

# Lucid's Modern Slavery Statement for the Financial Year Ending on December 31, 2025

## 1. Overview

This statement is made pursuant to reporting requirements of applicable modern slavery, forced labor, child labor and transparency laws, which require qualifying businesses to provide disclosures related to steps being taken to prevent and reduce the risk that all forms of slavery, forced labor, child labor and/or human trafficking (which together we call "modern slavery") are not taking place in our supply chains or any other part of our business. In this pursuit, Lucid Group, Inc. supports transparency from businesses regarding efforts to deter modern slavery in our operations and supply chain.

This statement is prepared for the purposes of the UK Modern Slavery Act 2015 (the "UK MSA"), the California Transparency in Supply Chains Act (the "California SCA"), and the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Canada SCA") on behalf of Lucid Group, Inc. and its subsidiaries deemed to be reporting entities under each of the UK MSA, the California SCA, and the Canada SCA. For the purposes of the Canada SCA, this statement is a joint statement on behalf of Lucid Group, Inc., Atieva, Inc. and Lucid Motors Canada ULC. Unless otherwise specified, reference to "Lucid," "we", "us", "Company" or "our" refer to Lucid Group, Inc. and its subsidiaries.

## 2. Our Structure, Business and Supply Chain

Lucid is a technology company that is shaping the future of mobility through its innovations, advanced technology, and software-defined vehicle platforms. The company's award-winning Lucid Air and award-winning Lucid Gravity set new standards with their unmatched combination of performance, range, space, and efficiency. Additionally, through our collaboration with leading market and technology partners, Lucid is leveraging its advanced software and hardware architecture to power the next generation of advanced driver assistance system and true eyes-off, hands-off, and mind-off (Level 4) autonomous mobility systems for consumer and ride-hailing applications. Lucid designed, developed, manufactures and sells two groundbreaking EVs: The Lucid Air sedan, for which customer deliveries began in late 2021, and the Lucid Gravity SUV, which arrived on the road in late 2024. Each product has advanced the state-of-the-art with technical achievements, innovations, and superlatives in performance, energy efficiency, electrical architecture, software, design, and manufacturing.

The Lucid Air and the Lucid Gravity are assembled at our EV manufacturing facilities in Casa Grande, Arizona, named Advanced Manufacturing Plant-1 ("AMP-1") and in the Kingdom of Saudi Arabia ("AMP-2"). Our supply chain consists of both traditional automotive suppliers and high-tech industry suppliers for our vehicles as well as other suppliers providing goods and services to support our operations globally. Our global supply chain is primarily managed by our supply chain team at our Corporate Headquarters in Newark, California who purchase thousands of parts from hundreds of suppliers globally. Given the supply chain for our industry is complex, with many tiers between upstream raw material suppliers and our own manufacturing facilities, we are highly dependent on our suppliers to provide us with the information for their respective supply chains and recognize that they play a key role in helping Lucid to meet our commitments. We have begun to establish a program to foster collaboration and engagement with our suppliers and empower them to establish programs, policies and practices that mitigate the risks of modern slavery from occurring in their operations and supply chains.

## 3. Our Policies Addressing Prevention of Forced and Child Labor and Human Trafficking

We expect all our employees and everyone who works with us, including our suppliers and business partners, to conduct business ethically. In 2023, Lucid publicly communicated our commitment to uphold human rights by becoming a signatory to the United Nations Global Compact. We have embedded our commitment to address the risks of forced labor, child labor and human trafficking in multiple policies and procedures described below, which apply to all of Lucid's global operations.

- Our [Policy Against Forced and Child Labor](#) restricts the use of any form of modern slavery, including forced labor, child labor and human trafficking, in any parts of our operations and supply chain. The policy also encourages reporting of any suspected violations to our ethics hotline and prohibits retaliation for reporting.
- Our [Company Code of Business Conduct and Ethics](#) ("Company Code") outlines the company's standards that we expect all Lucid's directors, officers and employees to uphold. The Company Code prohibits discrimination, harassment and retaliation and upholds honest and ethical conduct.

- Our [Responsible Sourcing Policy](#) establishes our commitment to strive to source all raw materials responsibly and directs our suppliers to conduct due diligence on the source and chain of custody of raw materials used in any products provided to Lucid in alignment with the OECD's Due Diligence Guidance. We expect our suppliers to strive to source from smelters and refiners that have achieved conformance with a recognized audit protocol such as the Responsible Minerals Initiative's Responsible Minerals Assurance Program.
- Our [Supplier Code of Conduct](#) ("Supplier Code") restricts the use of any form of forced or child labor in our supply chain. This past year we also updated our Supplier Code to provide more guidelines to suppliers on restricted practices based on the eleven indicators of forced labor as defined by the International Labour Organization. The updated Supplier Code has been posted to our external website and is now available in five languages. Some of the requirements in our Supplier Code include:
  - Not to use, directly or indirectly, any form of forced labor, including indentured, bonded, slave, or other forms of involuntary labor or human trafficking or otherwise engage in labor practices that violate any applicable law of that jurisdiction.
  - To avoid the use of any child labor as defined in the International Labour Organization Minimum Age Convention and respect the rights and safety of young workers (those under 18).
  - To comply with all applicable laws and regulations regarding working hours, wages and benefits, rights of association, immigration status, withholding tax, and whistleblowing.
  - To restrict the charging of any recruitment fees to workers and require reimbursement if fees were found to be paid.
  - To enable workers to freely terminate their employment.
  - To safeguard the rights of employees to perform their roles without fear of prejudice, abuse, discrimination, and harassment of any kind.
- Our standard contract terms for all direct vehicle suppliers also include language prohibiting the use of any form of modern slavery, including a zero-tolerance approach to child labor.

We strive to hold our employees and suppliers to our standards. Any violation of our standards by an employee can result in disciplinary action, up to and including termination of employment. Suppliers are required to notify Lucid of any violations and work to remediate any identified issues immediately. Any violation by a supplier of our policies can result in termination of our business relationship with the supplier.

#### 4. Internal Accountability

Our Nominating and Corporate Governance Committee maintains oversight of our Environment, Social, and Governance ("ESG") programs and is responsible for reviewing the Company's policies and programs concerning environmental sustainability, corporate social responsibility, and governance, including human rights topics. Lucid also has a dedicated ESG Team who are responsible for managing our responsible sourcing program, including our efforts to minimize the risks of modern slavery in our operations and supply chain. In addition, Lucid's Human Rights Co-Sponsors, which consist of functional leads and representatives from Legal, External Affairs, Supply Chain and Human Resources, also provide ongoing oversight and guidance and help to address any challenges identified. The ESG Team provides updates to the Human Rights Co-Sponsors at least quarterly and to the Nominating and Corporate Governance Committee, as needed.

All Lucid employees are required to acknowledge Lucid's Code of Business Conduct and Ethics, which reflects the business practices and principles of behavior that support our commitment to maintaining the highest standards of business conduct and ethics. We expect every employee, independent contractor, officer and director of the Company to not only read and understand the business practices and principles described therein, but also to apply good judgment and the highest personal ethical standards in making business decisions. Any employee or contractor who violates the standards in Lucid's Code of Business Conduct and Ethics may be subject to disciplinary action that, depending on the nature of the violation and the employee's or contractor's history, may range from a warning or reprimand to termination of employment or contract and, in appropriate cases, civil legal action or referral for criminal prosecution.

Employees, suppliers and other third parties are able to report concerns, including those related to modern slavery, to our Speak Up! Integrity Helpline. This platform, which has also been added to our external website, allows internal or external parties to raise concerns through multiple avenues including online, via phone or text, or to any member of the Human Resources, Legal or ESG teams. These concerns may be raised anonymously.

## 5. Risk Assessment and Due Diligence

We recognize that certain factors in our operations and in the supply chains for any manufacturing industry, including those for electric vehicles, are at higher risk for modern slavery. These factors include, but are not limited to, operating in and working with suppliers in countries where modern slavery risks are prevalent and suppliers that subcontract work, hire foreign migrant workers, and are associated with raw material extraction, manufacturing and certain indirect services (e.g., construction). We recognize that addressing these risks is complex and challenging given the intricacy of our operations and supply chain, which spans multiple tiers and countries around the world. To support our policies, we are building our human rights program to manage the various risks associated with modern slavery in our supply chain and operations. Our progress to date includes the activities below.

- **Completed human rights saliency assessment:** To support the development of our human rights due diligence strategy, Lucid engaged LRQA to conduct a human rights saliency assessment to identify and prioritize the company's key risks associated with human rights in our operations and supply chain. The human rights saliency assessment was conducted in line with the United Nations Guiding Principles Reporting Framework and was performed through a combination of internal and external stakeholder interviews, desktop research and benchmarking.
- **Surveyed suppliers to gather supplier site data:** We recognize that one of the primary drivers of modern slavery risks is working with suppliers that operate in countries where modern slavery risks are more prevalent. To increase our understanding of our supplier location risks, we sent a survey to all direct, Tier 1 suppliers to gather information about the facility locations that are used to deliver goods and/or services to Lucid, including where those facilities are located and to identify which facilities, if any, had already completed a social compliance audit. We are in the process of gathering and evaluating this data to support our risk-based supplier engagement strategy.
- **Developed modern slavery due diligence framework:** We developed a modern slavery due diligence framework to establish a risk-based strategy for supplier engagement. The strategy establishes new training and verification (audits) expectations for suppliers to demonstrate conformance with Lucid's policies which began to be implemented in 2025.
- **Developed a supplier risk assessment model:** To support the deployment of our modern slavery due diligence framework, Lucid developed a risk assessment model to prioritize suppliers that may represent higher levels of risk (e.g., supplier location, commodity or service) and those where Lucid may have a higher ability to influence (e.g., spend).
- **Performed due diligence review of all new suppliers:** Lucid screens all new suppliers using third-party tools for potential human rights risks.
- **Implemented Elevated Supplier Risk process:** Lucid implemented a new review process for proposed suppliers with higher social and environmental risks to undergo final review and approval by the heads of Supply Chain and Compliance. Proposed suppliers are required to disclose additional detailed information regarding sourcing risks, traceability maturity, any social compliance audits completed, and status of their corrective actions. If the supplier is approved, the supplier is also required to commit to defined mitigation actions.
- **New supplier onboarding:** We request all new suppliers to acknowledge our Supplier Code of Conduct at onboarding. Our Supplier Code of Conduct contains anti-modern slavery provisions. Our contract template for direct, Tier 1 suppliers also includes restrictions against forced labor, including a zero-tolerance policy for child labor.
- **Monitor and maintain awareness:** We continue to maintain awareness of geographic risks, labor and sector trends and other risk factors through general media screening, our participation in working groups facilitated by the Responsible Business Alliance and Automotive Industry Action Group, and any reports directly sent to Lucid by NGOs or other parties. We also implemented a new internal escalation model to standardize how to address any issues raised about Lucid's supply chain.

## 6. Supplier Audits and Effectiveness

Lucid recognizes that audits are an important tool for monitoring our suppliers' adherence to our requirements. If Lucid has reason to believe a supplier may be engaged in any activity that would violate applicable laws against forced labor and human trafficking, Lucid would conduct additional investigations to ensure supplier compliance with these laws. Our contract language also requires our direct vehicle suppliers to implement any necessary corrective actions to remediate any issues identified.

We have begun requesting our highest risk suppliers to confirm if they have undergone a social compliance audit and if so, to disclose the report and status of corrective actions. We also have begun to manage corrective actions with these highest risk suppliers to confirm that select non-conformances identified in the audits have been sufficiently rectified.

7. Internal/External Training

Lucid implemented a new forced labor training which was rolled out to all employees in Supply Chain, Legal, External Affairs, and ESG, those in recruitment and all senior level employees. While the training is not mandatory, over 65% of employees have completed the training.

8. Remediation

To date, Lucid has not discovered any instances of modern slavery and, as such, has not had to take any measures to remediate forced labor, child labor, or any loss of income to the most vulnerable families that results from any such measures.

9. Effectiveness

Lucid recognizes the importance of reviewing and refining our processes in identifying and addressing risks of modern slavery in our business and supply chains. At this stage, our effectiveness measures are evolving and primarily focused on tracking relevant performance indicators related to our program design, supplier engagement, levels of employee awareness, and supplier audit completion. We will continue refining performance indicators as our due diligence program matures.

This Modern Slavery Transparency Statement has been reviewed and approved by the Board of Directors on May 25, 2026.

Signed:

Signed by:

*Marc Winterhoff*

Marc Winterhoff...

Interim CEO

Lucid Group, Inc.

May 27, 2026 | 2:18 PM PDT


Date

**Appendix A**

**Index for UK Modern Slavery Act**

Requirement #	Requirement Description	Where It's Covered in Lucid's Modern Slavery Statement
1	The organisation's structure, its business and its supply chain	Section 2. Our Structure, Business and Supply Chain Atieva, Inc. is a subsidiary of Lucid Group, Inc. Atieva, Inc. is a Delaware corporation that sells and ships electric vehicle parts and components to customers in the UK.
2	Policies in relation to slavery and human trafficking	Section 3. Our Policies Addressing Prevention of Forced and Child Labor and Human Trafficking
3	Due diligence processes in relation to slavery and human trafficking in its business and supply chains	Section 5. Risk Assessment and Due Diligence and Section 6. Supplier Audits and Effectiveness
4	The parts of its business and supply chain where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	Section 5. Risk Assessment and Due Diligence and Section 6. Supplier Audits and Effectiveness
5	Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	Section 6. Supplier Audits and Effectiveness
6	The training and capacity building about slavery and human trafficking available to its staff	Section 7. Internal/External Training

This Modern Slavery Statement has been reviewed and approved by the Atieva, Inc. Board of Directors on May 25, 2026.

Signed by:  
  
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 Marc Winterhoff  
 Interim CEO and Director  
 Atieva, Inc.

May 27, 2026 | 2:18 PM PDT  
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 Date

**Appendix B**

**Index for Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act**

<b>Requirement #</b>	<b>Requirement Description per Act Section 11</b>	<b>Location</b>
1	A description of the steps taken to prevent and reduce risks of forced labour and child labour, as per subsection 11(1)	Section 3. Our Policies Addressing Prevention of Forced and Child Labor and Human Trafficking, Section 5. Risk Assessment and Due Diligence, and Section 6. Supplier Audits and Effectiveness
	Supplementary information addressing each of the seven requirements in subsection 11(3):	
2	(a): The entity’s structure, activities and supply chains	Section 2. Our Structure, Business and Supply Chain  Atieva, Inc., a subsidiary of Lucid Group, Inc. and a Delaware corporation, sells electric vehicles to Lucid Motors Canada ULC, a subsidiary of Lucid Group, Inc. and an unlimited liability company under the British Columbia Business Corporations Act, registered at 1133 Melville St, Suite 2700, Vancouver, BC V6E 4E5. Lucid Motors Canada ULC has studios and service centers in Toronto, Vancouver, and Montreal and its business includes selling and servicing electric vehicles. These electric vehicles are imported into Canada from Lucid facilities in the US.
3	(b): Policies and due diligence processes in relation to forced labour and child labour	Section 3. Our Policies Addressing Prevention of Forced and Child Labor and Human Trafficking, Section 5. Risk Assessment and Due Diligence, and Section 6. Supplier Audits and Effectiveness
4	(c): The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk	Section 5. Risk Assessment and Due Diligence
5	(d): Any measures taken to remediate any forced labour or child labour	While we do require our suppliers to remediate any instances of modern slavery identified immediately, we have not identified any instances to date and have not had to take any measures to remediate.
6	(e): Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains	While we do require our suppliers to remediate any instances of modern slavery identified immediately, we have not identified any instances to date and have not had to take any measures to remediate.
7	(f): The training provided to employees on forced labour and child labour	Section 7. Internal/External Training
8	(g): How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains	Section 6. Supplier Audits and Effectiveness

This Modern Slavery Statement has been approved by the Board of Directors of Atieva, Inc. in accordance with subparagraph 11(4)(b)(ii) of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act on May 25, 2026.

Signed:

Signed by:

*Marc Winterhoff*

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Marc Winterhoff  
Interim CEO and Director  
Atieva, Inc.

May 27, 2026 | 2:18 PM PDT

Date