
Lucid Supplier Code of Conduct (“*Lucid Supplier Code*”)

At Lucid we live by the principles of hard work, exceptional performance, integrity, fairness, and respect for others and the environment; and our goal is to develop a stronger, ethical and sustainable supply base. The Lucid Supplier Code defines our principles and requirements for how our suppliers, vendors, staffing partners, contractors, subcontractors and sub-tier suppliers (“Suppliers”) should operate and applies to all Suppliers of goods and services to Lucid and any of its subsidiaries (“Lucid”).

The Lucid Supplier Code seeks to promote ethical business conduct, emphasize the importance of respecting human rights and minimize our environmental impacts. It is designed to align with international labor standards and internationally recognized due diligence frameworks, including:

- [The Organisation of Economic Cooperation & Development \(“OECD”\) Guidelines for Multinational Enterprises on Responsible Business Conduct](#) (“OECD MNE Guidelines”)
- [The OECD Due Diligence Guidance for Responsible Business Conduct](#) (“OECD RBC Guidance”)
- [The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#) (“OECD Minerals Guidance”)
- [The UN Guiding Principles on Business and Human Rights](#) (“UNGPs”)

Suppliers are expected to:

- Comply with local laws and regulations that impact the supplier’s business, including those relating to business ethics, human rights, health & safety and environmental issues.
- Implement and monitor programs designed to achieve conformance with the Lucid Supplier Code, even when the Code exceeds the requirement of local applicable law. In cases where national law and the Lucid Supplier Code are in conflict, Lucid respects national law while seeking to honor the higher standard.
- Implement due diligence programs and engage in continuous improvement to meet the expectations outlined in the OECD MNE Guidelines, OECD RBC Guidance, OECD Minerals Guidance, and UNGPs as applicable
- Promote and manage these expectations with their own workers (including both direct employees and contractors, suppliers, vendors and sub-contractors in their operations and across their supply chains, in order to foster responsible business conduct)
- Maintain documentation of their management system and provide Lucid with that documentation upon request.

Ethics

Lucid adheres to high standards of integrity and conducts its affairs in an honest and ethical manner and expects Suppliers to do the same. Suppliers must:

- Apply good judgment and the highest personal and professional ethical standards in making business decisions.
- Never acquire proprietary information from others through improper means, accept trade secret information that was improperly obtained, or induce improper disclosure of confidential information from employees or contractors of other companies.
- Deal fairly with their suppliers, employees, and anyone else with whom they have contact.

Reporting Mechanisms and Non-Retaliation

Suppliers will provide a clearly communicated mechanism, in local languages, for workers to report integrity concerns, human rights concerns, safety issues, and misconduct anonymously (unless prohibited by law). Suppliers should prohibit retaliation for reporting concerns or participating in an investigation and protect the confidentiality and anonymity of workers. Suppliers will monitor their reporting process, record issues raised, investigate as appropriate, and take appropriate action. If Suppliers receive reports of concerns that relate to Lucid, Lucid should be notified immediately.

Anti-corruption

Lucid does not tolerate corruption in any of its business dealings. Suppliers must:

- Not, directly or indirectly, offer, or accept bribes or kickbacks in any form.
- Comply with all applicable anti-corruption laws.
- Maintain accurate and complete books and records to monitor for and prevent corruption, self-dealing, embezzlement, fraud, money laundering, or other improper activities.

There are no exceptions to this policy, even if their competitors engage in improper behavior or corruption is an accepted practice in a country where they operate. Suppliers are required to adhere to both the spirit and the letter of this policy with respect to Lucid business anywhere in the world.

Trade Law Compliance and Ethical Operations

Lucid abides by trade compliance laws around the world and conducts its business with high ethical standards and integrity and expects its Suppliers to do the same.

Suppliers must operate honestly and ethically throughout the supply chain and in accordance with applicable trade compliance laws, including, without limitation, those laws pertaining to anti-competitive business practices, respect for and protection of intellectual property, company and personal data, export controls, and economic sanctions.

Conflicts of Interest

Lucid prohibits conflicts of interest in its business dealings. Suppliers must disclose potential or actual conflicts of interest in their dealings with Lucid, including any direct or indirect relationship between Lucid and their personnel that is likely to materially affect their bids or negotiations or to pertain to the performance of critical or high-cost work, including personal, business, volunteer, and economic relationships that may give rise to a conflict of interest, and financial interests of any kind.

Human Rights & Labor

Unless prohibited by local law or regulation, Lucid expects Suppliers to support equal employment opportunity and the upholding of human rights in the workplace. Suppliers must manage these expectations with their own workforce, including all temporary, migrant, student, contract, and direct employees.

Forced Labor, Human Trafficking and Slavery

Suppliers must not, directly or indirectly, utilize slave, bonded, indentured, prisoner or any other form of forced or involuntary labor, human trafficking or slavery as defined by the International Labour Organization. Suppliers must adhere to the following:

- All work, including overtime, must be voluntary. Workers should not be compelled to work through force, deception, intimidation or coercion.
- All workers must be free to terminate their employment at any time without financial reprisal or penalty.
- Workers should not pay any fees for recruitment or other fees¹ for employment, either to the Supplier directly or to any third-party entity which assists in recruiting or hiring workers. Suppliers are expected to repay any fees paid by the workers within one year and to maintain sufficient documentation showing repayment.
- If hiring foreign migrant workers who must migrate from their home country to another country for the specific purposes of employment, Suppliers will pay both the inbound and return transportation costs upon the end of their employment. Workers with permanent residency are excluded from this requirement.
- Workers should be free to move and free to leave when desired. Suppliers must not unreasonably restrict workers' movements within any Supplier-controlled facilities, including access to toilets, drinking water, dormitories or religious facilities.
- Suppliers must not confiscate or destroy any employee's personal documentation, including identification, passports and/or work permits. Documentation should not be withheld by Suppliers for any longer than necessary for administrative processing.
- Suppliers are expected to give all workers a written agreement describing the terms of employment, including the nature of the work, wages, and working hours. Suppliers should give these written agreements prior to the start of employment and in a language understood by the worker. Foreign migrant workers should receive their contract prior to leaving their country of origin. Suppliers should not make any substitution or change to the agreement after arrival in the receiving country of employment, unless these changes are to comply with local law and provide better or equal terms for the workers.

Child Labor and Young Workers

¹ To understand which fees are prohibited, Supplier should follow the Responsible Business Alliance's Definitions of Fees at <https://www.responsiblebusiness.org/media/docs/RBADefinitionofFeesJan2021.pdf>.

Suppliers will not use child labor in any form. Suppliers must observe the minimum employment age in their business activities and throughout their supply chain in accordance with the ILO Minimum Age Convention (No. 138). If child labor is identified in its own operations or supply chain, Suppliers are expected to immediately cease employment and take reasonable measures to enroll the child/children in a remediation or education program.

Suppliers should implement an age verification mechanism to verify the age of workers and provide verification for this mechanism upon request. Suppliers should ensure that all recruitment efforts for workers, including those of third-party contractors, include an age verification mechanism.

Workers under the age of 18 must be prohibited from performing work that could jeopardize their health or safety², including night shifts or overtime. Suppliers may use student workers provided they perform rigorous due diligence on educational partners, keep appropriate student work records and protect student workers' rights in accordance with applicable laws and regulations. If there are workers under the age of 18 identified performing hazardous work, Suppliers must identify other alternative, age-appropriate work.

Wages and Benefits

Suppliers will pay wages and benefits in compliance with local laws and in a timely manner. Suppliers must provide workers with a detailed wage statement that includes sufficient information to verify accurate compensation for work performed. Deductions from wages as a disciplinary measure are prohibited.

Working Hours and Rest Days

Suppliers will comply with all applicable laws regarding hours of work, including overtime, maximum hours, rest periods and religious holidays. Workers should be provided with at least one day off every seven days.

Discrimination & Harassment

Suppliers will provide equal employment opportunity, regardless of any characteristic protected under applicable state or federal laws and regulations. Suppliers will not require workers or potential workers to undergo unlawful medical tests, including pregnancy tests or physical exams, that could be used in a discriminatory manner.

Suppliers should promote a respectful environment and must safeguard the rights of employees to perform their roles without fear of prejudice, discrimination, harassment, or any harsh or inhumane treatment, including violence, physical coercion, or verbal or psychological abuse.

Freedom of Association

Suppliers must recognize and respect the right of employees to freedom of association and collective bargaining in accordance with local law. This includes the right to form and join trade unions of the workers' own choosing, to bargain collectively, and to engage in peaceful assembly, as well as the right to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

Sustainable and Equitable Practices

We believe that a variety of perspectives fuels innovation and drives our success. We are committed to creating an environment where everyone is valued and respected. We expect Suppliers to comply with the principles set out in the Lucid Supplier Code, which includes promoting a workplace where everyone feels safe, respected, and valued. By embracing these principles, Suppliers can help us build a supply chain that reflects our commitment to sustainable and equitable practices, ultimately driving innovation and success for all.

Health and Safety

Suppliers should provide healthy and safe conditions for their workers and any visitors to their workplace. Suppliers should strive to protect their workers and integrate health and safety practices throughout their operations. Suppliers will integrate the following:

- Compliance with all occupational health and safety laws and regulations
- Identify, evaluate and mitigate worker exposure to health and safety hazards, including mechanical, chemical, biological, physical and ergonomic stressors, electrical and energy sources, fire, vehicles, fall hazards, and other physically-demanding work
- Provide appropriate personal protective equipment free of charge, train on when and how to use the PPE correctly, and provide information on any potential risks to them as a result of the hazards
- Provide regular health and safety training to workers
- Implement an effective fire safety management system and emergency plan at every supplier worksite that safeguards employees and others by providing an appropriate number of clearly marked and unobstructed

² Suppliers should follow the ILO Worst Forms of Child Labour Convention (No. 182) for other hazardous work.

emergency exits and evacuation routes and providing first aid material and medical assistance/procedures to workers

- Identify and take reasonable steps to address working conditions that pose a risk to pregnant or nursing women, inform them of any potential hazards in advance, and provide reasonable accommodations,
- Implement procedures to prevent, manage, track, and report occupational injury and illnesses
- Regularly assess machinery safety risk to workers and establish controls where appropriate
- Provide workers with ready access to clean toilets, potable water, sanitary eating and storage facilities. If workers are provided with dormitories or housing, Suppliers should provide facilities that are clean and safe with adequate personal space, reasonable entry and exit access, emergency egresses, heat and ventilation, adequate lighting and hot water for bathing
- Maintain adequate records of required trainings, risk assessments, hazard analyses, safety data sheets, work-related incidents and injuries, and notifications or violations of applicable health and safety regulations

Environmental Stewardship

Lucid is committed to accelerating the world's transition to sustainable energy and protecting the environment. Suppliers should develop, implement, and support a proactive approach to environmental responsibility through environmental protection practices, conserving natural resources and reducing overall environmental footprint of production, goods and services throughout their life cycle.

Protecting the Environment

We expect Suppliers to take appropriate measures to address the following areas:

- Environmental Regulatory Compliance: Ensure compliance with all applicable environmental laws and regulations
- GHG Emissions: Have systems in place or actively work to develop systems to measure facilities' carbon footprints by tracking Scope 1, 2, and 3 greenhouse gas ("GHG") emissions and provide this information to Lucid upon request
- GHG Emissions Reduction: Implement programs to reduce greenhouse gas emissions through efforts like increased efficiency, lower energy consumption, more carbon free energy etc., and provide updates on progress to Lucid as requested
- Product Carbon Footprint: Assess or actively work towards assessing the carbon footprint of products supplied to Lucid using recognized methodologies such as Life Cycle Assessments or Environmental Product Declarations (EPD) and provide the results upon request
- Water Quality, Consumption & Management: Minimize water consumption, effectively reuse and recycle water with responsible treatment of wastewater discharges and prevent potential impacts from flooding as a consequence of rainwater run-off.
- Air Quality: Routinely monitor and disclose, appropriately control, minimize, and to the extent possible, eliminate emissions contributing to air pollution in accordance with applicable law. Suppliers should assess cumulative impacts of pollution sources at facilities and mitigate pollution levels accordingly.
- Circularity: Promote closed loop systems with sustainable, renewable natural resources while reducing waste and increasing reuse and recycling where possible.
- Biodiversity, Land Use and Deforestation: Protect ecosystems, especially key biodiversity areas, impacted by operations, and avoid illegal deforestation in accordance with international biodiversity regulations, including the International Union for the Conservation of Nature (IUCN) Resolutions and Recommendations on Biodiversity.
- Responsible Chemical Management: Identify, minimize or eliminate the use of restricted substances in manufacturing processes and finished products to ensure regulatory compliance. Suppliers should also be aware of any use of banned or restricted substances in processes and finished products and actively investigate suitable substitutes to maintain product and environmental stewardship.
- Pollution Prevention and Resource Conservation: Emissions and discharges of pollutants, harmful soil change, and generation of waste and noise pollution should be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, should be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.
- Animal Welfare: Respect the five animal freedoms formalized by the World Organization for Animal Health (OIE) concerning animal welfare. No animal should be raised and killed for the single purpose of being used in an automotive product.
- Materials restrictions: Adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products, packaging, and manufacturing, including labeling for recycling and disposal.

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- **Environmental Targets:** Strive to set environmental targets, including science-based and time-bound emission reduction goals and renewable energy objectives that are aligned to limit the global temperature rise to 1.5 degrees Celsius, and share data and progress when requested.

Responsible Sourcing of Raw Materials

Lucid strives to minimize the human rights and environmental issues inherent in the sourcing, processing and trading of primary and secondary raw materials. Suppliers are expected to take appropriate measures to minimize risks, including:

- Implement due diligence in alignment with the OECD Minerals Guidance and OECD RBC Guidance to assess, identify and mitigate human rights and environmental risks in the supply chain.
- Strive to source only from processors, mines, farms, etc. that are in compliance with local laws and regulations and have been audited to a responsible sourcing, independent, third-party auditing standard, such as the Responsible Minerals Initiative's (RMI) Responsible Minerals Assurance Process (RMAP) and Initiative for Responsible Mining Assurance standard (IRMA).
- Respect the land rights of Indigenous Peoples in accordance with local laws and regulations, the ILO Indigenous and Tribal People's Convention (No. 169), and the United Nations Declaration on the Rights of Indigenous Peoples.
 - Do not engage in any acts constituting or aiding unlawful eviction or unlawful taking of land, forests, or waters securing the livelihood of human beings and will strive to ensure Free, Prior, and Informed Consent of communities is pursued and obtained prior to activities that may affect them and the lands on which they inhabit, with particular consideration to vulnerable groups.
- Upon request, support traceability efforts to demonstrate the origin and control of each raw material for Lucid to meet regulatory requirements, including providing supply chain mapping data (identification of sub-tier suppliers, supplier locations, geolocations of farms, etc., as requested) and establishing chain of custody (e.g., bills of lading, purchase orders, payments).
- Promptly correct any failures to comply with applicable local law and Lucid's Supplier Code and provide evidence to Lucid that the issue has been corrected.
- Remove any non-compliant materials from their supply chain and replace them with materials that comply with applicable local law.

Raw material suppliers should seek to obtain third party assurance of their responsible sourcing that covers human rights and environmental risks.

- Mineral processors are expected to seek RMI's RMAP certification, use best efforts to implement RMI's ESG standard or an agreed upon third party certified equivalent, and request upstream material suppliers to undergo similar applicable responsible sourcing standards.
- Mining suppliers are expected to seek certification by an independent third-party responsible mining assurance standard, such as the Standard for Responsible Mining from the Initiative for Responsible Mining Assurance (IRMA) or an agreed upon third-party certified equivalent.

Management System

Suppliers will establish a management system that is designed to ensure their operations comply with Lucid's requirements and applicable laws and regulations, conform to the requirements in this Lucid Supplier Code, identify and mitigate operational risks to the Lucid Supplier Code, and facilitate continual improvement. The management system should address the following:

- Clearly identify management representatives responsible for ensuring implementation of the management system and associated programs;
- Establish processes to identify, monitor and comply with all applicable laws, regulations, standards and requirements;
- Conduct ongoing self-assessments, monitoring and written improvement for its management system;
- Provide training for new and ongoing workers and the Supplier's own suppliers, as determined by the Supplier, to support implementation of the Supplier's policies and conformance with this Lucid Supplier Code and all applicable legal requirements;
- Process for communicating clear and accurate information about their policies, practices, expectations, and performance to workers, suppliers, and customers; and
- Create and maintain documents and records to meet regulatory requirements and Lucid's Supplier Code along with appropriate confidentiality.

Ongoing Oversight

Suppliers must maintain accurate and up-to-date recordkeeping indicating their compliance with the Lucid Supplier Code and all applicable laws and regulations. Lucid, along with its partners and independent third parties, may conduct

audits to observe the principles and requirements of the Lucid Supplier Code in action. Suppliers must comply with such audits and respond to requests for information promptly and with transparency. This includes providing access to site operations, documents, records, and employees, including permanent, temporary, and agency workers. Lucid expects Suppliers to make improvements in reasonable and defined timeframes when any Lucid Supplier Code standards are not met.