



Code of Business  
Conduct and Ethics



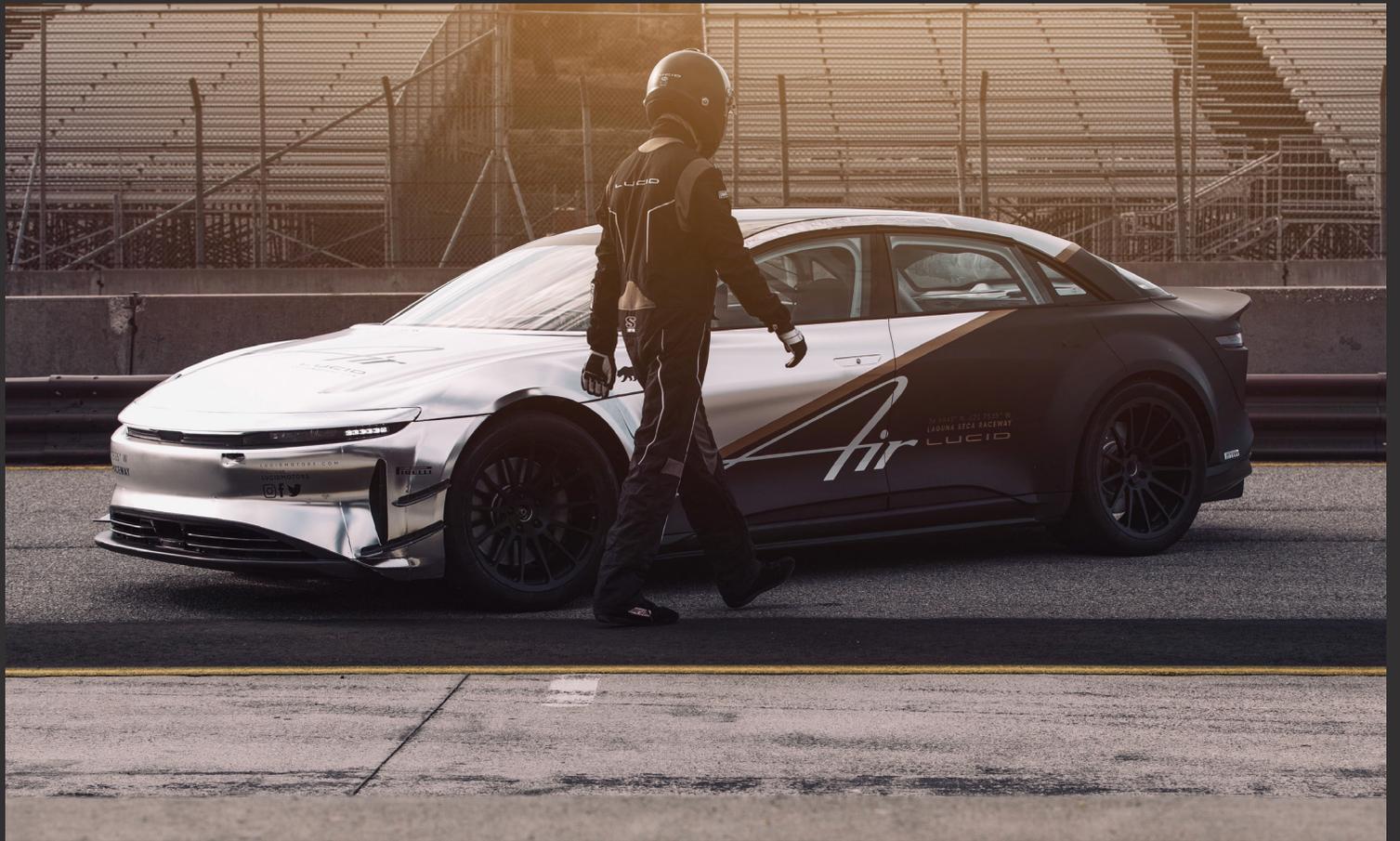
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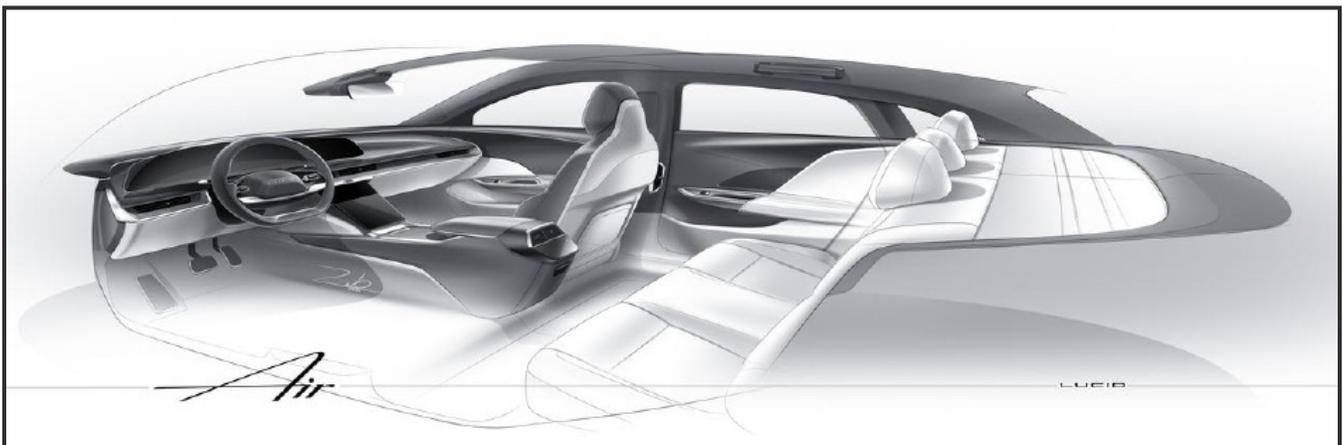
# A Message from Leadership

Being a member of the Lucid team means you are central to driving our mission to inspire the adoption of sustainable energy by creating advanced technologies and the most captivating luxury electric vehicles, centered around the human experience. In pursuing this mission, Lucid's Code of Business Conduct & Ethics (our "Code") sets forth our commitment to doing business honestly and with integrity.

Our Values reflect this commitment, particularly in our Ownership Mindset as we take accountability for our actions and work together as One Team demonstrating Integrity in Action. This Code sets guiding principles and expectations to help you make the right decisions and take the right actions in all that you do. It is important that you take the time to understand the Code and your responsibilities as you act on behalf of Lucid, our partners, and our customers.

Each of us plays an important role in Lucid's ethical practices, and if you have any concerns about unlawful, unethical or dishonest behavior in any form, or are unsure about what to do, please speak up. We offer various channels to let your voice be heard including the [Integrity Helpline](#). Any employee who makes a report will be treated respectfully and fairly and Lucid has a non-retaliation policy that means you do not have to be afraid of asking questions or voicing concerns regarding potential issues.

We expect everyone at Lucid to know and follow the Code and ask each of you to continue to embrace our high standards in upholding the Code. Thank you for your commitment to the company, our culture, and our customers.



# Preamble



**This Code sets forth the business conduct and ethics expectations of Lucid’s Board of Directors and its Executive Leadership. It applies to all Lucid directors, officers, and employees. Any waiver of the provisions in this Code for executive officers or directors may only be granted by the Board and may require disclosure to the Company’s stockholders. Any waiver of this Code for other employees may only be granted by Lucid’s Compliance Officer.**

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**Violations of this Code may result in disciplinary action, up to and including termination. Material amendments to this Code must be approved by the Board.**

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# Honest and Ethical Conduct



At Lucid, we must always operate with the highest standards of business conduct. This means operating honestly, ethically, and with integrity. Failure to do so imperils our brand, our reputation and puts the company at risk. As a Lucid employee, officer, director, or independent contractor, it is your duty to always act in an honest and ethical manner and to responsibly navigate the moral, legal and regulatory challenges that Lucid faces.

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What does it mean to be honest and ethical?

It means

- Being truthful and direct in all professional dealings
  - Displaying principled behavior and good judgment
  - Honoring the commitments you have made, including your commitment to follow this Code.
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# Responsibility of Management

All managers at Lucid have heightened responsibilities under this Code. It's not enough for you to act honestly, ethically, and with integrity—as a manager your role is also to ensure others do the same. As a manager you are:

- Responsible for employment decisions
- Responsible for empowering your team
- Accountable for all decisions you and your team make

## **At Lucid, we expect you to do this by:**

Supporting those that speak up:

- Have an open-door policy for your team and discuss all their concerns and questions
- Take any complaints and reports from your team seriously
- Connect them with Ethics & Compliance or Human Resources if they need further guidance

Remaining vigilant about ethics and compliance:

- Make sure you and your team fully understand and abide by this Code, Lucid policies, and Lucid's legal obligations
- Monitor and hold your team or any third parties accountable for any non-compliance, and implement any training requirements
- Ensure issues you are aware of are being appropriately addressed

Recognizing that as a manager, you speak on behalf of the company:

- Demonstrate good judgment
- Remember to always act with integrity

If you see something, do something:

- Lead by example and if you suspect or see something suspicious, respond immediately—and encourage your team to do the same

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# Product Safety



We take safety and security of our customers seriously and expect you to do the same. In the United States, over 40,000 deaths per year occur on our nation's roads. We want to do our best to reduce that number by ensuring our customers are driving safe, quality electric vehicles.

As a member of the Lucid community, it is your responsibility to raise all product safety concerns – no matter how minor – to the attention of your manager, the Product Safety Working Group, our Product Safety Officer, or any other relevant leaders.

Always remember: if you see something, do something! For product safety questions or to report product safety concerns, please contact the Product Safety Working Group: [ProductSafety@LucidMotors.com](mailto:ProductSafety@LucidMotors.com)





**What if I notice a potential, minor safety issue, but need to finish a project and reporting the issue would cause a delay? Can I wait to report?**

No. All safety concerns should be reported immediately, regardless of potential project delays.



**What if I think a safety issue is going to be very expensive to resolve?**

If you identify a safety concern, you should report it. Do not delay reporting out of concern with cost or expense. All safety concerns need to be evaluated by the company.



**What if a customer reports vehicle problems and I'm not sure whether the issue is due to a vehicle defect or a mistake on the customer's part while operating the vehicle?**

Immediately consult with your manager on next steps and whether our Product Safety Working Group and Product Safety Officer need to be contacted. Even if the issue is due to the customer's error, it's best practice to confer with our experts and leaders whenever you are unsure about an issue.

# Anti-Harassment and Anti-Discrimination

We endeavor to provide a welcoming, positive, and rewarding workplace, where members of the Lucid community are treated with dignity and respect. We do not tolerate any form of harassment or discrimination barred by the law, and do not allow retaliation against employees who report such behaviors in good faith, as set forth in the Anti-Retaliation section of this Code.

We:

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- Treat every person at Lucid with respect
  - Do not make unwelcome sexual advances, requests for sexual favors, or physical contact
  - Do not make/use online resources to share lewd, vulgar, or obscene remarks, jokes, posters, or cartoons
  - Remain vigilant for and speak up about any behavior or conduct that may violate Lucid's Anti-Harassment and Anti-Discrimination Policy
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We value the diverse perspectives, experiences, and identities of our employees who reflect the communities we serve. We are committed to Equal Opportunity Employment and we do not unlawfully discriminate in any employment decisions, including hiring, compensation, transfer, promotion, discipline, or termination.



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## What is harassment? What is discrimination?

- Harassment is severe or pervasive conduct connected to a protected characteristic and targeted at an individual or group of individuals, which creates a disrespectful, intimidating, hostile, degrading, humiliating, or offensive environment. Meanwhile, discrimination is when a person or group of persons are treated differently or unfairly based on protected characteristics.

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## Whom can I talk to about harassment or discrimination concerns?

- Your manager, your manager's manager, or another supervisor with whom you feel comfortable speaking
- Human Resources, including your Human Resource Business Partner
- Ethics & Compliance Office
- [Lucid's Integrity Helpline](#)
- If you feel comfortable enough to do so, you can also tell the person engaging in the harassing and/or discriminating behavior that their actions are not welcome and must stop

For further information on reporting channels, please review the Questions & Reporting Violations section in this Code.

03\_

## What if my manager or co-worker made a comment about my job performance that made me feel uncomfortable? Is that harassment?

- If your manager or co-worker asks you to perform tasks relevant to your job role or offers advice or critiques related to your job performance, that is generally acceptable behavior and does not fall under a protected characteristic. However, if inappropriate remarks are made which are unrelated to or in conjunction with your job role or performance that may be considered harassment, you should promptly contact your manager, Ethics & Compliance, or HR for help in determining next steps.

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## What if a direct report comes to me with a harassment or discrimination concern?

- In accordance with this Code's Responsibility of Management section, all persons in a leadership position, including supervisors, are required to act if they witness or are made aware of any harassment or discrimination in the workplace. You should therefore immediately address behavior or conduct that may be offensive and also report any potential violations to your manager, Ethics & Compliance, or HR. You should also make sure that you are supportive of your direct report, so that you are encouraging an atmosphere where everyone feels comfortable reporting potential violations.

05\_

## What if I work outside the United States and feel like I am being discriminated against or harassed? Do the same rules still apply?

- We have a global baseline expectation of respect; however, harassment and discrimination laws abroad may differ from those in the United States. The process for reporting may be different if you work outside the United States. You should promptly contact your manager, Ethics & Compliance, or HR for guidance on the rules and regulations relevant to your region.

# Confidentiality

Protecting confidential information is a key part of how we maintain our integrity and protect Lucid. Without such protection, we risk exposing business strategies to competitors, damaging our reputation and brand, and potentially creating safety risks or legal liabilities for the company. Consequently, everyone at Lucid Motors has a duty to protect confidential information, regardless of whether it belongs to Lucid or our employees, customers, or third parties. As a general rule, unless the information has been published externally through our official Lucid channels, treat it as confidential.

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Examples of confidential information include, but are not limited to:

- Internal communications or messages
- Events occurring within Lucid that have not been publicly disclosed by the company
- Board meetings materials
- Financial statements and performance information not yet publicly reported
- Payment card information
- Invention and design materials
- Business plans and strategies
- Financial results and estimates
- Product designs and concepts
- Sales goals
- Manufacturing processes and know-how
- Other trade secrets or non-public information that may be of use to competitors

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This duty to protect confidential information means that you should never discuss Lucid's confidential business or proprietary business matters or share confidential information with anyone who is not authorized by Lucid to receive it. This duty is woven throughout various policies, and includes strict compliance with our External Communications Policy, Regulation Fair Disclosure Policy and the Confidential Information and Invention Assignment Agreement employees sign.



01\_

What if I end my employment at Lucid? Am I still required to follow Lucid's confidentiality guidelines?

- Yes. Your obligation to protect and preserve Lucid's confidential data and trade secrets continues even after you end your employment with us. If you violate this, and the conduct engaged in is illegal, you may also be subject to legal action under applicable federal, state, or local law.

02\_

What if I need to disclose confidential information to a third party for a legitimate business purpose?

- If disclosure of confidential information is required for a legitimate business purpose, contact Legal to determine if a non-disclosure agreement (NDA) is in place. If there is no NDA in place, contact your supply chain manager to coordinate the negotiation and signature of an NDA. Never share any confidential information without a signed NDA.

03\_

What if I can't tell whether the information is confidential?

- If the information is not listed in the previous examples, please review our Data Classification Standard. If you are still unsure, please promptly contact our Ethics & Compliance Office.

04\_

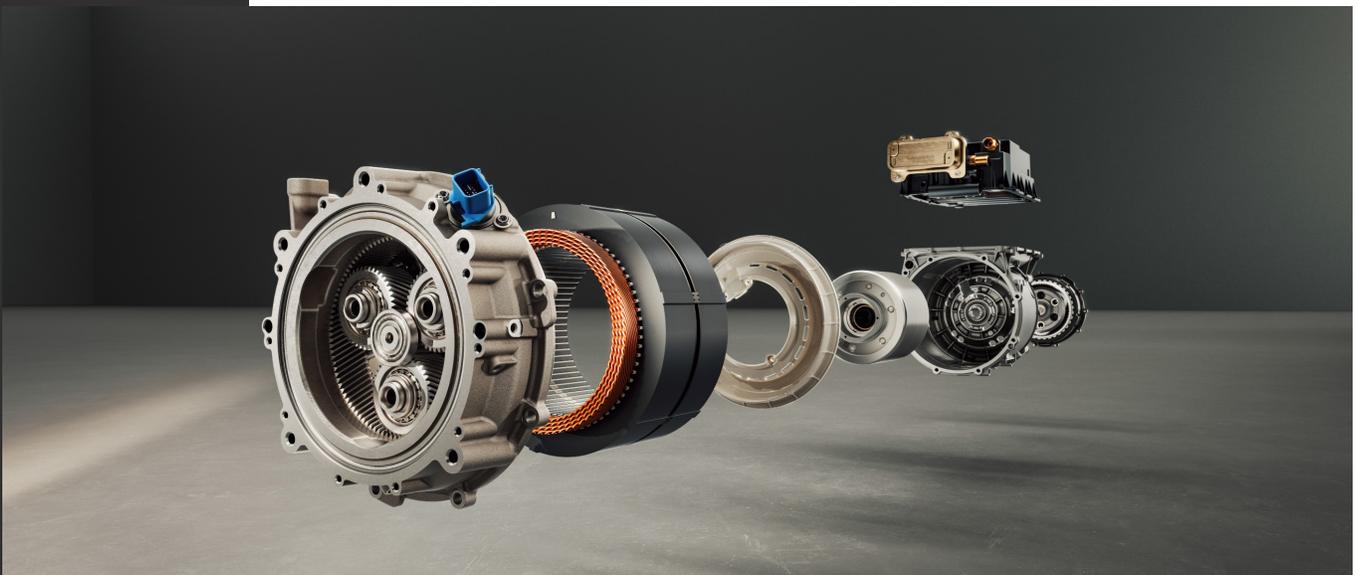
Is it possible for me to possess third-party confidential information?

- Yes. It is entirely possible that you may be in possession of third-party confidential information. To avoid accidental disclosure of such information, treat all third-party information under the same guidelines as confidential information until you are able to consult with your manager for additional guidance.

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Do Lucid's contracts contain these confidentiality guidelines?

- Yes. All Lucid standard contracts should have confidentiality clauses, which require the signatory to follow all of Lucid's confidentiality guidelines.



# Privacy and Data Security

Privacy and data security is everyone's obligation. We must always endeavor to earn and keep the trust of our customers, the general public, and each other when it comes to managing and protecting the data that Lucid generates and collects. This duty goes beyond compliance with legal obligations in terms of what is permissible and what is not. We must all undertake to deliver our products and services in a manner that honors the trust third parties have placed in us. Policies and standards for what this means are published on the Privacy and Data Security Legal Hub page, and is available to all Lucid employees. Everyone is responsible for maintaining and protecting these practices, regardless of whether the data belongs to Lucid, our employees, customers, suppliers, partners, or others with whom we do business.



## Honoring Lucid's commitment to privacy and data security means that you must:

- Handle customer data, personal data, and all Lucid data processing systems in accordance with Lucid policies and global laws
- Always be on the lookout for and report privacy or data security issues by contacting [Privacy@lucidmotors.com](mailto:Privacy@lucidmotors.com) (for Privacy issues) or [InfoSec@lucidmotors.com](mailto:InfoSec@lucidmotors.com) (for Data Security issues)
- Endeavor to integrate privacy and data security into our design and development processes
- Use personal data only to support legitimate business purposes, only for the purposes for which it was collected, and in accordance with Lucid's standards
- Transfer data to third parties only under appropriate agreements
- Share personal data within the company only with those who have a need to know
- Ask your manager when you are uncertain about what these practices mean and how to implement them

## **Why do privacy and data security matter?**

Our customers trust us with a broad range of data – including data personal to them. We must not only protect that data but also ensure that we earn our customers' trust. For example, think about your car's GPS and location information. Wouldn't you want to know that your car company handled and protected that information appropriately? Chances are you would have such expectations – as do Lucid's customers, partners, employees and others with whom we do business. If you wish to discuss any thoughts or questions on privacy and data security further, you may contact our Privacy & Data Security team at [Privacy@lucidmotors.com](mailto:Privacy@lucidmotors.com).

## **What if I accidentally emailed confidential customer data to the wrong member of my team?**

Any potential loss or disclosure of data should be immediately reported to the Ethics & Compliance Office or other approved reporting channels. For further information, please review the Questions & Reporting Violations section of this Code.



## **What if a business contact provides me with their personal information? Is that protected data under Lucid policies?**

Yes. Personally identifiable information provided by a business contact—such as business email address, phone numbers or assigned IDs—are protected under Lucid policies and should be treated in accordance with our policies and practices. For further guidance on what data is considered confidential and protected under our policies, please review the Confidentiality section of this Code.

## **What if a colleague asks you to share personal data you collected at an external seminar for Lucid?**

Do not pass this data on without consulting with your manager. As a general rule, data may only be used for the purpose for which it was communicated and should not be disclosed to others without permission from your supervisor.



# Conflicts of Interest

We must all avoid conflicts of interest to make the best choices for the company to prevent the perception of favoritism, preferential treatment, or unfair business practices. Personal interests of any nature must not interfere with an employee's job at Lucid or their ability to make objective decisions on behalf of the company, motivated by Lucid's best interests, and free from any divided loyalties. As such, it is important to avoid any situation that creates a real or perceived conflict of interest.

**While not an exhaustive list, a few examples where conflicts typically may arise are:**

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- **Employment at a Lucid competitor, vendor, or customer** – Working as an employee, consultant, advisor, or director
  - **Significant Relationships** – Relationships such as spouses, domestic partners, family members, romantic relationships, close friends, and business relationships outside of Lucid
  - **Outside Activities** – A second job (i.e., moonlighting) or service to another organization
  - **Financial Interests** – Investing in a company that does business with or competes with Lucid
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Please note that your specific role and level within Lucid may impact how a perceived or real conflict of interest is viewed. The best policy is to avoid any direct or indirect business connection with our customers, suppliers, or competitors, except on Lucid's behalf, especially if your position is a technical role or considered core to Lucid's intellectual property. For further details on your obligations in this area, please consult our Conflicts of Interest Policy.

01\_

What's the best way to proceed if I have a question about or have a conflict of interest?

- You should feel comfortable asking a question or reporting a concern using whatever channel or resource you prefer. You can trust that your question or concern will be treated seriously and dealt with promptly and as confidentially as possible. For further information on reporting a conflict of interest question or concern, please refer to the Questions and Reporting Violations section of this Code.

02\_

What if I am unsure if it is considered a conflict of interest?

- Ask yourself the following questions: Does it interfere with the work I do for Lucid? Am I using company resources, relationships, or my position for personal gain? Could it appear to be a conflict of interest to someone else? Does it compete with Lucid's interests?
- Did you answer "yes" to any of these questions? If so, ask for guidance!





# Gifts and Entertainment

**Gifts and entertainment are common in business dealings and can help Lucid to establish and maintain positive relationships with customers, vendors, and other business partners. However, they also carry the potential for abuse and can create the appearance of impropriety.**

To ensure proper conduct, Lucid requires that gifts and entertainment are legal, appropriate, reasonable under the circumstances, and infrequent. Inappropriate gifts and entertainment include things that create an obligation, are in the form of cash, or appear to be excessive or lavish. These standards apply whether you are giving or receiving a gift or entertainment associated with your connection with Lucid. More details about what is and is not permissible regarding gifts and entertainment are found in Lucid's Gift & Entertainment Policy. If you have questions about whether it is appropriate to give or receive a gift, please contact [EthicsCompliance@lucidmotors.com](mailto:EthicsCompliance@lucidmotors.com).

Lucid permits providing gifts and entertainment to government officials in extremely limited circumstances and only when permissible under applicable laws and policies. Any such gifts require pre-approval from our Compliance Officer. For more information, please consult our Gifts & Entertainment Policy and Anti-Corruption Policy.





01\_ What if I receive an offer to have my costs covered to attend a professional conference?

This is generally okay. It is considered permissible for someone to cover costs of travel and lodging so long as it's not excessive in value.

02\_ Am I allowed to accept a coffee gift card?

No. This would be considered cash or a cash equivalent and cannot be accepted as a gift.

03\_ What if I receive an invitation to a sporting event?

This is generally okay, but only if the host is also in attendance at the same event. Tickets to attend an event where the host is not in attendance should be evaluated as gifts under our policies.

04\_ Am I allowed to keep a food item, snack or bottle of alcohol?

If the item received is of a high value, it is generally okay to keep it so long as it's shared amongst colleagues or given to the corporate vault to be donated, which reduces the potential for undue influence of an individual.

# Anti-Corruption

**Our policy with respect to bribery and anti-corruption is simple and clear:**

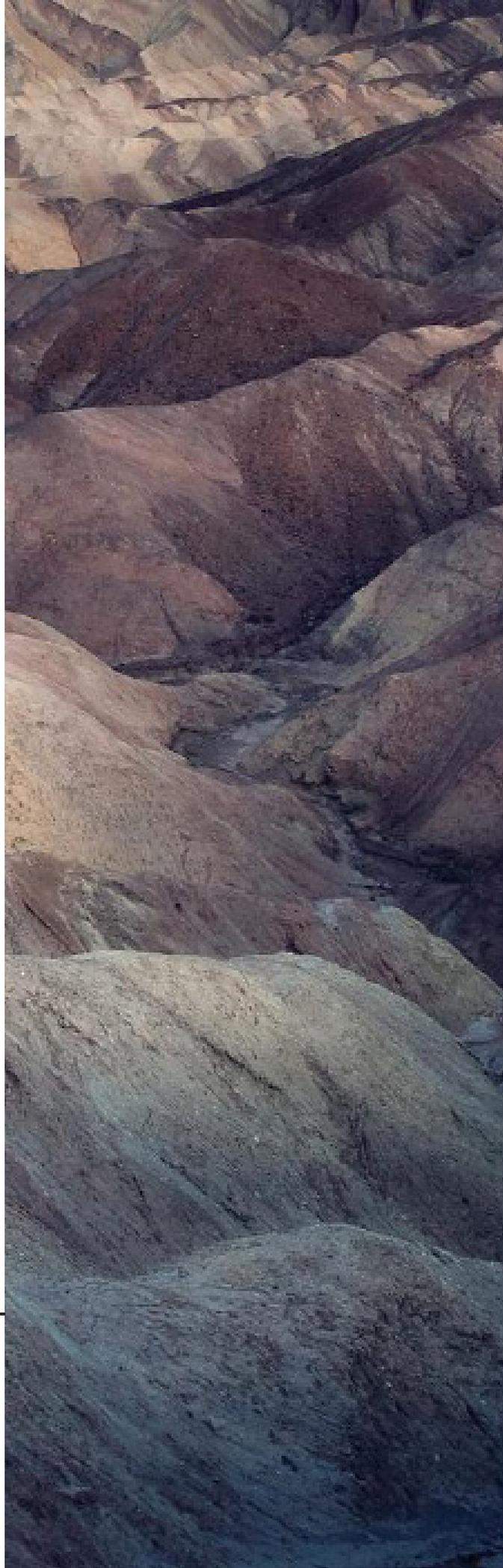
- We do not offer or accept bribes in any form
- We do not offer or accept kickbacks in any form and
- We do not tolerate corruption in any of our business dealings

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International anticorruption laws have broad jurisdictional reach and any violation of them may subject you and Lucid to substantial fines and penalties, imprisonment, debarment, loss of export privileges, or other consequences regardless of your nationality or country of residence. These laws also often overlap with other criminal statutes—meaning that both you and Lucid can face multiple charges for a single act.

Such laws forbid everyone—including businesses, private individuals, and government officials—from engaging in bribery and other corrupt acts. While some acts—such as kickbacks and facilitation payments—may be accepted practice in some countries, at Lucid they are strictly prohibited. You are individually responsible for understanding and abiding by our Anti-Corruption Policy. Any violation of this policy will result in appropriate disciplinary action.

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### **How is a bribe different than a kickback?**

A “bribe” is anything of value that’s given or offered (directly or indirectly) in an attempt to corruptly influence the actions of another and/or secure a business advantage. Bribes take many forms, including cash, equipment, travel, personal use of company property, sponsorships, apprenticeships, and job offers. For example, offering to hire a government official’s son for a summer internship at Lucid in exchange for the official helping Lucid to win contracts in the future is a bribe. “Kickbacks” are a common type of bribe, which is intended as compensation for preferential treatment, or any other type of improper services received. For example, receiving something of value from a supplier tied to the amount of Lucid business you conduct with them is a potential kickback.



# Antitrust

We compete lawfully in the marketplace. Many of the places where we operate have laws designed to encourage and protect free and fair competition amongst competitors and prohibit businesses from gaining an unfair advantage in the market. Such laws are commonly known as competition or antitrust laws and carry serious civil—and sometimes criminal—penalties for corporations and individuals who violate their mandates. At Lucid, we are committed to complying with all such laws and expect you to do the same.

Competing lawfully means that you must not:

- Enter any formal or informal agreements with competitors that limit competition in any way—including price fixing or dividing or allocating customers, territories, or contracts
- Fix or rig any bidding process, or help others to do so
- Reach agreement with competitors concerning recruitment of each other's employees or wages offered for certain roles in the industry
- Ask competitors or former employees of competitors for privileged information about that company

Competing lawfully also means that you must always remain vigilant in your external relationships—including with our customers, partners, suppliers, financial institutions, and competitors—and never share sensitive information absent approval from Legal, such as our:

- Strategies
- Business plans
- Budgets
- Forecasts
- Financial and operating information
- Pricing
- Production and inventory
- Employee salary information

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Remember that even casual conversations can be portrayed as anti-competitive conduct, so be careful about what you discuss with others. If you witness conduct that violates competition laws or are unclear about these laws and regulations, promptly contact our Ethics & Compliance team.

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What if my friend, who is an employee at a competing automobile supplier, asks me to help him decide on the retail prices for some of their products?

- Whether or not the person is a close friend, you must always refrain from providing your opinion on a competitor's product prices. If you do so, it may be construed as an informal agreement to dictate the prices charged to customers and will likely be considered a violation of antitrust laws.

02\_

What if another car manufacturer approaches me and offers to price their electric cars above a certain threshold if Lucid agrees to do the same?

- Agreements between competitors regarding prices within a certain threshold can constitute illegal price fixing and are therefore strictly prohibited under our Code. You should never agree to any such offers made by competing parties and should also promptly report such discussions to our Ethics & Compliance team.

# Third Parties

We believe in doing the right thing, even when no-one is looking, and we expect the third parties we work with to do the same. As a result, we choose third parties with the highest standard of care— be it for exceptional performance, integrity, fairness or compliance with legal and regulatory regimes. As such, we take appropriate measures to ensure third parties meet contractual requirements and follow the law and applicable Lucid policies.

This means that, if you are involved with the selection, onboarding, or monitoring of third parties, you must:

- Practice appropriate due diligence and risk reviews on third parties according to the Transaction Management Policy and Third Party Due Diligence Policy
- Select and retain third parties based on legitimate business criteria, such as cost, quality, services offered, reputation/integrity, availability, and Lucid's needs
- Treat third parties fairly and with integrity, avoid conflicts of interest, and even the appearance of impropriety

## Who is a third party?

A third party is anyone who does business with Lucid, including, but not limited to:

- Suppliers (goods, services, software or personnel)
- Consultants
- Agents
- Sales representatives
- Dealers
- Purchasers of Lucid goods or services





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What if I discover that one of our manufacturers is under investigation for accepting kickbacks? They haven't been charged so it's not an issue, right?

It is an issue. This situation could subject Lucid to reputational harm, as well as affect the manufacturers ability to serve our needs. Therefore, you should report the discovery immediately to Ethics and Compliance so that we can respond promptly.

02\_

What if I witness a third party violating safety-related protocols?

If you see something, do something! Regardless of whether the individual involved is a third party, everyone at Lucid has a responsibility to report possible safety issues, as well as other violations of our Code, policies, or the law. For reporting channels, please see the Questions and Reporting section of this Code.

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### **Related Party Transactions**

Lucid is legally obligated to review in advance certain transactions with parties related to it by virtue of common ownership, control or involvement of key personnel or directors. Failure to adhere to the guidance provided may result in disciplinary action.

# Environmental Protection and Sustainability



Lucid is committed to complying with all applicable environmental regulations, standards, and internal practices, to best protect the environment. With sustainability integrated into our core business, we strive to improve the quality and efficiency of our operations to minimize our environmental impact.

Environment, Health, and Safety (EHS) has established and implemented pertinent environmental protection policies and procedures which will be enforced.

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**What should I do if I observe an unsafe or non-compliant condition, practice, or method of working at a Lucid facility?**

Contact your manager, EHS, and/or your Human Resources Business Partner.

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# Corporate Communications

We must all exercise great care in how we connect with the public, communicate responsibly and do not allow members of our community to speak for Lucid unless they are specifically authorized to do so. We expect you to exercise good judgment and use social media in a way that is consistent with our policies and in the best interest of Lucid. This means that, unless authorized, you cannot:

- Respond to outside requests for comments or information, such as requests from the media
- Share or post our confidential information in any manner, including through social media posts, text messages, calls, and in-person meetings
- Hold yourself out as representing Lucid's views in any way – instead always be clear you are speaking for yourself and not on our behalf

As a public company, we are subject to strict requirements regarding the information that we can share and who can share such information. Therefore, violations of our communication policies may constitute grounds for disciplinary action, including dismissal.

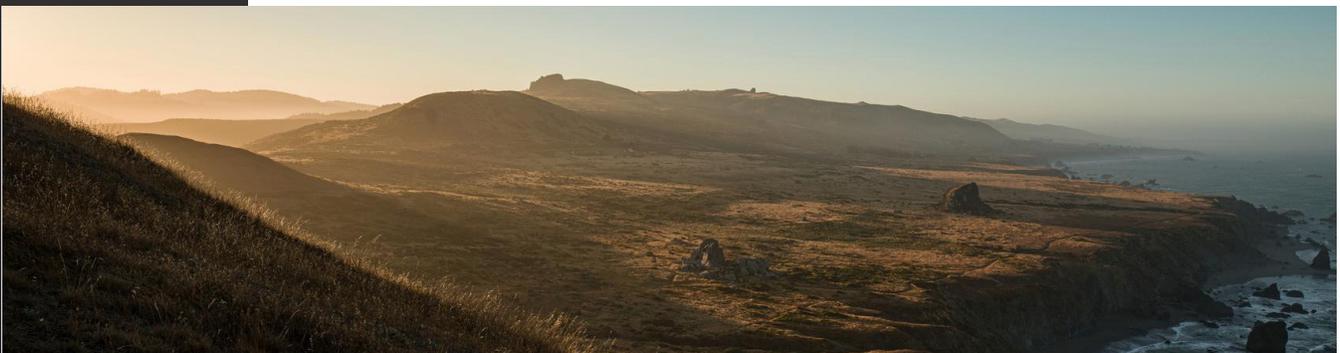
Please immediately report any violation of these policies to Ethics & Compliance at [EthicsCompliance@lucidmotors.com](mailto:EthicsCompliance@lucidmotors.com).

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## **Am I an authorized spokesperson?**

There are a limited number of individuals at Lucid who are authorized to publicly speak on our behalf. If you don't know whether you are one of these people, then you are not an authorized spokesperson.

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# Insider Trading

Through your work at Lucid, you may have access to material non-public information about Lucid or a customer, competitor, or third party. This information is considered inside information and should be considered highly confidential. Under U.S. securities laws, you may not trade Lucid securities based on inside information about a company or share that information with anyone else.

For further information about your duties regarding Confidentiality, please refer to the Confidentiality section of Code.

## **What is the impact of engaging in insider trading?**

Insider trading destroys the trust that Lucid has built with its investors, business partners, and community. As such, you cannot use non-public information you learn at Lucid to inform your trading. If you trade on the basis of insider information or provide insider information to others, you may be personally liable for civil and criminal fines and face the possibility of imprisonment. Further, employees are prohibited from, among other things, engaging in speculation, entering into derivative transactions concerning Lucid securities (including trading in non-Company-issued options or shorting), and pledging Lucid securities.

To help prevent insider trading law violations, Lucid has established trading window procedures that establish when you can and cannot trade Lucid stock. Additionally, certain individuals are required to obtain pre-clearance prior to trading even during a trading window. For more information on prohibited trading activities, trading windows, and pre-clearance requirements, please reference our Insider Trading Policy.

## **What information is considered “material non-public information”?**

Information is “material” if a reasonable investor would consider it important in deciding whether to buy, hold, or sell a company’s securities.



While not an exhaustive list, examples of material information include:

- Key changes in management
- Mergers and acquisitions
- Financial earnings or losses
- New products or projects
- Significant developments involving business relationships
- Developments in outstanding litigation

Information about a company is “non-public” if it has not been disseminated in a manner making it available to investors generally on a broad-based, non-exclusionary basis.

### **Ensuring Fair Disclosure of Information**

Employees and directors at Lucid are not permitted to make any disclosure of material non-public information to any unauthorized third parties outside of Lucid, unless the disclosure is approved by an Authorized Officer (as defined in the Regulation FD Disclosure Policy). Disclosure of material non-public information includes making any statements or disclosures that reaffirm or restate prior company guidance or that otherwise provide insight into our operations, production, or business results. Violations may constitute grounds for disciplinary action, including dismissal.

### **How to Report a Regulation FD Disclosure Concern**

See the Questions and Reporting Violations section of the Code to submit Regulation FD disclosure questions or concerns. If you receive any inbound inquiries from media or third parties, please promptly refer the inquiry to our PR team ([Media@lucidmotors.com](mailto:Media@lucidmotors.com)).

### **What areas are covered by the Regulation FD Disclosure Policy?**

- Quarterly earnings releases and related conference call participation in speeches, interviews and conferences
- Providing of “guidance” as to performance or results
- Responding to market rumors
- Reviewing analyst reports and similar materials
- Referring to or distributing analyst reports on the Company
- Postings on the Company’s website, blogs and public forums, or through social media (for example, Twitter or Facebook)
- Site visits and inspection tours

# International Business Laws



To protect our company and our brand, we cannot be a party to the movement of funds gained from illegal activity through our legitimate businesses in order to disguise its source – a process commonly known as money laundering. As a member of the Lucid community, you must flag any hallmarks of suspicious activity, including:

- Large payments in cash
- Payments made in atypical currencies outside the contract terms
- Payments made from unusual, nonbusiness accounts
- Transactions occurring in an unusual pattern

## **Sanctions**

As a global company, we are subject to a number of trade compliance laws, such as export/import controls and economic sanctions. Here at Lucid, we are committed to our obligations under these laws and trade with integrity.

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### **What are export/import controls?**

Export/import controls regulate where and with whom we can do business. These laws vary widely around the world and the laws of more than one country may govern a particular transaction. Failure to comply with these laws may seriously impact Lucid's business and reputation.

### **What if a new international customer is interested in buying Lucid vehicles but the end customer is in a country subject to broad economic sanctions?**

In many cases, Lucid cannot sell to a customer if we know or have reason to believe the goods are intended for a sanctioned country.

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# Occupational Health and Safety

Lucid is committed to providing a safe and healthy work environment for personnel. Lucid facilities utilize equipment and materials with known hazards; precautions are implemented to manage these hazards. Lucid vehicles are also utilized throughout our facilities and caution must be taken. During vehicle use, personnel should never speed while driving, drive without a seatbelt, disobey traffic laws, or drive while impaired by drugs or alcohol.

Environment, Health, and Safety (EHS) has established and implemented pertinent policies and procedures which must be followed. Lucid reserves the right to discipline any personnel whose performance regarding EHS is unsatisfactory or whose conduct in or related to EHS has or may have a detrimental effect on Lucid's goals, customers, personnel, and/or reputation. Failure to follow policies and procedures may result in disciplinary action, including termination and immediate removal from the property.

01\_

What should I do if I observe an unsafe or non-compliant condition, practice, or method of working at a Lucid facility?

- Contact your manager, EHS, and/or your Human Resources Business Partner.

02\_

Who should I contact if there is an emergency (i.e., medical, chemical spill, fire)?

- Contact the Security Operations Center (SOC) immediately at: (510) 298-0746. Security will respond and notify the appropriate personnel.

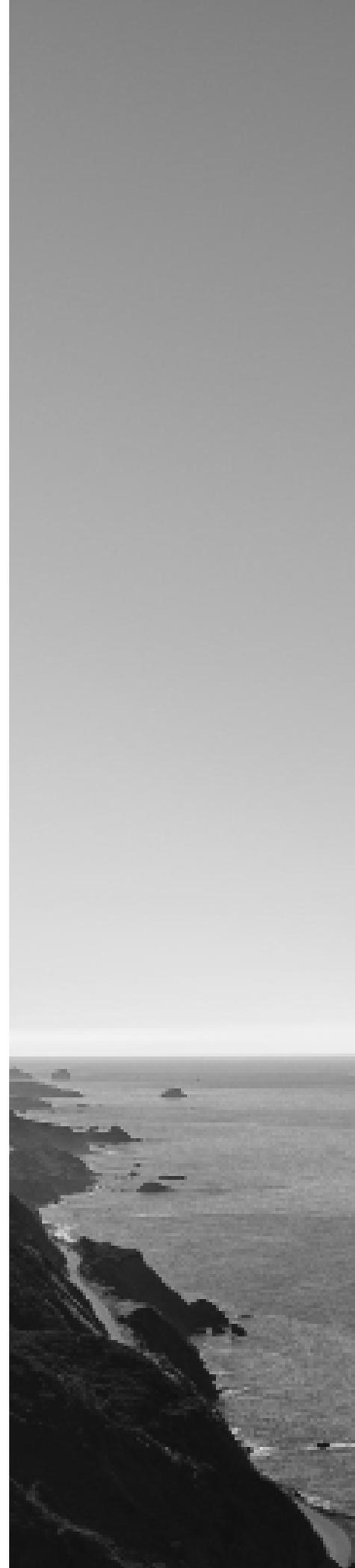


# Accurate Recordkeeping and Financial Reporting

At Lucid, timely and accurate recordkeeping and financial reporting is not only a legal obligation, but also key to our business success and at the core of our commitment to operate honestly, ethically, and with integrity. As such, we are committed to maintaining books and records that accurately reflect our business and financial situation, and expect you to do the same.

In order to ensure timely, accurate recordkeeping and financial reporting you must always:

- Consult with your manager to ensure you are aware of all financial reporting responsibilities, including any special obligations relevant to your position
- Accurately report business transactions and expenditures
- Create and maintain truthful, clear, and accurate financial records
- Preserve, retain, and securely dispose of records according to our retention practices and applicable laws
- Watch out for and immediately report any signs of potential fraud, bribery, or money laundering activity to our Ethics & Compliance team



01\_

### What happens when our records are manipulated?

- Manipulation of company records and financial reports erodes the integrity of our records, harms the success of our business, and opens Lucid up to serious legal repercussions. If you engage in any type of fraud—including record manipulation—you will be subject to disciplinary action by Lucid, which may include termination. You may also face serious legal consequences.
- It is the obligation of every Lucid employee to ensure accurate recordkeeping and financial reporting and to report any concerns of non-compliance.

02\_

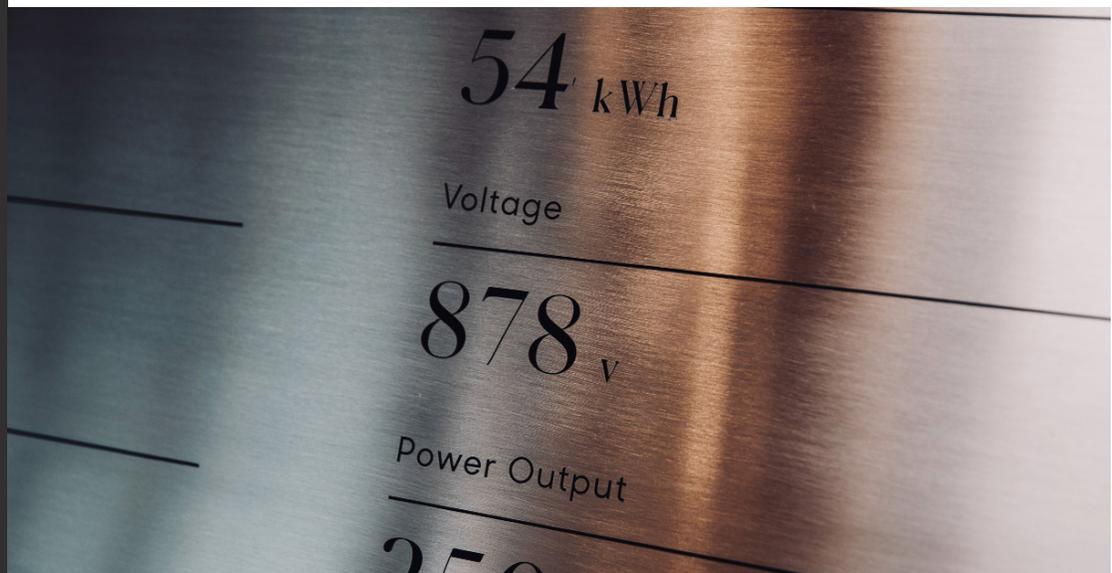
### What if I'm instructed to break apart a purchase order by the type of work associated with it? Is that allowed?

- No, that is not allowed. This is a form of purchase order splitting — i.e. splitting large orders across multiple purchase orders — which circumvents the requisition and buyer approval controls we have in place to protect against non-compliant purchases and fraud. If anyone instructs you to split an order you should refrain from doing so and immediately bring it to the attention of our Ethics & Compliance office.

03\_

### What if I do not clearly mark business expenditures while recording them?

- You should always clearly label business expenditures and never put a label that conceals the true nature of the expense. Accurately labeled business records help us stay out of trouble because we always know where and to whom company money goes.





# Company Assets

It is your responsibility to make sure that all company assets are used responsibly, for legitimate business purposes, and in compliance with our policies. This responsibility extends to all physical assets (i.e., equipment, machinery, tooling, vehicle parts, facilities, etc.), electronic assets (i.e., systems, devices, networks, programs, etc.), proprietary information, and other data owned by Lucid. This responsibility includes misuse of company assets and information, such as: plugging in suspicious USB drives into company machines; downloading unauthorized content from the internet; using or sharing company data outside of the company.

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Keep in mind that the above items, as well as anything you create, store, download, send, or receive using our systems or via company provided applications, is Lucid property and can be reviewed by the Company at any time, as permitted by applicable law.

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01\_

What if I store personal photos on my work cell phone? Is Lucid allowed to view those items?

- Yes. Lucid is allowed to review all information and material transmitted or stored on company assets, regardless of whether they are personal.

02\_

What if I have access to a celebrity customer's profile and want to share their mailing address with a friend who's a huge fan?

- Sharing customer data, as well as any other information owned by Lucid, for any reason other than a legitimate business purpose is strictly prohibited. You may have access to valuable data such as celebrity mailing addresses, but you must not take advantage of that access.

03\_

What if a coworker arranged to bring their personal car into a Lucid repair shop and asked me to assist with a brake repair. Is this allowed?

- No. Our buildings, tools, and equipment are company assets to be used for our customers and other legitimate business purposes only—not for personal use.

04\_

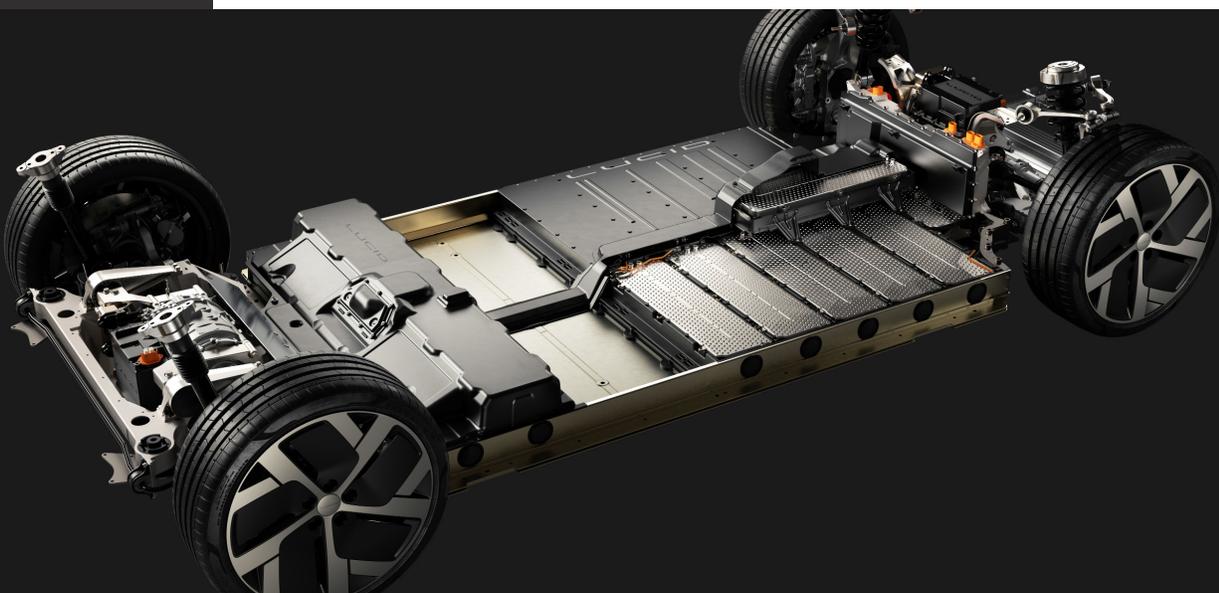
What if someone stole my work laptop?

- All lost or stolen data, equipment (including removable media), computers, laptops, and mobile computing devices must be reported as soon as possible and no later than 24 hours after an incident to Information Security at [InfoSec@lucidmotors.com](mailto:InfoSec@lucidmotors.com) or the IT Help Desk at [HelpDesk@lucidmotors.com](mailto:HelpDesk@lucidmotors.com) or (510) 671-5624.

05\_

What happens if I misuse company assets?

- At Lucid, we regularly monitor all company assets to ensure their safety and that you are complying with our policies. Failure to comply with these policies or purposeful misuse of our assets will result in disciplinary action, which may include termination.



# Charitable Contributions

At Lucid, we are passionate in showing our support for charitable causes, so long as donations are made on a voluntary basis and never for the purpose of securing an improper advantage. In order to prevent conflicts of interest, improper advantages, and other legal violations from occurring, all charitable contributions made on Lucid's behalf must be pre-approved via the Gift and Entertainment Pre-Clearance Form and by Legal and Finance.



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**01\_** What if I want to make a donation to a local charity I support? Do I need to ask Legal and Finance for permission to donate?

Charitable donations made using personal funds are permissible and do not require pre-approval from Legal and Finance.

**02\_** I know that a charity I regularly donate to is looking for an outdoor space to host an upcoming fundraising event this weekend. Can I offer them the use of my office's parking lot?

You cannot donate any company resources—including office spaces, parking lots, or other properties owned by Lucid—to personally support charitable causes. This remains true even if company resources are not currently being used or occupied.

**03\_** What if I want to make a personal donation to a local election campaign? Doesn't that count as a charitable contribution?

No. Under this Code, personal political contributions are not the same as charitable contributions and are not governed by the same guidelines. For guidance on rules governing political contributions, please review the Political Engagement section of this Code.

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# Political Engagement

As a company, we will lawfully and transparently engage in the political process to protect and advance Lucid's interest. Employees' personal political activity must remain separate from Lucid, including but not limited to: public expression of a political position, support for a political party or candidate or general opinion on issues of public policy. You may not use Lucid's name, company resources (including IT resources such as company email) or company funds to advance your personal political activity. This means that you must:

- Undertake personal political activities on your own time, with your own resources, and at your own expense
- Be clear in such activities that your participation is your own choice and unrelated to Lucid and never use your affiliation with Lucid to imply that you are speaking on behalf of the company
- Ensure that any personal donations are made in accordance with our policies

01\_

## What does political engagement mean?

- Under this Code, "political engagement" is defined as engaging in political activities, such as lobbying and meeting with individuals who are, or will be, in a political office. Other activities include, but are not limited to, voter registration drives, running for public office, ballot measure or referendum activity, or supporting any non-ministerial action or inaction taken by a public official.

02\_

## What if I'm interested in running for a political position?

- Individuals at Lucid who are interested in running for political positions—such as local office or school board—are allowed to run so long as it remains separate from your work at Lucid. However, political involvement is governed by specific laws and is often a highly regulated area, so if you are considering becoming politically involved, you must contact our Legal team prior to declaring your candidacy.

03\_

## What if I give a local political candidate my Lucid business card at a fundraising event?

- This type of conduct is prohibited. Handing out Lucid business cards, apparel, or any of our other branded items during a political engagement can create the sense that you are there to represent us, which is in violation of our policies.

04\_

## What if, in my personal time, I want to lobby my local representative on an issue for Lucid? Is that allowed?

- Any type of political involvement on our behalf—including donations and lobbying—requires written approval from our Policy or Legal team, which you may contact at: [legal@lucidmotors.com](mailto:legal@lucidmotors.com).

05\_

## What if I want to share information for an upcoming political fundraiser with some of my coworkers who asked me to email them details? Can I email the information to them using my Lucid email?

- No. Internal communication channels are a Lucid resource and therefore, may not be used for personal political activities such as this.

# Questions and Reporting Violations

## **If you see something, do something.**

A key part of operating honestly, ethically, and with integrity is exercising good judgment. This means asking questions whenever you are unsure about an issue and sharing your concerns when you see or suspect something that could harm Lucid or another individual. Therefore, when you have questions about, suspect, or see misconduct that violates the law, our Code, or our policies, it's important to act and do something about it.

## **What's the best way to proceed if I have a question about, suspect, or see misconduct?**

- **Let your manager know:** Share your questions and concerns with your manager. All Lucid managers have an open-door policy and often, they will be able to offer guidance and answer any questions
- **Call our Helpline:** The Lucid Integrity Hotline is for all Lucid employees and non-employees. You may ask questions or report concerns here, while also remaining anonymous. The number for the Helpline is (800) 461-9330
  - *Please note: if located outside the United States, you must go to the webpage and select your country for more instructions*
- **Online:** The [Lucid Integrity Helpline](#) also has a webpage where reports and questions may be submitted anonymously
- **Email Lucid's Ethics & Compliance Office:** [EthicsCompliance@lucidmotors.com](mailto:EthicsCompliance@lucidmotors.com)

You should feel comfortable asking a question or reporting a concern using whatever channel or resource you prefer. You can trust that your question or concern will be treated seriously and dealt with promptly and as confidentially as possible.





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01\_

What if I want to report suspicious activity about a coworker, but I'm scared they will find out that I made a report about them?

When investigating reports of suspected misconduct, Lucid treats all information confidentially and only shares information—including names of the person who reported—on a need-to-know basis.

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# Investigation of Possible Violations

Lucid regularly conducts confidential investigations into possible violations of laws, regulations, policies and this Code. Upon request, all Lucid personnel are required to cooperate in such investigations, to promptly respond to investigators' requests for information, and to be forthright, truthful and honest when providing such responses.

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## 01\_ What if Human Resources asks me to participate in an internal investigation within Lucid? Do I need to cooperate?

Yes. You are required to cooperate and tell the truth in all internal investigations. Failure to do so is considered a violation of this Code and may result in disciplinary action, including termination.

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# Anti-Retaliation Policy

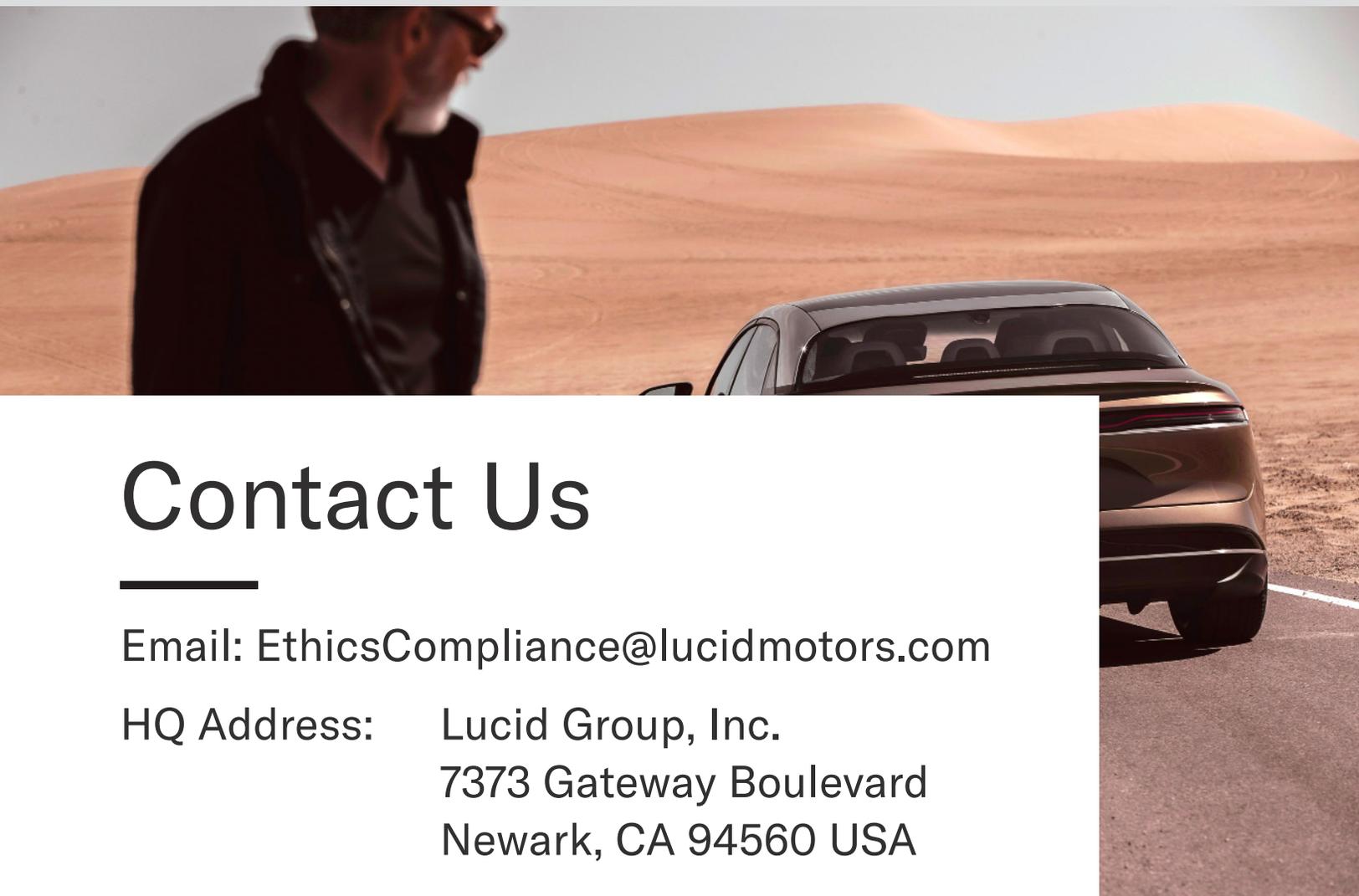


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Lucid is committed to providing a welcoming, positive, and rewarding workplace, where members of the Lucid community feel empowered to speak up and share their concerns freely. We do not allow unlawful retaliation against anyone who engages in good faith reporting of concerns that might arise to violations of this Code or who participates in the investigation of such possible violations.

If you feel that you have been retaliated against in violation of the above principles, please report it promptly to the Ethics & Compliance office or report the issue through the channels listed above.

# Code of Business Conduct and Ethics



## Contact Us

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Email: [EthicsCompliance@lucidmotors.com](mailto:EthicsCompliance@lucidmotors.com)

HQ Address: Lucid Group, Inc.  
7373 Gateway Boulevard  
Newark, CA 94560 USA

**LUCID**

[www.lucidmotors.com](http://www.lucidmotors.com)