# **Rivian Human Rights Policy**

# Introduction

Rivian is committed to building a world that future generations deserve. This includes leading the world to transition towards sustainable energy while respecting the human rights of all individuals. This Human Rights Policy details our commitments to the people and communities connected to our operations directly and indirectly who help us achieve our goals. These commitments are intended to address, mitigate and remediate the human rights impacts of our business.

## Scope

Upholding human rights requires us to examine every aspect of our business, from the mines that produce minerals for our vehicles, to the workers at the supplier sites that assemble our vehicle parts, to the offices that manage our operations, to our test labs, spaces, service centers and charging stations, which are all interconnected by thousands of employees and business partners around the globe. This Policy has an impact on Rivian's complete value chain, including our suppliers, business partners, the local communities in which we operate, our employees, our customers and all individuals linked to Rivian's products. We strive to work together for a more sustainable future, and we are embedding the principles of this Human Rights Policy in our operations and value chain. We commit to continually working to improve our human rights practices across our business, including our supply chains. Our suppliers are encouraged to adopt a similar approach to continual improvement, as they address human rights risks within their operations and supply chains.

Throughout this Policy, references to "employees" should be construed broadly to apply to everyone who works on Rivian's behalf, including full- and part-time employees, consultants, contractors, temporary staff and the Rivian Board of Directors.

"Suppliers and other business partners" refer to any third party that provides goods or services to Rivian for compensation. It includes suppliers and other business partners' workers.

"Workers" include workers of all kinds employed by Rivian suppliers and other business partners, including full- and part-time, consultants, contractors, temporary staff and those employed via labor agents.

Rivian is committed to respecting human rights as outlined in:

- The United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The International Bill of Human Rights, which refers to the Universal Declaration of Human Rights, The International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights
- The ILO Declaration on Fundamental Principles and Rights at Work
- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- The Automotive Sustainability Guiding Principles

We expect our employees, suppliers, and other business partners to follow these international human rights standards and comply with the applicable laws wherever they operate. Where the law and international human rights standards differ, Rivian will uphold the higher standard where permitted by law. We require the same from our suppliers and business partners. These expectations have been incorporated into our



1

Supplier Code of Conduct and our Code of Business Conduct and Ethics.

# **Prioritized Human Rights Risks**

To fulfill our responsibility as a business to uphold human rights, we have identified human rights risks in our operations and supply chain through research as well as internal and external expert consultations. This initial screening resulted in the following list of prioritized human rights risks.

We will focus our due diligence efforts on addressing these prioritized risks across our business and value chain. We intend to validate and update this initial list through a formal risk assessment.

#### **Forced Labor**

We do not tolerate modern slavery or forced labor, including but not limited to forced, bonded, indentured and involuntary prison labor, and human trafficking. All labor in our operations and supply chain must be voluntary, and employees and workers must be allowed freedom of movement. Conditions of employment must allow for complete freedom of mobility. Suppliers cannot retain individuals' identity documents. Neither employees nor workers shall pay recruitment fees or any other form of remuneration to secure employment.

#### **Child Labor**

We oppose any form of child labor. Rivian prevents child labor in our own operations, and we expect suppliers and other business partners to do the same, as well as take actions to verify that the age of employment for young workers meets or exceeds legal regulations and local labor laws throughout the supply chain. Suppliers shall have practices in place to prevent the recruitment of child labor and implement policies in which the age of labor shall always be the higher of national legislation or 15 years old, except that suppliers may use legitimate and properly managed apprenticeship programs, such as student internship programs, that comply with local law. Young workers between the ages of 15 and 18 shall not be assigned work that interferes with compulsory education, nor endangers their mental, emotional or physical health and development.

#### **Data Management & Privacy**

Keeping personal information secure is critical to our employees, our customers, our business and our reputation. We take seriously our obligations to protect the privacy of all individuals in our value chain. We collect, use and process any personal information only for legitimate business purposes and protect it from possible loss, misuse or disclosure.

Rivian's Privacy Policies govern our Company-wide use of Personal Information (PI) and we comply with our legal obligations to protect PI from unauthorized disclosure. Those Rivian employees who process PI are required to do so only in an authorized manner and are subject to confidentiality. Before processing any data, Rivian personnel are required to undergo Data Privacy and Cybersecurity training to ensure responsible data management.

Employees must report any unauthorized use, leak or loss of PI promptly to the Rivian Cybersecurity team. We expect employees and workers to observe all applicable data privacy laws and our contractual terms when collecting, storing, using, processing or sharing PI.

We regularly review our procedures and systems to continuously improve data protection for our employees and customers and expect the same from our suppliers and other business partners.



#### Health and Safety

We support the health and safety of all our employees and workers throughout the supply chain. We prioritize compliance with safety requirements related to planning and operations to prevent and mitigate accidents, incidents, injuries, near misses, work-related illnesses and unsafe conditions, and to meet applicable health and safety laws, regulations and requirements, and expect suppliers and other business partners to do the same. We implement protective measures for our employees from the moment they join the Rivian team. Upon onboarding, all employees are expected to complete safety training. Our manufacturing employees complete an intense multi-week program to ensure health and safety protocols are properly observed and to promote a safe working environment for all.

## **Collective Bargaining and Freedom of Association**

We recognize the right to freedom of association and collective bargaining. We will not discriminate against anyone for, or interfere with, participation or the choice not to participate in any association. We recognize the right of employees and workers in our supply chain to be represented by trade unions or other representatives while adhering to local legislation.

#### **Discrimination, Harassment and Abuse**

Everyone at Rivian and all workers at our suppliers and other business partners are entitled to work in an environment that is free of harassment, bullying, discrimination and retaliation. We do not tolerate discrimination or harassment in any form, including any conduct or comments that create, encourage or permit an offensive or intimidating work environment. This includes verbal or physical harassment, racism, sexism, bullying, sexual harassment, retaliation, inappropriate humor, mistreatment of others based upon their personal characteristics, beliefs or membership in a protected class or other actions that offend or cause distress.

#### Environmental Impacts and Negative Consequences to Local Communities

As we work to support the transition to sustainable energy and environmental practices, we expect all business operations to comply with applicable environmental protection legislation and related internal requirements. We seek continual improvements in resource and energy efficiency, sustainable sourcing of materials and minimization of waste generation, including air, noise and water emissions.

The wellbeing of people and our planet are inextricably linked, and we strive to protect our employees and workers in our supply chain in our endeavor to improve our environmental management. In furtherance of these goals, we expect all business practices to minimize any adverse effects on local communities and safeguard health and safety.

## Critical Minerals, including Conflict Minerals

Helping the world transition toward sustainable and responsibly sourced energy requires raw materials, many of which are mined minerals. We are committed to developing supply chain practices that prevent or mitigate and remediate negative environmental and human rights impacts. This ambition requires us to closely collaborate with suppliers and other interested parties including through multistakeholder initiatives with non-governmental organizations, government, civil society and other partners on addressing human rights impacts upstream of our supply chain through mapping and transparency initiatives and engagements with communities where minerals are sourced. We expect suppliers to share this vision, work collaboratively to conduct responsible supply chain management and take extra care to address negative human rights impacts, including when materials are sourced from conflict-affected and high-risk areas.

## Governance and Integration of Our Commitment

We aim to integrate respect for human rights across our operations and throughout our value chain. As part



of this process, we commit to conducting human rights due diligence in accordance with the UN Guiding Principles on Business and Human Rights. In addition, we are building out and aim to strengthen our riskbased approach over time to prevent, mitigate and remediate negative human rights impacts of our business.

We strive to:

- Incorporate human rights into our decision-making practices, policies and procedures for all business functions, and expect that our suppliers and other business partners continue to strengthen human rights in their operations;
- Identify and assess human rights impacts in our operations and across our value chain on an ongoing basis, and expect our suppliers and other business partners to do the same;
- Implement measures to reduce negative human rights impacts;
- Track the effectiveness of our human rights practices;
- Communicate the policies and practices used to uphold our commitment to human rights to internal and external stakeholders; and
- Provide access to remedy for known human rights violations.

#### Governance

The protection of human rights is a core consideration in the way we conduct business. Implementing and enforcing this Human Rights Policy is all of our responsibility. Our Board of Directors' Planet and Policy Committee oversees sustainability at Rivian, including human rights. Accountability on human rights commitments is integrated through our ESG Steering Committee. People (including EHS), Sustainability, Legal, IT, and Software teams work together to identify and address human rights risks to our employees. This includes oversight of our Ethics Hotline. Our Legal team reviews this Policy to assess its compliance with legal and regulatory requirements. Our Operations team, including our Supply Chain team, manages the selection, onboarding and ongoing management of Rivian's suppliers. Our Sustainability team oversees the development of strategies, deployment of industry tools and cross-functional management of activities to mitigate human rights risks in our supply chain through our Responsible Sourcing Program. Our Cybersecurity & Privacy teams mitigate risks related to privacy and data management, including cybersecurity threats.

#### Integration of Our Human Rights Commitments

We provide compliance and function-specific training to employees upon onboarding, including Health and Safety; Diversity, Equity and Inclusion; Harassment and Discrimination, Data Privacy, Data Protection and the Code of Business Conduct and Ethics. Where there are potential or actual human rights violations in our operations, employees are encouraged to use the channel they are most comfortable with, including our Ethics Hotline, to report concerns (see Reporting Mechanisms below). We will provide human rights training to our employees to strengthen their understanding of our human rights commitment, our prioritized risks and impacts and employees' roles in respecting human rights.

We are committed to continually improving our systems. We intend to partner with our global network of suppliers and other business partners to commit to and uphold our values, high standards of integrity and operating principles. We commit to embedding this Human Rights Policy into contracts with our business partners and ensure that our commitment is reflected in our business planning, roles and responsibilities across our organization. This Policy complements our Supplier Code of Conduct, which outlines our expectations of suppliers pertaining to ethical standards and business practices, particularly in labor rights, human rights and the environment. Our teams work cross-functionally to monitor compliance with our policies and to support our suppliers and other business partners with corrective actions and remediation should non-compliance occur. Suppliers must agree to abide by these policies. We encourage all of our business partners to exercise human rights due diligence to



identify, prevent, mitigate and remedy human rights abuses in their operations and supply chains, and to work towards continual improvement.

# **Engaging with Stakeholders**

As we conduct human rights due diligence, we seek to engage with stakeholders, including potentially affected groups, to inform our identification of key risks and verify whether our measures are effectively addressing human rights. The effectiveness of our human rights due diligence depends on our relationships with stakeholders.

We have joined several key industry and multi-stakeholder initiatives to strengthen our practices and further industry-wide efforts to respect human rights:

- Initiative for Responsible Mining Assurance (IRMA): Offers independent third-party verification and certification for global industrial scale mining sites.
- **Responsible Business Alliance (RBA)**: Improves efficiency and responsible sourcing through Supplier Codes of Conduct, audits, and corrective action plan management.
- Public Private Alliance for Responsible Minerals Trade (PPA): Bolsters progress on responsible sourcing specifically for tin, tantalum, tungsten, and gold in the Great Lakes Region of Africa; as well as cobalt and other critical minerals in Conflict-Affected and High-Risk Areas beyond the Great Lakes Region of Africa.
- United Nations Global Compact: Drives progress on the UN Sustainable Development Goals (SDGs).

# **Reporting Mechanisms**

Employees and workers should feel empowered to report concerns anonymously and without retaliation and should understand how their concerns will be addressed. Our Ethics Hotline provides employees with a channel to report concerns. Our teams review each concern and work to investigate and resolve them promptly. Rivian does not tolerate retaliation against individuals reporting concerns or cooperating in investigations.

The Ethics Hotline is detailed in our Business Code of Conduct and Ethics and can be accessed online at http://www.rivian.ethicspoint.com/ or via phone number at 1-844-986-1441.

Rivian has an Open Door Policy and encourages individuals to actively participate in discussions surrounding workplace decisions and environment affecting them and their professional responsibilities. Employees are encouraged to raise concerns with their immediate supervisor or other management or channel of their choice, who will escalate concerns on their behalf where appropriate.

Additionally, we encourage that:

- Issues related to our products or website be reported at vulnerability@rivian.com;
- Suspected cybersecurity and privacy issues be reported at cybersecurity@rivian.com;
- Customers with concerns around the processing of Personal Data can contact us at privacy@rivian.com.

Access to reporting mechanisms for workers across our value chain can provide critical insight into human rights impacts throughout our business and help us establish appropriate prevention, mitigation and remediation measures. We encourage all suppliers and other business partners to implement their own reporting mechanisms.



# **Communication & Transparency**

This Human Rights Policy is available to the public on the Rivian website and is posted publicly at key sites, where it is translated into applicable languages. We also report on our commitments and actions in our annual Impact Report.

Rivian utilizes publicly-available policies to reinforce this Policy, including:

- Rivian Code of Business Conduct and Ethics
- Rivian Supplier Code of Conduct

Rivian plans to provide updates on our progress to uphold this Policy in our annual Impact Report and review our policies annually to reflect our evolving human rights practices.

This Policy was developed with the support of third-party experts following their review of Rivian's human rights due diligence processes for our operations and value chain, input from senior Rivian leadership and an analysis of risks inherent in the automotive industry and Rivian's key sourcing regions.

## Date: 1/7/2024 Approved by the Planet and Policy Committee of the Board of Directors on February 8, 2024

