination on the basis of gender, race, color, religion, age, national origin, sexual orientation, gender identity, disability, or veteran status.

### Health and Safety

As more fully provided in Policy Letter No. 17 - Protecting Health and the Environment and related directives, the Company will provide and maintain for all personnel a safe and healthy work environment that meets or exceeds applicable legal standards for occupational safety and health.

### Work Hours

The Company will comply with applicable laws regulating hours of work.

## **Community Engagement and Indigenous Populations**

The interests of indigenous people in the local communities where we operate are important considerations in the Company's projects and activities. The Company will work constructively with recognized representatives of these groups who have an interest in the Company's projects and activities, including implementation of sustainable water strategies.

## **Bribery and Corruption**

As more fully provided in Policy Letter No. 3 - Standards of Corporate Conduct, the Company will under no circumstances tolerate the giving or receiving of money, gifts, or favors to influence improperly the behavior of another individual, organization, government employee, politician, or

government body in furtherance of a commercial or personal advantage. Bribery is never permitted, even in countries or regions where it may appear to be tolerated or condoned.

### **Environment and Sustainability**

As more fully stated in Policy Letter No. 17 - Protecting Health and the Environment, the Company will conduct business in a manner that provides responsibly for the protection of health and the environment. The Company will as practicable continue to reduce and minimize the environmental impact of its operations in the short term, and work toward the implementation of environmentally-sustainable strategies in the long term.

### **Responsibility and Implementation**

The Company encourages businesses throughout our supply chain to adopt and enforce similar policies in their own operations that are similar to those articulated here. Further, the Company will seek to identify and do business with organizations that conduct their businesses to standards that are consistent with this Policy Letter including working to extend these principles within their own supply chain.

The Company will, as appropriate, seek the assistance of independent third parties to assess compliance with this Policy.

This Policy is not intended to benefit any third parties or to create or confer any third party rights.

All Company personnel must report known or suspected violations of this Policy through the established reporting channels. The Company prohibits retaliation against anyone who in good faith reports a violation.

The Vice President, Sustainability, Environment and Safety Engineering is responsible for interpreting this Policy with the concurrence, as appropriate, of the Executive Vice President, Global Manufacturing and Labor Affairs, the Group Vice President, Global Purchasing, and the Group Vice President and General Counsel.

All Ford Motor Company subsidiaries and affiliates should adopt a similar directive.

Alan Mulally

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This Policy Letter supersedes Policy Letter No. 24: Code of Basic Working Conditions and Corporate Responsibility, dated May 17, 2007.

**[See attached for additional information and resources on this topic.]**

## Policy Letter No. 24 REFERENCES AND CONTACTS (Updated October 2013)

Policy Letter No. 24: Code of Human Rights, Basic Working Conditions, and Corporate Responsibility

### **REFERENCES:**

[Policy Letter No. 2: Relationships with Employees](#)

[Policy Letter No. 3: Standards of Corporate Conduct](#)

[Policy Letter No. 6: Equal Opportunity and Affirmative Action](#)

[Policy Letter No. 17: Protecting Health and the Environment](#)

[Directive B-110: Anti-Harassment – Zero Tolerance](#)

[Corporate Sustainability Report](#)

[Sustainability & Corporate Citizenship](#)

[The Organization for Economic Co-operation and Development \(OECD\) Guidelines for Multinational Enterprises](#)

[The United Nations Global Compact](#)

[The United Nations Universal Declaration of Human Rights](#)

### **CONTACTS:**

- Manager, Social Sustainability:
  - Thomas Niemann (TNIEMANN) 20-62654
- Supply Chain Sustainability:
  - Mary Wroten (MWROTEN1) 24-87099

### **INTERPRETATION and OTHER AUTHORITIES:**

- Interpretation:
  - Vice President, Sustainability, Environment, and Safety Engineering
- With concurrence, as appropriate, by:
  - Group Vice President-Human Resources and Corporate Services
  - Group Vice President, Global Purchasing
  - Group Vice President and General Counsel