



Jim Wormington  
Senior Researcher, Africa Division  
Human Rights Watch (HRW)

Natalie Bugalski  
Legal and Policy Director  
Inclusive Development International (IDI)

May 28, 2021

Re: Ford Response to HRW and IDI Request for Comment on Human Rights in Aluminum Supply Chains

Dear Mr. Wormington and Ms. Bugalski:

Thank you for the opportunity to comment on the upcoming report on the human rights impacts of global bauxite mining and the automotive industry's efforts to source aluminum responsibly. Ford aspires to source only raw materials that are responsibly produced<sup>1</sup>. The automotive industry is considered a high consumer of aluminum for use primarily in chassis, engines, and printed circuit boards<sup>2</sup>. As a member of this industry, Ford acknowledges its role as an end user of aluminum within the bauxite/aluminum supply chain. Beyond the cited industry applications of aluminum, Ford also uses aluminum in the vehicle bodies of the F-150, F-250, F-350, Expedition, and Navigator. The Bronco has aluminum doors, swing gate, hood and fenders.<sup>1</sup>

While we cannot disclose supply chain links to the mine level due to confidentiality obligations with suppliers, below please find Ford's response to your letter dated May 13, 2021, on the subject of "Respecting Human Rights in Global Aluminum Supply Chains."

### **Due Diligence Policies for Aluminum Sourcing**

Ford is committed to respecting human rights which is embodied in our policy, [We are Committed to Protecting Human Rights and the Environment](#). The policy commits Ford to drive human progress by enhancing the health and well-being of the communities that surround us, respecting the rights of the people who live there, and protecting the environment. In addition, the policy expects our suppliers to adopt and enforce similar policies and extend them to their own supply chain.

Ford's [Supplier Code of Conduct](#) requires suppliers to conduct due diligence and increase transparency related to the source of requested raw materials used in Ford products and not knowingly provide products containing minerals that contribute to conflict.<sup>3</sup> We recognize that strict avoidance of a given mineral or mineral origin could have unintended consequences, including the loss of livelihood for a local population. Our goal is to improve the transparency of mineral sourcing within our supply chain to ensure we are sourcing responsibly. Ford requires suppliers to enforce a similar code of practice and that their subcontractors do the same.

Ford suppliers must also provide information upon request to verify the materials in the products supplied to Ford have been sourced responsibly in accordance with Ford's [Responsible Materials Sourcing Policy](#).

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<sup>1</sup> Ford [Integrated Sustainability and Financial Report 2021](#)

<sup>2</sup> Drive Sustainability, Responsible Minerals Initiative, and the Dragonfly Initiative [Material Change Report](#) (2018)

<sup>3</sup> Ford [Supplier Code of Conduct](#)

## Engagement with Third-party Certification Schemes to Promote Responsible Sourcing

Ford's Responsible Material Sourcing Policy states:

*Suppliers are required to use smelters and refiners that have been validated as conformant to a 3<sup>rd</sup> party responsible mineral sourcing validation program. Additionally, Ford encourages suppliers to extend responsible sourcing and due diligence to include CAHRAS.*<sup>4</sup>

Suppliers may be asked to verify that their materials were sourced responsibly. To help our suppliers source materials ethically and responsibly, we use enhanced requirements in contracts, reporting requests and transparent dialogue. We also participate in work groups and discussions to address ethical, environmental and labor issues, using tools to ensure the responsible sourcing of specific raw materials as early in the process as possible.

In order to fulfill Ford's aspiration to source only responsibly produced raw materials, we commit to work in cooperation with organizations like the Initiative for Responsible Mining Assurance (IRMA). Ford was the first American automaker to join IRMA in 2021.<sup>5</sup>

Ford's work with IRMA supports collaboration with cross-industry brands so that together we may communicate to mining companies consistent, clear, shared expectations for responsible practices. Ford will continue to conduct outreach to mining companies to engage with IRMA and undergo assurance.

In addition, Ford participates in several other multi-stakeholder initiatives to support responsible material sourcing across industries. Ford serves on the Responsible Business Alliance (RBA) Board for Directors and the Steering Committee for the Responsible Minerals Initiative (RMI). In addition, Ford chairs the Smelter Engagement Team in the Responsible Materials Work Group of the Automotive Industry Action Group (AIAG).

### Mineral Grievance Mechanisms

Ford directs its suppliers and other external stakeholders to the [Responsible Minerals Initiative \(RMI\) Mineral Grievance Platform \(MGP\)](#) to submit grievances related to mineral supply chains, including bauxite and aluminum. The RMI MGP is a public platform that screens and addresses grievances linked to mineral smelters' and refiners' supply chains. The MGP allows Ford to assess pending allegations and to understand if risks identified with third-party validated smelters and refiners are properly resolved.

Our corporate compliance program facilitates the confidential reporting of known or potential violations of the law or of our policies. External stakeholders may report by emailing [SpeakUp@ford.com](mailto:SpeakUp@ford.com). All reports are reviewed and addressed, and corrective or disciplinary action is taken where appropriate. A cross-functional committee oversees this process.

More information on how Ford responsibly sources minerals is available online on [Ford's Responsible Material Sourcing website](#).

We welcome the ability to review the report in advance of publication, including any references to Ford Motor Company, for awareness and input.

Sincerely,

Sue Slaughter  
Purchasing Director Global Material Cost, Supply Chain Sustainability  
Ford Motor Company

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<sup>4</sup> Ford [Responsible Material Sourcing Policy](#)

<sup>5</sup> Ford Media Center "[Ford Motor Company is First American Automaker to Join Initiative Promoting Responsible Mining](#)" (2021)