



# Code of Business Conduct and Ethics



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# Message from the CEO



RJ Scaringe  
Founder and CEO, Rivian

**Our Code represents the basic principles that we expect all directors, officers, leaders and employees to follow.**

Thank you for putting your heart and soul into building Rivian. My commitment to you is that I'll work tirelessly to make sure Rivian remains a place where you feel supported and deeply inspired to do incredible work.

Our Code of Business Conduct and Ethics (the "Code") reflects this commitment. As I've said before, technology fades, and product positioning can be copied—our people and the way we work together are critical and sustainable competitive advantages. Our products, organization and ambitions require diverse thinkers and builders with different skill sets and backgrounds.

As we grow, it is more important than ever that we remain aligned around our core values and behaviors. We must continue to treat people like people, collaborate with respect and dignity, comply with the law and conduct our business with the utmost integrity.

Please be courageous and speak up if you witness any failure to uphold this Code or potential misconduct in any form. There are many ways to do this: reach out to your manager, the Ethics and Compliance Team, the Legal Team, People Partners, or make a confidential report using our Rivian Ethics Hotline.

Our Code represents the basic principles that we expect all directors, officers, leaders and employees to follow. Really it comes down to you: make ethical business decisions, use good judgment, and raise concerns if you hear or see anything unusual.

Thank you for all you do,

**RJ**

# Introduction and overview

## Why do we have a code?

It is core to who we are as a company to conduct business ethically and in compliance with the law. This is the right thing to do, builds trust with our customers and helps us avoid situations that might lead to adverse legal consequences or damage to our hard-earned reputation. This Code of Business Conduct and Ethics (our “Code”) sets forth the expectations for how we do business. It’s what we stand for and what we expect from ourselves, each other and those with whom we do business.

## Does the Code apply to everyone at Rivian?

Yes. Any reference to “employees” in this Code should be construed broadly to apply to everyone who works on Rivian’s behalf, including full- and part-time employees, consultants, contractors, temporary staff, senior management and the Rivian Board of Directors, as applicable. This Code applies to all companies within the Rivian group, including all subsidiaries throughout the world. When we speak of “Rivian” or the “Company,” we are referring to each and every member of the Rivian group of companies. We refer to our principal executives, financial officers and controllers, or persons performing similar functions, as our “principal financial officers.”

## Managers have special responsibilities under our Code

It is not enough for managers and supervisors to just understand and adhere to the Code. You also have an obligation to inspire others to act with integrity and serve as a resource for employees with questions or concerns.

## What if I fail to follow the Code?

You may be disciplined, up to and including termination, and/or face substantial civil damages and/or criminal charges. Your failure to adhere to our Code could also result in fines to the Company, lawsuits or investigations, and damage to our reputation.

## What if I don’t find an answer in the Code?

**The Code contains rules and principles for how we do business. It can’t, however, describe every potential situation that might arise, and sometimes the right answer is not obvious. If you are ever in doubt about a course of action, ask yourself:**

- **Is it against the law?**
- **Is it unethical?**
- **Could it damage Rivian’s reputation?**
- **Would I be embarrassed to read about it in the media?**
- **Would I be embarrassed to speak to senior leadership about it?**

If your answer to any of the above is “yes,” stop and reach out to your manager, the Ethics and Compliance Team, the Legal Team, or your People Partner or submit a question to the [RIVIAN Ethics Hotline](https://www.rivian.ethicspoint.com) at 1-844-986-1441 or through our dedicated website at [www.rivian.ethicspoint.com](https://www.rivian.ethicspoint.com). Speak up and use the channel that you are most comfortable with to raise your concerns. The Ethics and Compliance Team will provide you with advice and guidance if the requirements of our Code seem unclear.

## Your rights as an employee

While we expect you to follow our Code, we also recognize your rights as an employee. For example, you have the right to speak publicly about matters of public concern or to participate in certain activities related to the terms and conditions of your employment (including discussions about wages, hours, working conditions, health hazards and safety issues). Nothing in this Code or in any Company policy is intended to limit or interfere with your rights under the law.

# We follow all laws and regulations



Following local, state and federal laws is fundamental to how we do business at Rivian.

## Overview

At Rivian, we pride ourselves on doing what's right, and we follow the law. That means we obey the law in every country where we do business. Beyond that, it means we stay true to our own values by acting with integrity, being globally responsible, and following a consistent set of ethical standards around the world.

Laws touch all aspects of our business at Rivian, from how we make, market, promote and sell our vehicles, to how we treat one another. Each one of us is individually accountable for respecting and following the laws everywhere where we operate. That doesn't mean you have to know the details of every law in every country. Here are two simple guidelines that will help you:

- If a local law conflicts with our Code, you must comply with the law.
- If a local custom conflicts with our Code, you must comply with the Code.

Following local, state and federal laws is fundamental to how we do business at Rivian. We are obligated to follow all relevant laws, and all provisions of this Code are subject to legal requirements. To the extent that any provision is deemed invalid under local, state, regional, provincial or country law, the remainder of the Code remains valid and enforceable.

# We're in this together



**Thank you for upholding our commitment to do the right thing**

We stay true to our Rivian compass values by acting with integrity, using good judgment and following a consistent set of ethical business standards everywhere we do business. Our Code outlines the basic principles that we expect everyone at Rivian to follow and the general expectations for how we do business.

Our Code is what we stand for and what we expect from ourselves, each other, and those with whom we do business. Creating a safe, inspiring environment is a daily practice, and it will take each and every one of us to make sure Rivian continues its growth trajectory.

Let us know if you witness or experience any potential violations of our Code. When you speak up, you're helping everyone at Rivian.

**You have an obligation to raise a concern if you hear or see anything unusual or questionable. Reach out via our [Rivian Ethics Hotline](https://www.rivian.ethicspoint.com) at 1-844-986-1441 or through our dedicated website at [www.rivian.ethicspoint.com](https://www.rivian.ethicspoint.com). All reports may be made anonymously, where permitted by law.**

# After a report is received

## Overview

All reports of suspected misconduct will be reviewed, appropriately investigated, and treated confidentially to the extent possible given Rivian's need to conduct an investigation and follow up on any concerns. You are expected to cooperate in any investigation and keep the contents of any investigation confidential. You should never conduct your own investigation.

When you stand up for what's right and speak up, you're helping everyone. That is why we never tolerate retaliation against anyone who raises a concern in good faith, whether or not the information or allegation is ultimately determined to violate policy or law.

## Our commitment to non-retaliation

Our commitment to non-retaliation extends to anyone who cooperates in any investigation or inquiry regarding such conduct. If you feel you have been retaliated against or suspect retaliation against someone else, report it to the Legal Team, the Ethics and Compliance Team, your People Partner or Rivian's Ethics Hotline. Rivian will follow up and investigate the matter. Anyone found to have engaged in retaliation will be subject to disciplinary action.

### Question:

What does it mean to report an issue in good faith?

### Answer:

When you report an issue in good faith, it means that you believe the information you are reporting is accurate and truthful (even if that belief turns out to be mistaken). We protect employees who raise their concerns honestly. On the other hand, intentionally submitting a false or misleading report is a serious offense and a violation of this Code.





# One team

We work as a team, supporting each other and leaving a positive impact on the world.

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# We collaborate respectfully

**What can you do?** Collaboration and communication with intention and purpose are the very fabric of Rivian. We embrace vigorous debate, but we always treat each other with dignity and respect.

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. Everyone at Rivian is entitled to work in an environment that is free of harassment, bullying, discrimination and retaliation.

Promote fairness, diversity and inclusion. Each person is a key player on our team, deserving of respect. Demonstrate that you appreciate others' varied backgrounds, skills and cultures. Never single anyone out for negative treatment and be fair in all employment decisions. Base your decisions on factors like skills, qualifications, performance and business needs—never on personal characteristics, national origin, ethnicity, military status, or religious beliefs.

**Watch for harassment**

It takes many forms and can be verbal, physical, visual or sexual in nature. It might look like intimidation, bullying, racial slurs, overly flirtatious behavior or comments, sharing offensive material or making offensive or sexual jokes, or inappropriate touching, comments or requests.

**It happened. Now what do I do?**

If you see, experience or suspect harassment or discrimination, speak up about it. You can speak directly to the person or through your manager. Your People Partners or the Legal Team are also available to provide guidance. You may also make a report using the Rivian Ethics Hotline.

**Question:**

One of my coworkers emailed an inappropriate joke to me and some teammates. I find it offensive, but I don't know if I should approach my coworker with my concern. What should I do?

**Answer:**

We each have an obligation to ensure that Rivian is a great place to work for all, and offensive behavior such as this is not acceptable. You should advise your coworker that you found the email inappropriate. If you feel uncomfortable speaking with your coworker directly, contact your manager, the People Team or the Rivian Ethics Hotline.



# We communicate responsibly

## Overview

Everything we communicate about Rivian can have an impact on our reputation, coworkers and brand. We make sure the information we communicate is reliable, consistent and accurate, which is why only certain people are authorized to speak on Rivian's behalf.

It's easy for communications about Rivian to be misunderstood. That's why it is important that you refrain from speaking on Rivian's behalf unless you're authorized to do so. If you are ever contacted by the media about Rivian, refer them to the Rivian Communication Team. The same applies to requests for participation in speaking engagements or to publish articles. Rivian is required to comply with Regulation FD (which stands for "fair disclosure") under U.S. federal securities laws, which provides that, when we disclose material non-public information about the Company to securities market professionals or stockholders (where it is reasonably foreseeable that the stockholders will trade on the information), we must also disclose the information to the public. We have adopted separate Guidelines for Corporate Disclosure (the "Guidelines") to ensure the Company's compliance with Regulation FD. By following the Guidelines and our policies, we avoid sending confusing messages, sharing inaccurate information, or selectively disclosing market-sensitive financial data.

Nothing in our Code, the Guidelines or our policies is intended, or should be construed, to interfere with or limit your legal rights to speak publicly about matters of public concern and engage in concerted activities related to the terms and conditions of employment.

## Use social media wisely

Social media offers a great way to build relationships and exchange ideas. We respect your right to use social media, but always use it in a way that's consistent with our values and policies. Follow the law and Rivian's Social Media Policy. Be aware that you are solely responsible for what you publish, so use good judgment. If you identify yourself as a Rivian employee, or the subject of our Company comes up while you are on social media, make it clear in your postings that your views are your own—you are not speaking for Rivian. Never disclose confidential information about the Company, our customers, suppliers, competitors or other business partners, and never post anything that might constitute a threat, intimidation, harassment, discrimination or bullying.

## Seek approval prior to accepting a speaking or writing engagement

From time to time, you may be invited to speak publicly, write an article or contribute to a publication due to your role or experience at Rivian. If your speech, presentation, article or publication will discuss matters related to the Company, or if you are to be identified as an employee of Rivian, seek advance approval from your manager and the Rivian Communications Team regarding your proposed content. Accepting compensation or honorariums from our suppliers, customers and other business partners is prohibited.

## What if I already spoke on the company's behalf?

If you realize later that something you may have said or written could have been misinterpreted as speaking on behalf of the Company, contact your manager and the Rivian Communications Team so the Company can respond and minimize any misunderstanding.

# We participate in the political process

## What we believe

Rivian encourages employees to participate in the local, state and federal political process by giving their personal time. We will always encourage employees to vote. However, Rivian prohibits employees from making or authorizing political contributions to any government official or political campaign, whether in cash or in kind, by or on behalf of Rivian without prior written approval of the General Counsel or delegate.

These political participation activities are prohibited:

- Donations or contributions made to a political party or campaign on behalf of Rivian (either directly or indirectly).
- The loan of Rivian personnel to perform work for a political party or campaign on behalf of Rivian.
- The use of Rivian facilities, vehicles or equipment, office equipment, stationery or postage for a political campaign or political activities.
- The guarantee of debt for any political candidate, party or organization.

## Causes and candidates that are meaningful to you

Rivian encourages employees to contribute personal time and resources to political causes and nonprofit organizations. However, it's also important that any engagement in the political process stays separate from your work at Rivian. Employees may not participate in any activities that could be misinterpreted as a Rivian endorsement of a particular candidate (for example, appearing in an online, television or radio commercial for a candidate while representing oneself as a Rivian employee, or being quoted in a campaign brochure or newspaper article expressing support for the candidate while representing oneself as a Rivian employee). Further, employees may not wear a candidate's campaign button or T-shirt (or other political paraphernalia) or speak in support of a candidate at a Rivian-sponsored event, such as a facility tour or appearance.

## Did you know?

Rivian employees are prohibited from soliciting from or offering donations to other employees, suppliers, vendors, business partners or government officials for political fundraising.



# We provide a safe and healthy workplace

**What we believe** We believe accidents, incidents, injuries, near misses, work-related illnesses and unsafe conditions are often preventable. By prioritizing compliance with safety requirements related to planning and operations, we ensure our work environment meets applicable health and safety laws, regulations and requirements.

**For you, this means:**

- Take responsibility for your own safety and the safety of others around you. Correct or report hazards, and immediately address any unsafe behavior.
- Workplace violence or threatening behavior will not be tolerated. Under no circumstances may you bring a weapon to any Rivian office, parking lot, manufacturing location or other Rivian workspace.
- Know and follow all safety requirements, including, but not limited to, the use of personal protective equipment (PPE).
- Never take shortcuts or ignore required safety practices.
- If you are a manager, ensure employees are properly trained and equipped for each task. Hold employees accountable to our Code and all policies developed by our Environmental Health and Safety (EHS) Team.
- Do not use or possess illegal drugs at work. Do not work while intoxicated or under the influence of drugs or alcohol.

We ensure our work environment meets applicable health and safety laws, regulations and requirements.

## Question:

While walking through the plant, I saw an employee driving a forklift in what appeared to be a reckless manner. I work in the main office, and I have no responsibilities for the plant or its employees, so I didn't say anything. Now I'm wondering if I made the right call.

## Answer:

You should let someone know. Safety is everyone's responsibility. Reporting unsafe practices can help Rivian take preventive steps to avoid accidents. Your actions are important in protecting the safety of the workplace and your coworkers. Incidents like these should be reported to your manager and to EHS.





# Responsible conduct

Our mission is to enable adventure forever, and it is up to us to uphold that commitment

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# We maintain records accurately

## What we believe

Accurate recordkeeping and reporting is necessary to meet accounting, legal and regulatory requirements. Maintaining financial integrity is essential and reflects positively on our reputation and credibility. As a public company, Rivian is subject to various securities laws, regulations and reporting obligations. Both U.S. federal law and our policies require the disclosure of accurate and complete information regarding the Company's business, financial condition and results of operations, and inaccurate, incomplete or untimely reporting can severely damage the Company and result in legal liability. Each of us—at every level—has a responsibility for ensuring the accuracy of all Company business and financial records.

## How we live it

From quality assurance records, budget forecasts and regulatory filings, to emails, timesheets, benefit claim forms and expense reports, we all handle Company records. Be sure to follow all internal processes, record retention requirements, policies and generally accepted accounting principles so that our records accurately reflect all transactions. Be honest, accurate, timely and complete in everything you record.

The Company's principal financial officers and other employees working in the Finance Team have a special responsibility to ensure that all our financial disclosures are full, fair, accurate, timely and understandable. These employees must understand and strictly comply with generally accepted accounting principles and all standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts.

As a public company, Rivian is subject to various securities laws, regulations and reporting obligations.

## What else can you do?

### Properly classify transactions

Never distort the true nature of any transaction. Make sure you always record and classify transactions in the proper accounting period and in the appropriate account and department. Remember that even if you are not the person recording the financial entry, the data you provide in non-financial systems and records drive the Company's classification of the accounting transaction. Never speed up, slow down or alter the recording of revenue or expenses in order to meet a budgetary goal or approval threshold.

### Maintain our high standards

We do not falsify or mischaracterize any record, account or transaction. We cannot establish any undisclosed, unrecorded or off-the-record accounts for any purpose. If you submit expenses for reimbursement or make payments on behalf of the Company, include all supporting documentation and any approvals that may be required. Estimates and accruals must also be supported by appropriate documentation and based on your best professional judgment.

### Be honest with regulators

If your job requires that you disclose information to the government or regulatory authorities, make sure the information you provide is full, fair, accurate, timely and understandable. Be sure to collaborate with the Legal Team and the Finance Team before final submission of relevant information.

### Manage records properly

Know and follow the policies that relate to record retention, including maintenance, storage and disposal of records. Never destroy or dispose of information that might be needed for an investigation, an audit or a legal proceeding. If you receive a Legal Hold Notice, follow the guidelines in the notification. If you are not sure about what is required, check with the Legal Team or the Ethics and Compliance Team and check our Record Retention Policy.

## We maintain records accurately



### Question:

We placed an order with a supplier for services that are received over a period of time. To be more efficient, is it okay to record the goods receipt at the same time I approve the invoice, even though there is a time gap between when services are received and when we receive the invoice?

### Answer:

No. The business relies on timely goods receipts to accurately represent our commitments to our vendors in our financial statements and to ensure we do not pay invoices for goods and services in excess of what we receive. This action would constitute a violation of our Code.

# We avoid conflicts of interest

- What we believe** We are all expected to act in Rivian's best interest, not in our personal interest. This means we must never allow our personal interests to influence our actions on decisions on behalf of the Company. Every decision we make should be focused on Rivian's business interests and reputation.
- How we live it** Before you act on Rivian's behalf, you need to be able to recognize and avoid potential conflicts of interest. A conflict happens when you allow personal interests to interfere with the business decisions you make. Even the appearance of a conflict is problematic and can damage our hard-earned reputation.
- Outside employment** Having a second job is permitted if it does not interfere with your ability to do your job with the Company and does not create a conflict of interest (or the appearance of one). Any outside employment must comply with Rivian's policies and procedures (including this Code). If you are unsure about your outside employment, seek guidance from the Ethics and Compliance Team.
- Corporate opportunities and self-dealing** You may not use Rivian's property, confidential information or your position at Rivian for improper personal gain, nor may you compete with Rivian, including taking opportunities for yourself that are meant or intended for Rivian. This is known as "self-dealing."
- Consulting** Whenever you are asked to provide your expertise and insights to a third party, and the expertise you are being asked to supply is directly related to your role and responsibilities at Rivian, this could give rise to a conflict of interest. If you are unsure, disclose the opportunity and seek guidance from Ethics and Compliance before responding.

**We are all expected to act in Rivian's best interest, not in our personal interest.**

**Outside speeches, presentations or publications** You may be asked to speak at conferences, make presentations or contribute to publications (written or online) because you are a Rivian employee, or because of your professional or industry expertise. A conflict could arise if you are offered compensation, hotel stays, or reimbursement of expenses you may incur. Seek guidance from both the Ethics and Compliance Team and the Communications Team anytime you are asked to speak, write or publish on behalf of the company.

**Disclosure** Rivian requires that employees, leaders and members of the Board of Directors disclose any situation that reasonably would be expected to give rise to a conflict of interest. If you suspect that you have a situation that could be a potential conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must report it in writing to your manager and the Ethics and Compliance Team. If you are a member of the Board of Directors, an executive officer or a principal financial officer, all potential conflicts of interest must be disclosed to the Board of Directors. The Company's Ethics and Compliance Team or the Board of Directors, as applicable, will work with you to determine whether you have a conflict of interest and, if so, how best to address it. All transactions that could give rise to a conflict of interest involving a member of the Board of Directors, executive officer or principal financial officer must be reviewed and approved by the Audit Committee of the Board of Directors, and any such approval will not be considered a waiver of this Code.

**Material customer or supplier** For purposes of this Code, a company is a material customer if the customer has made payments to Rivian in the past year in excess of \$200,000 or 5% of Rivian's gross revenues, whichever is greater. A company is a material supplier if the supplier has received payments from Rivian in the past year in excess of \$200,000 or 5% of the supplier's gross revenues, whichever is greater. If you are uncertain whether a particular company is a material customer or supplier, please contact the Ethics and Compliance Team for assistance.



## We avoid conflicts of interest



### Examples of situations that could give rise to actual or potential conflicts of interest

1. Outside employment with a company that you know or suspect is a material Rivian customer, supplier, competitor, vendor, or service provider
2. Outside consulting or serving as a paid expert directly related to your role and responsibilities at Rivian
3. Self-dealing—this includes taking opportunities for yourself that would otherwise be beneficial for Rivian
4. Having a material interest (ownership or otherwise) in any company that you know or suspect is a material Rivian customer, supplier; or competitor (whether something is a material interest will be determined by the Company in light of all of the circumstances, including consideration of the relationship of the employee to the customer, supplier or competitor; the relationship of the employee to the specific transaction, and the importance of the interest to the employee having the interest)
5. Obtaining loans or guarantees of personal obligations from, or entering into any other personal financial transaction with, any company that you know or suspect is a material Rivian customer, supplier or competitor (arms-length transactions with banks, brokerage firms or other financial institutions are not prohibited)
6. Serving on a board of directors or trustees or on a committee of any entity whose interests reasonably would be expected to conflict with those of Rivian
7. The actions of family members outside the workplace may also give rise to the conflicts of interest described above because they may influence an employee's or director's objectivity in making decisions on behalf of Rivian. For purposes of this Code, "family members" include your spouse or life-partner, brothers, sisters, parents, in-laws and children, whether such relationships are by blood or adoption.
8. Non-disclosure of an existing conflict of interest to Rivian upon hire (or any later date while employed)

# We follow guidelines for gifts, meals and entertainment

## What we believe

At Rivian, we believe good business relationships are forged through trust and business integrity, not the exchange of business courtesies such as gifts, meals, entertainment or other favors. We value the relationships we have built with our suppliers, customers and other business partners. They are based on trust and transparency. It is important that these relationships remain positive and ethical, never influenced by the giving or receiving of inappropriate gifts, lavish meals and hospitality, or VIP access to events. In addition, the giving and receiving of gifts are subject to a variety of laws, rules and regulations applicable to Rivian's operations. These include laws covering the marketing of products, bribery, corruption and kickbacks. You are expected to understand and comply with all laws, rules and regulations that apply to your job position.

## How we live it

No gift, meal or offer of entertainment, or any other business courtesy, should impose or appear to impose a sense of obligation on either the giver or the recipient, nor create the perception that either party's business judgment could be unduly influenced.

The exchange of modest gifts and the sharing of meals and entertainment is nothing new in business. It is often a traditional way to express gratitude and enhance or build relationships. However, an overly generous gift, meal or entertainment can pressure the recipient to return the favor or feel indebted to the giver. This can result in business decisions that benefit one party more than the other or cause undue influence around a critical business transaction.

## What else can you do?

Our approach is simple: we do not give or accept gifts, meals or entertainment that may look like an attempt to improperly influence a business decision. It is best to politely decline any gift or business courtesy from current or potential suppliers, customers, vendors or other business partners if it would create the appearance of a conflict or poor judgment.

### Examples of acceptable gifts and meals

- offer to attend a working group lunch
- small, branded mementos, such as T-shirts, mugs, hats, water bottles
- customary seasonal gifts, such as holiday gift baskets sent to an entire department or group, intended to be shared

### Examples of prohibited gifts, meals and entertainment

- gift cards or cash equivalents
- airfare and/or accommodations at a luxury resort
- tickets or VIP passes to an exclusive or sold-out event
- lavish or extravagant meals
- high-value gifts such as electronic digital equipment, fitness trackers or portable WiFi.

You should make every effort to refuse or return a gift that is beyond these permissible guidelines. If it would be inappropriate to refuse a gift, or you are unable to return a gift, you should promptly report the gift to your manager and the Ethics and Compliance Team. You may be required to donate the gift to an appropriate community nonprofit organization. If you have any questions about whether it is permissible to accept a gift or something else of value, contact your manager and/or the Ethics and Compliance Team for additional guidance.

# We build transparent relationships

**What we believe** Our suppliers, customers and other business partners place a great deal of trust in our brand, and we are determined to never let them down. We see them as true partners, and they are essential to Rivian's continued growth and success.

**How we live it** Building relationships with suppliers, customers and other business partners is an ongoing process and requires an enduring commitment to high standards of business conduct. In every interaction we have with these third parties, we must demonstrate honesty and a commitment to our values. Just one deceptive or dishonest act can seriously damage a relationship.

Make sure you understand your responsibilities and always deal fairly with our suppliers, customers and business partners. Integrity is not a unilateral obligation—it is a responsibility we all share. If you are responsible for a supplier and/or other business partner relationship, help us ensure that we are doing business only with suppliers and other business partners who share our commitment to doing what is right.



## What else can you do?

**Speak the truth** Everything we tell our customers, suppliers and other business partners must be truthful, including our advertising and other communications. Do not engage in any unfair, deceptive or misleading practices.

**Treat partners fairly** Be fair and honest in your interactions with customers, suppliers and other business partners. Avoid anything that even looks like a possible conflict of interest, and do not offer or provide anything to these business partners in exchange for an advantage for the Company.

**Ensure accountability** If you work with any supplier or other business partner, make sure they know about our Supplier Code of Conduct and any other related policies. Hold them accountable.

**Choose suppliers and vendors ethically** If you are involved in selecting suppliers or vendors for the Company, make sure you choose objectively; select them based on price, quality and the products or services they offer. Follow the Rivian Global Purchasing Policy.

**Working with the government** If your work involves government or regulator interactions or compliance with government/regulator inspections, investigations or requests for information, cooperate fully; make sure you understand the rules and regulations that apply to Rivian, and that any information submitted on behalf of the Company is accurate. Similarly, if your work involves sales to the government, make sure you know and follow all the procurement, sourcing, due diligence and other requirements that relate to government contracts. Seek frequent legal counsel from the Legal Team along the way.



# Respect

We respect the laws governing our business, and our conduct reflects compliance and integrity.

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| We compete fairly                        | 21 |
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| We do not tolerate bribery or corruption | 24 |
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# We compete fairly

**What we believe** We compete fairly. We know that everyone benefits from a competitive marketplace, so we follow antitrust and fair competition laws in all locations where we do business and avoid even the appearance of unfairly restricting another company's ability to compete against us.

**How we live it** We build market segment share and brand loyalty by delivering quality products and services, not by engaging in unfair or anti-competitive practices. Some agreements with customers, suppliers, competitors or other business partners have the potential to limit free and open competition, so if you are responsible for areas of our business where antitrust or fair competition laws apply, make sure you know how they apply in the country (or countries) where you work and operate.



**What else can you do?** Never enter into any agreement or understanding—even an informal understanding—with a competitor to:

- Set prices on our products and services
- Divide territories, markets or customers
- Prevent another company from entering the market
- Participate in any form of bid rigging
- Refuse to deal with a customer or supplier for improper reasons
- Boycott another company or any country

**Be careful at conferences and trade shows** Do not discuss or exchange information with competitors (or potential competitors) about topics such as pricing, costs, terms or conditions of sale, market segments, clients or marketing strategies. If a discussion turns to a competitively sensitive subject, stop the conversation, remove yourself from the situation and immediately report the incident to the Legal Team.

**Gather competitive intelligence ethically and lawfully** Obtaining information about our competitors (often called “competitive intelligence”) is a normal business practice and necessary to remain an effective competitor. However, make sure you gather information properly. Use public or other allowable sources, and be honest about who you are and whom you work for. Do not gather or ask someone else to gather competitive information using techniques that are not transparent.

**Tell the truth about our products** Deal honestly and fairly with our customers. Be truthful about Rivian and what we sell. Do not make any claims the Company cannot support or substantiate, and do not make inaccurate remarks about our competitors or erroneous comparisons between their products and ours.

# We comply with trade compliance laws



## What we believe

As our vehicles contain material and technologies sourced from around the world, we are careful to comply with the laws and regulations that govern international trade. We are obligated to know, understand and comply with the requirements that apply to the movement of our products, services and technologies.

## How we live it

In order to put our products, services and technology into the hands of consumers everywhere, we follow all applicable import and export laws and regulations associated with the countries where we operate.

## Trade sanctions and embargoes

**We do not conduct unauthorized business with countries or third parties that are subject to trade embargoes or economic sanctions, including those published by the U.S. Office of Foreign Assets Control (OFAC). As a United States-headquartered company, we cannot participate in boycotts that the United States federal government does not support. We do not do business with Specially Designated Nationals or any country sanctioned by OFAC.**

## What else can you do?

Follow the rules. If you are responsible for, or involved with, the movement of Company goods (including parts, finished product, promotional or marketing items and equipment), people, services, technology, money, or information across international borders (or involving citizens of a foreign country), make sure you know and comply with the trade laws and regulations of the countries in which you do business. Be aware that the laws of more than one country may apply.

Know the end-use and the end-user of our transactions, and be aware of applicable programs to reduce duties and tariffs. If you have any questions or concerns regarding trade compliance, consult the Global Trade Compliance Policy or reach out to the Trade Compliance Team.

## We comply with trade compliance laws

### Question:

To avoid paying customs duties in its country, an international customer has asked that I sign an origin declaration or certificate of origin identifying that the Company's products originate in Mexico. I know that some finishing work occurred in Mexico but am not aware of the manufacturing process. Can I sign the declaration/certificate of origin?

### Answer:

Only with prior approval from Rivian's Trade Compliance Team. Origin declarations and certificates of origin are governed by local and international laws and require a detailed analysis of the manufacturing process under an established set of rules. An incorrect statement may result in false declarations to the customs authorities and subject the Company to significant fines and penalties, even when we are not the importer or exporter.

### Question:

I am part of the Sourcing Team and have been asked to purchase material from a supplier located in a sanctioned jurisdiction. The supplier's owner is designated as a "Blocked Person" and appears on the U.S. government's Specially Designated Nationals list. Is it okay for me to purchase the material we need from the supplier? If not, can I have an independent third-party source this item on the Company's behalf?

### Answer:

No. Our Global Trade Compliance Policy and relevant laws make clear that all "U.S. Persons" must comply with applicable trade sanctions and regulations. The definition of a U.S. Person generally includes Rivian and its employees and agents, regardless of where they are located. Additionally, it would be a violation of our Code and the law to authorize a third party to make this purchase on our behalf.



# We do not tolerate bribery or corruption

## What we believe

At Rivian, our approach to doing business is ethical, open and honest. Our success is based on the quality of our products and services, never on unethical or questionable behavior. We do not tolerate acts of bribery or corruption. This means we do not offer or accept bribes or condone corruption anywhere that we operate or wherever our vehicles are sold. The bottom line is that we never offer or accept anything of value in order to get business, keep business or gain an unfair advantage.

## How we live it

### We do NOT:

- **Authorize, pay, promise or offer to give anything to a government official or a private individual to improperly influence that individual to act in our favor.**
- **Request or authorize any third party to make such payments, promises or offers on our behalf.**
- **Accept bribes from government officials or private individuals under any circumstances.**

The consequences of violating bribery laws can be severe for you personally, and for Rivian. Failure to comply with our Anti-Bribery and Anti-Corruption Policy may result in disciplinary action. You also run the risk of being fined or going to jail.

As we drive to be successful in our business, there may be instances where you are asked to give or accept something of value. Follow anti-bribery and anti-corruption laws wherever we do business, and, regardless of what local laws may permit, never offer, pay, promise to pay or accept anything of value, either directly or indirectly, to improperly influence the judgment or actions of others.

## What else can you do?

### Learn to spot a bribe

Bribes come in many forms, and they are not always obvious. A gift, the promise of a job, the offer of a trip, a charitable contribution—all could be considered bribes if offered in exchange for any business decision, action or favorable treatment.

### Ask first and obtain necessary approvals

**Before you offer or accept anything of value involving a government official (even a meal or coffee), ask for help from the Ethics and Compliance Team or the Legal Team if you are not sure what to do.**

### Document

Be certain to fully and accurately record and document any payment, meal, event or expense incurred by Rivian using our accounting system, which may include submitting a detailed expense report.

### Do not make facilitation payments

A facilitation (or “grease”) payment is a small payment made to a government official to speed up routine government actions, like processing paperwork, issuing permits, rushing inspections, installing phones or turning on the power. Regardless of the amount or custom in a particular country, we never make facilitation payments.



# We do not tolerate bribery or corruption



## Did you know?

In the context of our interactions with government officials, charitable and political donations can give rise to increased risk of bribery and corruption because they could be construed as bribes. Rivian employees are prohibited from soliciting or offering donations to favored charities or political parties associated with our suppliers, vendors or government officials with whom we interact.

## What about third parties and agents?

As a company, we are responsible not only for the actions of our employees, but also for the actions of anyone who represents us. These entities or people are sometimes referred to as “third parties” or “agents.” If you are responsible for hiring third parties or agents who will work on our behalf, follow our due diligence process so that we fully understand, well in advance, whom we select to represent us. If you are responsible for managing third parties, monitor their work and report to the Ethics and Compliance Team anytime you see or suspect unusual activity.

Anything of value offered or given to a government official requires prior written approval from the Ethics and Compliance Team or the Legal Team and must be recorded in detail in Rivian’s books and records, including employee expense reports, as applicable.

**As a company, we are responsible not only for the actions of our employees, but also for the actions of anyone who represents us.**

# We are focused on financial compliance

## What we believe

One of our most important responsibilities to our investors, shareholders and regulators is to make sure that all Rivian financial transactions are fully and accurately recorded in the company's books and records. This obligation is one we take seriously as a legal and ethical matter. No one should make false or misleading entries, nor receive unrecorded funds, assets or payments without appropriate supporting documentation and approval.

## How we live it

**We maintain all our books, records, accounts and financial statements in appropriate detail, so they accurately reflect the company's financial transactions. These documents must strictly conform to local tax and accounting requirements and practices, applicable legal requirements and our internal and external disclosure controls.**

## What else can you do?

### Be diligent

Take the time to know our suppliers, customers and other business partners. **Perform appropriate screenings and conduct due diligence, including understanding who the beneficial owners may be, and which banks they routinely use.**

### Be alert

Be proactive when it comes to spotting financial transactions that might signal a problem, and report your concern if you see or suspect an activity or transaction that is outside of an approved process. Financial red flags may include a request to:

- Transfer payment to or from entities or countries not related to the transaction;
- Process a transaction in a way that circumvents the normal process;
- Make or receive payments in cash;
- Change banking or account information;
- Process an invoice payment received through an unknown or unfamiliar entity.

Report any unusual activity to your manager, the Finance Team or the Legal Team.



# Insider trading

## What we believe

Through your work, you may have access to material, non-public information about Rivian's customers, competitors, suppliers or other third parties. Further, you may have access to information about Rivian's financial and business performance, potentially significant business deals, manufacturing timelines, changes in executive leadership or new products and projects that have not been released to the public. This may include information that an investor would, or would likely, consider important in evaluating shares of stock, bonds or other securities. This information is considered "inside" information.

Trading securities on the basis of inside information or providing inside information to any party who may use the information to trade may be a serious violation of U.S. securities laws and the laws of other countries. This is true regardless of where in the world you live, or the size of the transaction.

## Did you know?

It can raise significant legal issues if you have access to material, non-public information on Rivian or our suppliers, and you buy or sell Rivian's or their securities.

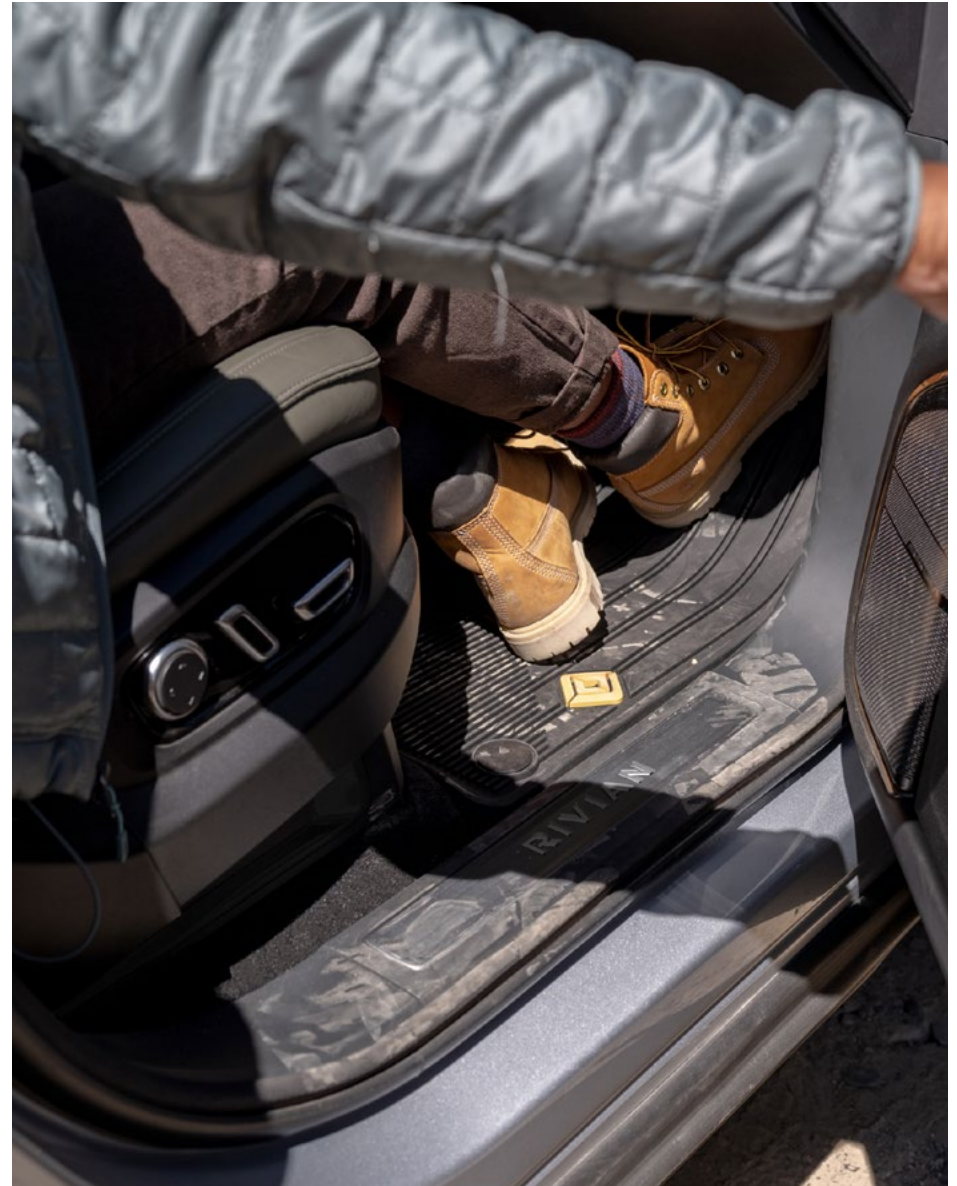
## How we live it

If you have access to inside information, never trade on it or share it with others until after it's been released to the public. Passing inside information along to anyone who may use it in a decision to invest, including family, friends or other third parties, is also a form of insider trading known as "tipping."

In sum, trading Rivian, customer, competitor or third-party securities while in possession of inside information is considered insider trading and is illegal.

- Exercise caution and seek guidance from the Legal Team if you are unsure. Do not volunteer inside information to anyone who makes inquiries, and do not provide this information to your family or friends. Avoid even the appearance of anything improper.

If you have any questions regarding what is inside information, contact the Legal Team. For more information, refer to our Insider Trading Compliance Policy.





# Protect

Systems within our company and our vehicles must be secure, and all personal data must be protected.

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# We safeguard and respect intellectual property

Never post Rivian confidential information on social media.



## What we believe

Rivian is committed to protecting its own intellectual property, such as inventions, patents, copyrights, know-how, trade secrets, trade dress, trademarks and any non-public information about our processes, products, innovation, operations, and financial and strategic plans. The Company's intellectual property is at our disposal because of significant investments. If our intellectual property and confidential information is not protected, it becomes available to others who have not made similar investments. This will cause us to lose our competitive advantage and compromise our ability to provide unique products and services to our customers. It is the responsibility of every employee to safeguard Rivian's intellectual property and report any misuse.

## For you, this means:

- Do not download information from a subscription database without permission.
- Employees who create new developments must always report those developments to an IP Engineer for evaluation and protection before disclosure to anyone outside Rivian unless written authorization has been obtained from the Intellectual Property Team.
- Make sure you have executed a non-disclosure agreement or other documents that include confidential provisions and have a proper business purpose before accepting third-party confidential information or disclosing Rivian confidential information to anyone outside the Company.
- Never post Rivian confidential information on social media.
- Do not discuss confidential information in public places or leave confidential material unattended, even in the office.
- Remember that your obligation to protect Rivian's intellectual property, including confidential information, will continue after you have left the Company.
- Report any suspected or alleged unpermitted use of Rivian's intellectual property.

# We safeguard and respect intellectual property

## What we believe regarding intellectual property and confidential information of others

Rivian is also committed to respecting the intellectual property and confidential information that belong to others. Infringement of third-party intellectual property rights can significantly hurt our business. Similarly, theft, unauthorized use or disclosure of third-party proprietary, confidential or trade secret information could result in substantial civil and criminal penalties against you and the Company. This includes any non-public information about a third party's processes, products, innovations, operations, engineering specifications, software, and financial or strategic plans.

At Rivian, you are expected not to use or disclose any proprietary and confidential information or materials, including trade secrets, of any former employer or other third party to whom you have an obligation of confidentiality, and not to violate any lawful agreement that you may have with any third party. Rivian does not want or need your former employer's proprietary, confidential or trade secret information, and you are not to use or share such information while employed by Rivian or in connection with any work you may do on Rivian's behalf. When you signed your onboarding documentation, you acknowledged that you would abide by these principles as you joined Rivian.

## Reminders

- Protect the confidential information that suppliers, business partners and others share with us.
- Any Rivian employee having a prior personal commitment with respect to the intellectual property of a former employer will honor those obligations in the course of their employment with Rivian. Similarly, it is the responsibility of the employee to understand and abide by their ongoing obligations to Rivian should their employment with Rivian terminate for any reason.
- Never disclose or bring any of your former employer's proprietary, confidential or trade secret information onto Rivian's premises or introduce it into Rivian's IT systems, including your Rivian laptop or phone.
- Respect and do not use intellectual property that belongs to others without prior internal approval and permission from the third party.
- Report any suspected or alleged unpermitted use of any third party's intellectual property and confidential information.



# We protect what is ours

## Overview

Rivian provides its employees with a variety of tools and assets to help you perform your work. These assets include computer equipment, mobile devices, communications platforms and equipment, software, office and electronic equipment, and facilities. Rivian employees are expected to use Rivian assets for legitimate company business and appropriately safeguard them, including against cyber-related attack, theft, loss, waste or abuse, all in accordance with our Acceptable Use Policy.

Use your judgment in using Company assets for personal matters. These assets are property of Rivian and provided for business use. While we recognize that personal use occurs, it should not be excessive and should not interfere with the performance of your job duties or violate any Rivian policies or procedures. Furthermore, in most jurisdictions, you should have no expectation of privacy when using Company assets or IT resources.

Recognize that theft, carelessness and waste have a direct impact on Rivian's bottom line. Any suspected incident of fraud, theft or misuse should be immediately reported to the Rivian Ethics Hotline, Ethics and Compliance Team or the Legal Team.



## What you can do:

- Spend Rivian's funds wisely, and guard against waste and abuse.
- Protect Company laptops and other mobile devices from theft or loss.
- Use strong passwords, and do not share any passwords to any system or application.
- Exercise good judgment when using Rivian-provided technology resources, and ensure that any personal use does not interfere with your job responsibilities or harm our work environment.
- Politely challenge strangers present inside Rivian's facilities without appropriate identification, and notify building security if you question their credentials or presence on the premises.
- Securely store any removable media, including flash drives, CDs and external drives.
- When working with Rivian information, use only approved Company equipment, software and services.
- Use your Rivian email account for all work-related communications—never use personal email accounts to conduct company business.

### Question:

I noticed my coworker leaving her Rivian laptop on the front seat of her car in a public parking lot. Should I say anything?

### Answer:

Yes! Leaving a laptop in plain sight inside a vehicle invites theft. Remind your coworker that her laptop should either be kept with her or securely stored in her home or at a hotel if she's traveling.

# We follow privacy laws

**What we believe** The basis of any good relationship is trust. When our customers do business with us, they entrust us with their personal information and/or third parties' personal information. Our employees do the same when they join the Company. We take our obligations to our customers and employees seriously, and collect, use and process any personal information only for legitimate business purposes, and protect it from possible loss, misuse or disclosure.

**How we live it** Keeping personal information secure is critical to our people, our business and our reputation. We recognize this responsibility and follow the laws and rules that require us to protect any personal information that can identify an individual or that relates to an identifiable individual, also known as Personally Identifiable Information (PII). PII can be considered especially sensitive, requiring us to add an extra level of protection and maintain a higher duty of care based on applicable law.

Many Rivian employees work with PII (including sensitive personal information) as a part of their jobs. If you are one of them, guard this information well by following the Company's policies, including, but not limited to, the Rivian Data Classification Policy regarding the access, transfer and use of this information.

**Keeping personal information secure is critical to our people, our business and our reputation.**

**PII includes information about anyone, such as:**

- Email address (including business email)
- Telephone numbers
- Employee ID number
- IP addresses
- Credit card information
- Customer records
- Characteristics of protected classes
- Biometric data
- Date of birth (DOB)
- U. S. Social Security Number
- Geolocation data
- Employment information
- Audio/Video, visual, thermal or similar recordings
- Education records
- Inferences made from these categories
- Personal financial information
- Medical information or history
- Names of family members
- Name and government identification number(s)
- A combination of certain information, such as consumer habits and demographics

If you are not sure whether you are handling any PII or whether your use is in accordance with Company policies and procedures, ask your manager or contact the Privacy Team.

Do not access personal information stored on our systems unless you have a legitimate need to do so in the performance of your job function. Access only the minimum amount of information necessary to complete the current task you are undertaking in the scope of your role. Let your manager know if you have access to personal information about individuals that you don't need.



# We follow privacy laws

## What else can you do?

If you have to use it, use it with care

Collect PII only for legitimate business reasons, and share it only on a need-to-know basis with authorized people who also need the information for completing their work. Never share PII with any unauthorized person or vendor. Never share PII with anyone in the Company who does not require the use of such information to complete their job.

## Protect PII

You would never want your PII to be disclosed. The same goes for your coworkers. At a minimum, secure their PII as you would your own, protecting it from deliberate or accidental exposure. Whether you work with this information or come across it inadvertently, do all you can to handle it properly, uphold data privacy and protection laws wherever we work, and report any unauthorized use, leak or loss of PII as soon as you become aware.

We have a Privacy Policy to govern our Company-wide use of PII. Additionally, we comply with our legal obligations to protect PII from unauthorized disclosure to ensure the integrity and security of PII. Immediately report any unauthorized use, leak or loss of PII promptly to the Cybersecurity Team.

### Question:

Somebody accidentally emailed me a People Partners report that includes the names and protected personal information of several Rivian employees. Should I just delete the file and forget that I saw it?

### Answer:

If it was accessed by you, it could be accessed by others without proper authorization or the need to know. Not only should you delete the file, you should contact the Cybersecurity Team to ensure the appropriate protections are in place.





# Commitment

We care for the world and our communities.

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# We respect human rights

**What we believe** We respect the human rights and dignity of people throughout our operations and our global supply chain. We comply, and expect our suppliers to comply, with:

- Laws that promote safe working conditions and individual security.
- Laws prohibiting forced labor.
- Prohibitions on human trafficking and the employment of underage children.
- Laws that ensure freedom of association and the right to engage in collective bargaining.

**Holding third parties accountable**

We are careful to select third parties who are committed to treating all workers with dignity and respect. If your work involves selecting or managing third parties, practice advance due diligence. Make sure they know about our Supplier Code of Conduct and the law, and that they honor and respect fundamental human rights.

**Be vigilant**

Hold suppliers and others with whom we do business accountable, and routinely monitor their activities. If you note anything unusual, alert the Ethics and Compliance Team, the Legal Team, or submit a report via the Rivian Ethics Hotline. We will review and respond appropriately when we become aware of potential violations, up to and including termination of the supplier's contract. You have an obligation to speak up if you suspect a violation of human rights in our supply chain.

**We respect the human rights and dignity of people throughout our operations and our global supply chain.**

**Question:**

I read an article that the supplier my coworker is considering for an upcoming project has been known to purchase raw materials from a company that engages in forced labor. I'm not involved in the decision, so is it my place to say anything?

**Answer:**

Yes, absolutely. Selecting a business partner that has a reputation for engaging in forced labor or any sort of human rights abuse is against Rivian's values. You should tell your coworker and another appropriate internal resource what you know about the contractor to help inform Rivian's decision.



# Our commitment to the environment



## Overview

We believe there is a more responsible way to explore the world and are determined to make the transition to sustainable transportation an exciting one. This is why we ensure our business operations are in compliance with applicable environmental protection legislation as well as applicable internal requirements.

We've designed our battery pack, module and battery management system to seamlessly transition from vehicle energy storage to stationary energy storage at the end of their vehicle life. We believe that second-life batteries are a big enabler to accelerating widespread adoption of renewable energy.

## Did you know?

We have a collaboration with the Honnold Foundation to support energy independence and adoption of renewable power generation in the town of Adjuntas, Puerto Rico.

## For you, this means:

- Follow the environmental laws and Company requirements that apply to your job.
- Take all required precautions when handling or transporting hazardous materials, dangerous parts or waste, including during loading, unloading or storage. If you are not familiar with these requirements, ask your manager or EHS for direction.
- Use and dispose of chemicals and other materials properly, and report any spillage, discharge or environmental concerns.
- If you become aware of any air or water pollution at any of our sites, including during the course of routine manufacturing, immediately alert the EHS Team.
- What are hazardous materials or dangerous parts? For purposes of this Code, we mean any chemicals, materials or waste that could present health risks or are corrosive, flammable or explosive. This includes batteries, airbags, aerosols, gasoline and diesel, and also certain paints, solvents, adhesives or surface treatments.

# The journey never ends

## Waivers of the code

Rivian's Board of Directors or a delegated Board committee must approve any waiver of any part of this Code for the Executive Team, other principal financial officers or any member of the Board of Directors. Waivers of this Code for other employees may be made only by our Chief Executive Officer or General Counsel and will be reported to our Audit Committee. All waivers must be documented and promptly disclosed to the public as required by law or according to the rules of The Nasdaq Stock Market LLC, when applicable.



Rivian's legacy will be determined by our hard work and commitment to doing the right thing every day, for every business transaction. While our Code cannot encompass all our important Company policies and expectations, there are standards and values that sit at the core of who we are as an organization—principles that fundamentally respect people and environments around the world.

Remain inspired, and work each day in a way that inspires others.

We look beyond ourselves, setting our sights on being good stewards, making a positive impact and building a better world. Remember that as employees, we represent Rivian to the world. You can help demonstrate our good corporate citizenship by upholding our standards, being aware of your own actions and decisions, and recognizing how they might affect others.

Follow our Code, our policies, and the laws and regulations that apply to your work. When something doesn't feel right or puts our Company, our people or those we serve at risk, please speak up and report your concerns. When you do, you preserve our good name and reputation and help us to better navigate the Rivian journey for generations to come.

Thank you for your ongoing commitment to our Code.

**RIVIAN Ethics Hotline**  
**1-844-986-1441**  
[www.rivian.ethicspoint.com](http://www.rivian.ethicspoint.com)

This Code, as applied to the Company's principal financial officers, shall be our "code of ethics" within the meaning of Section 406 of the Sarbanes-Oxley Act of 2002 and the rules promulgated thereunder.

This Code and the matters contained herein are neither a contract of employment nor a guarantee of continuing Company policy. The Company reserves the right to amend, supplement or discontinue this Code and the matters addressed herein, without prior notice, at any time.

