

CODE OF BUSINESS CONDUCT AND ETHICS

(Effective as of March 24, 2021)

About the Arrival Code of Business Conduct and Ethics

The Arrival Code of Business Conduct and Ethics (“the Code”) sets out the fundamental principles of ethical decision making and responsible business conduct at Arrival. Whilst the Code is specifically written for Arrival employees, directors and board members, we expect all Arrival contractors, consultants, and others who may be temporarily assigned to perform work or services for Arrival to follow the Code in connection with their work for us. Failure to do so can result in termination of their relationship with Arrival.

We expect all of our employees, directors and board members to know, understand and follow the Code, its related guidelines and referenced policies. Failure to do so can result in disciplinary action, including termination of employment. The Code does not cover every issue and eventuality that may arise and represents the minimum baseline of acceptable business conduct and ethics at Arrival. If more specific guidelines or central directives exist for the issues addressed in this Code of Business Conduct, they must be observed. If there is a conflict between the law and any area of the Code, the law will prevail.

For the purposes of this Code, Arrival includes Arrival Limited and all other companies within the Arrival corporate group. If you have any questions about the contents of this Code, please reach out to our Compliance Team.

Implementation of the Code and Raising Concerns

This Code captures the ethical standards for Arrival employees, directors, board members and business partners. The Code is supplemented by more detailed policies and guidelines, some of which are referred to in this Code. It is the responsibility of all employees to access supplementary guidance, instructions and standards via the company Intranet and Arrival Wiki as necessary. Arrival commits to providing training and information to its employees and to performing ongoing dialogue with its external business partners in order to ensure awareness of this Code.

The Ethics committee is responsible for administering the Code in an independent, objective and consistent manner. The Committee is made up of a group of senior Company leaders who enforce the Code, and it is overseen by our Chief Financial Officer, General Counsel and the Audit Committee of the Board of Directors.

Acts in violation of this Code may cause significant long-term damage to Arrival’s reputation and may lead to legal action against the company. All Arrival members are obligated to diligently report any compliance concerns or potential or suspected violations of this Code to their supervisor, the General Counsel or the Compliance Team.

In all instances, the rights and privacy of both the reporting person(s) and the one(s) accused of violations are adequately protected and assured. Arrival will not tolerate any adverse employment action or retaliation against a person who raises a compliance concern. Any person who retaliates against another for raising a compliance concern in good faith will be subject to strict discipline, up to and including termination of employment.

Where permitted by the law, reports can be made anonymously over the phone or online through a third-party service that we have partnered with (Navex Global), or you can choose whichever reporting option you are most comfortable using. Whichever option you choose, your confidentiality will be protected.

Email: conduct@arrival.com

By Post: Beaumont House, Kensington Village, Hammersmith, London W14 8T

Navex Global Information:

Web Intake Site: arrival.ethicspoint.com

Mobile Intake Site: arrivalmobile.ethicspoint.com

Hotline: From an outside line dial the direct access number for your location: 0-800-89-0011 and at the English prompt dial 833 679 2183.

Modifications and Waivers

Despite our effort to be regularly informed about the circumstances that may affect the topics of this Code, we realize that it cannot cover every possible event or issue that could arise. On this basis we may need to modify The Code and the included standards and policies as necessary. Any waivers of the Code, however, must be approved by the Board of Directors or the Board's designees. In the extremely rare situation that a waiver is approved, we will quickly and properly disclose it where required by law.

Note: The rules contained in this Code of Business Conduct apply to the employment contracts between the respective Arrival Group companies and their associates. They are mandatory directives. Third parties may not derive any rights from this Code of Business Conduct.

How to use the Arrival Code of Business Conduct and Ethics

The Arrival Code of Business Conduct and Ethics enables its users to:

- Perform on their job role honestly and ethically
- Uphold Arrival values and protect its reputation
- Understand what Arrival expects from its employees
- Make ethical and objective decisions

- Comply with the laws, regulations and standards that apply to our company
- Understand where to go for assistance or guidance if needed.

Contents of the Arrival Code of Business Conduct and Ethics

- Arrival's core principles
- Working environment and employment standards
- Health, safety and wellbeing
- Business ethics and company conduct
- Compliance with laws, rules and regulations
- Complying with the Arrival Code of Business Conduct and Ethics

Arrival's Core Principles

Arrival is committed to high standards of social and environmental responsibility and ethical conduct whilst developing advanced technologies and amazing electric vehicles, a sustainable transport ecosystem and intelligent mobility solutions. We strive to be a company that is well respected by customers and the public through the establishment of transparent, fair business activities and ethical values with great importance placed on the protection of the information of our customers, employees and suppliers.

- **Honesty:** We demonstrate honesty and high ethical standards in all business dealings.
- **Respect:** We treat all parties who engage with Arrival, both internally and externally, with respect and courtesy.
- **Confidentiality:** We protect the confidentiality of Arrival's information and the information of our customers, suppliers and employees.
- **Compliance:** We ensure that business decisions comply with all applicable laws and regulations.

Working Environment and Employment Standards

Arrival is committed to a supportive working environment, where employees have the opportunity to reach their fullest potential. Arrival employees are expected to do their utmost to create a workplace culture that is free of harassment, intimidation, bias, and unlawful discrimination. It is the shared duty of Arrival employees, directors and board members to create a fair, tolerant, respectful and friendly working environment where different opinions are respected, and people are encouraged to question the decisions of others.

Equal Opportunity Employment: Arrival provides equal employment opportunities to all qualified candidates and employees. Employment is based solely upon individual merit and qualifications directly related to professional competence. We strictly prohibit unlawful discrimination or harassment on the basis of race, colour, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental

or physical disability, medical condition, sexual orientation, or any other characteristics protected by law. We also make all reasonable accommodations to meet our obligations under laws protecting the rights of the disabled. More information can be found in our [Equal Opportunities policy](#).

- **Harassment, Discrimination and Bullying:** We strictly prohibit discrimination, harassment and bullying in any form. This includes, verbal, physical, or visual forms and extends to slang or joking in ways that may be offensive to others. There shall be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on (but not limited to) gender, age, disability, national origin, race, marital status, sexual orientation, political opinion, union (or non-union) membership, religion, or caste unless provided for in domestic legislation. Employees must not be expected to perform duties incompatible with their physical or mental abilities.

If you believe you have been bullied or harassed by anyone at Arrival, or by an Arrival partner or supplier, we strongly encourage you to immediately report the incident to your supervisor, the Employee Experience Team or both. Supervisors and managers who learn of any such incident should immediately report it to the Employee Experience Team who will promptly and thoroughly investigate any complaints and take appropriate action. More information can be found in our [Anti-harassment and Bullying Policy](#).

Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action.

- **Drugs and Alcohol:** Arrival is committed to providing a safe, healthy and productive working environment for all its workers, customers and visitors. This includes ensuring that all workers are fit to carry out their duties safely and effectively within the working environment. We expect Employees to demonstrate responsible behaviour at work, work-related functions and work-related social events and to act in a way that will not have a detrimental effect on our reputation. With this in mind, Arrival have implemented and enforced a strict policy for the use and abuse of drugs, alcohol and any other substances that would compromise safety and affect a person's fitness for duty and concentration whilst at work. For more information regarding Arrival's approach to substance abuse and testing, please refer to our [Drug and Alcohol Policy](#). Any employee, visitor or contractor must not report for work, attend site or operate any vehicle or machinery if they are under the influence of alcohol or drugs. Any individual found to be under the influence of alcohol or drugs at work may be subject to disciplinary action.
- **Safe Workplace:** Arrival is committed to providing a safe and inspiring working environment to all of its employees; therefore, all personnel are required to conduct

their duties without endangering the health and safety of others in the workplace. In addition to traditional industrial safety, it is essential to intervene whenever a lack of physical or mental wellbeing is encountered in the workplace. It is every employee's right and responsibility to maintain activities that promote the development of wellbeing for themselves and their work community. When dealing with each other and third parties, an atmosphere of openness and tolerance, respect and politeness, as well as fairness and trust, shall be maintained. We will not tolerate any level of violence or the threat of violence in the workplace. Under no circumstances should anyone bring a weapon to work. If you become aware of a violation of this policy, you should report it to the Employee Experience Team immediately.

Health, Safety and Wellbeing

Health, safety and wellbeing of employees is the top priority at Arrival. We take every reasonable step to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work and strive to create a working environment in which everyone can perform safely and effectively while maintaining their physical and mental health. We conduct regular risk assessments and comply with industrial safety regulations and use required safety equipment bearing in mind the prevailing knowledge of the industry at the present time and of any specific hazards.

No employee at Arrival shall be employed in potentially hazardous conditions without receiving adequate health and safety training and supervision. Employees shall receive health and safety induction training upon joining the company and annual refresher training subsequently. Employees who are working in areas of the business which have been identified as posing a greater health and safety risk will also receive specialist health and safety training as appropriate. Records of health and safety training must be available for inspection. Individual workers must be able to demonstrate their understanding of their job and their ability to perform it to at least the minimum standard required by the Health & Safety Team.

As every effort is made to prevent work related accidents and illness, we ask our employees to do their part to achieve this goal by following safety and health rules and practices and reporting (either openly or confidentially) accidents, incidents, unsafe act or condition, and unsafe behaviour to line manager, the Health & Safety Team or the Compliance Team.

- **Health & Safety Policy Statement:** Arrival's target for health and safety is simple: Zero work-related accidents and occupational illness. The policy statement is a clear commitment by the Company's senior management to achieve this goal by enabling innovation to flourish safely, complying with legal requirements, supporting and promoting a safe workplace, reacting to unsafe acts or conditions with time out for safety, providing best-in-class training, encouraging open and honest communication and continuously improving the health and safety management system.
- **Occupational Safety:** Employees' potential for exposure to safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, and fall hazards) are

identified and assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards.

- **Emergency Preparedness:** Potential emergency situations and events are identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress adequate exit facilities and recovery plans. Such plans and procedures focus on minimizing harm to life, the environment and property.
- **Physically Demanding Work:** Employees exposed to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks are identified, evaluated and ergonomically controlled.
- **Machine Safeguarding:** Production and other machinery is evaluated for safety hazards. Physical guards, interlocks and barriers are provided and properly maintained where machinery presents an injury hazard to workers.
- **Working hours, Work-life balance and Employee Wellbeing:** Arrival workplace culture is based on trust and respect. We strive to support employees in their personal life situations and give them flexibility to remain productive during the important life events. We follow a number of country-specific regulations and provide company-wide policies to maintain a healthy work-life balance and the wellbeing of our employees. Working hours including overtime and voluntary work are not to exceed the maximum set by local laws. Please see our [Mental Health Wellbeing Policy](#), [Maternity Policy](#), [Paternity Leave Policy](#), [Holidays Policy](#), [Grievance Procedure](#) and other employment related policies at Arrival Wiki Hub or contact the Employee Experience team directly.

Business Ethics and Company Conduct

Arrival respects and promotes universal human rights, freedom of opinion and expression, religion and peaceful assembly as well as freedom from any discrimination based on race, age, nationality, gender or sexual orientation. Arrival does not tolerate any use of forced or child labour or human trafficking and treats its diverse community with dignity and respect. Arrival strives to meet the highest standards of social, environmental and ethical conduct, including business integrity, fair and transparent business practices, partnerships, advertising, competition and communication, intellectual property and privacy rights, ethical and responsive material sourcing and manufacturing.

Arrival leadership is committed to ensuring that business practices are compliant with laws and regulations of the countries where it conducts business and all strategic and operational risks

related to this code are identified and mitigated to facilitate continuous improvement and ethical development.

- **Conflicts of Interest:** Arrival employees, managers, directors and board members are expected to act responsibly and in the interest of Arrival if a possible conflict of interests occurs. Conflicts of interest can arise when our personal relationships or financial interests overlap with our job responsibilities. Personal and private financial, political or other personal interests are not allowed to influence business decisions, since they may conflict with the interests of Arrival or its business partners.

Examples of areas where conflicts of interest often arise:

- Personal investments
- Outside employment, advisory roles, board seats, and starting your own business
- Business opportunities found through work
- Inventions
- Friends and relatives; co-worker relationships
- Accepting gifts, entertainment, and other business courtesies
- Use of Arrival products and services

When considering a course of action, ask yourself whether the action you're considering could create an incentive for you, or appear to others to create an incentive for you, to benefit yourself, your friends or family, or an associated business at the expense of Arrival. If the answer is "yes," the action you're considering is likely to create a conflict-of-interest situation, and you should avoid it.

In each of these situations, the rule is the same – if you are considering entering into a business situation that creates a conflict of interest, don't. It is important to understand that as circumstances change, a situation that previously didn't present a conflict of interest may present one.

If you are in a business situation that may create a conflict of interest, or the appearance of a conflict of interest, review the situation with your manager and the Compliance Team.

- **Side-line activities:** Paid side-line activities (in particular, outside employment) by our employees must be disclosed to the responsible manager and the Employee Experience Team before employment starts. The manager and Employee Experience Team will examine whether there could be a conflict of interest, taking into account factors such as the number of working hours dedicated to the side-line activity, whether the other employer could be considered a competitor of Arrival, and whether there could be an ethical conflict with the values of Arrival, which could negatively impact Arrival's reputation (e.g. working for a company that has a reputation for causing environmental

damage) In the event of a conflict of interest, the side-line activity may be prohibited to protect the company's legitimate interests.

- **Shareholdings:** As Arrival employees, we can acquire and hold shares and interests in business partners or competitors only if it is a small-scale investment and the possibility of a conflict of interest or the appearance of a conflict of interest has been ruled out. This rule may not be circumvented by having a third party hold the shares on behalf of the employee. Before joining our company, potential employees who already hold larger than small-scale investments in business partners or competitors are required to disclose them to the responsible manager. This also applies to shares acquired by an employee through an inheritance.
- **Insider Trading:** Insider information is information not known to the public that could affect the price of stock or other financial instruments ("securities"). Information is "material" if a reasonable investor would consider it important in deciding whether to buy or sell that company's securities. Information is "non -public" if it has not been broadly communicated to the investing public. To use non-public information to buy or sell stock, or to pass it along to others so that they may do so, could constitute insider trading.

Arrival strictly prohibits insider trading and any other forms of misuse of insider information about the company and its business partners. This means, we never buy or sell any securities based on material, non-public information and take all necessary and appropriate actions to prevent insider trading.

In our work, we may become aware of material, non-public information not only about Arrival but also companies we do business with. Examples of insider information include sales figures that are not intended for publication, information about merger and acquisition projects, major reorganizations, new appointments to the board of management and supervisory board prior to their official publication, conclusion or cancellation of a major contract with a customer or supplier, important legal disputes, or dealings with government agencies.

Insider trading not only violates this Code, it violates the law. Please refer to Arrival's Insider Trading Policy, which is specifically designed to help employees navigate these issues and/or speak to our Legal Team.

- **Preventing Corruption:** Arrival maintains zero tolerance towards corruption and bribery. We do not tolerate corrupt behaviour by our employees, business partners, customers or any other external parties as it violates a number of UK and Non-UK laws and harms the company's assets, reputation, market competition and business standards. Decisions based on corruption are against our ethical values and even the mere appearance of undue influence must be avoided.

Arrival employees, representatives and business partners must not, directly or indirectly, offer, promise or give bribes to agents, customers, suppliers or other business partners or public officials, or request or accept bribes anywhere in the world. We prohibit illegal and/or facilitation payments, non-cash rewards and other benefits and aim to prevent any such practices through regular training and audits. Please see Arrival's [Anti-corruption and Bribery policy](#) for more information.

- **Gifts and Hospitality (Non-Government officials):** When dealing with business partners and customers, gifts and invitations (collectively referred to as “rewards”) are common practice and permitted within appropriate limits. A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process). As employees, we must not encourage, ask for or demand gifts, invitations, personal services or favours for ourselves or others from business partners. Advertising items and occasional gifts given voluntarily can be accepted if of reasonable value and scope. We accept invitations from business partners to dinners or events only if they are freely given, serve a business purpose, do not occur with excessive frequency and if the invitation is appropriate for the occasion. Gifts must not include cash or cash equivalents (such as vouchers) or be given in secret. Gifts must be given in our name, not your name.

You should refer to Arrival's Anti-corruption and Bribery Policy for more information on exchanging gifts and hospitality. Please contact the Compliance Team if you have any questions regarding gifts of a significant value or gifts for which you are not certain are appropriate.

- **Gifts and Hospitality (Government officials):** We are extremely cautious and especially critical when determining whether it is appropriate to give gifts and invitations to government agency employees, public officials, politicians and employees of government-owned enterprises. Several laws around the world, including the UK Bribery Act and the U.S. Foreign Corrupt Practices Act specifically prohibit the offering, giving, or promising anything of value, either directly or indirectly, to Government officials to encourage them to act improperly or to reward them for doing so. Prohibited payments can take many forms including, but not limited to cash or cash equivalents, gifts, meals, and entertainment.

By contrast, it can be permissible to make infrequent and moderate expenditures for gifts and business entertainment for government officials that are directly tied to promoting our products or services (e.g. providing a modest meal at a day-long demonstration of Arrival products). Payment of such expenses can be acceptable (assuming they are permitted under local law) but require pre-approval from the Compliance Team.

The U.S. also has strict rules that severely limit the ability of a company or its employees to give gifts and business courtesies to a U.S. government official and also

limit the official's ability to accept such gifts. The Honest Leadership and Open Government Act prohibits giving any gifts, including travel and other courtesies, to Members, Officers, and employees of the U.S. Senate and House of Representatives unless they fit within one of a number of specific exceptions. Gifts to employees of the U.S. executive branch are also regulated and subject to limits. State and local government officials in the U.S. are also subject to additional legal restrictions.

If you are unsure what to do or need more information, please speak to our Compliance Team.

- **Choosing Business Partners:** We hold ourselves to high ethical standards, and we expect our representatives, who are the partners, vendors, consultants, and other companies who work on our behalf, to meet the standards we set for ourselves. As such, these third parties are expected to conduct their business in a way that meets high ethical standards and to comply with local legislation in all countries in which they operate. Employees responsible for choosing business partners are obligated to screen them to the extent allowed by law using a transparent selection process to ensure the integrity of the potential business partners.
- **Supplier Selection:** Arrival strives for reliable, fair and mutually beneficial relations with its suppliers. Supplier selection is based on free and fair competition and transparent supplier selection criteria, including objective factors such as quality, reliability, delivery, price and suitability of the product or service offered without preference for personal reasons. Arrival expects all suppliers, and their subsidiaries, affiliates and sub-contractors, to act in accordance with Arrival's Suppliers' Code of Conduct and in full compliance with all applicable laws and regulations. In order to ensure the standards are cascaded throughout the supply chain, Arrival expects suppliers to consistently monitor and enforce these standards in their own operations and supply chain. The agreements we make with customers and suppliers are complete, unambiguous, and documented, including any subsequent changes and additions.
- **Company Assets and Equipment:** Arrival strives to be a company that people want to work for and is well on its way to achieving this through its generosity and openness with resources shared within the company. In order to maintain these practices, Arrival expects all of its employees to conserve and protect its assets, equipment and information. We provide our employees with a wide range of valuable assets to help them to perform their work at the highest level. These assets include computer equipment, communications platforms and equipment, software, office and electronic equipment, and facilities. Arrival employees are expected to treat these assets with care and use them with the interests of the business in mind. This means that assets should be well maintained and not subject to unreasonable use. If something you are using gets damaged, please get it fixed.

In addition, you should use your judgment in using company assets for personal matters. Arrival's assets are property of the company and provided for business use. While we

recognise that personal use occurs, it should not be excessive and should not interfere with performance of your business duties.

- **Donations and Volunteering:** When making donations, we do not expect anything in return. Donations are made only to organizations that have been recognized as charitable institutions. We do not make donations in the pursuit of self-serving financial interests; we neither demand nor expect anything in return. By contrast, our sponsorship activities are conducted in order to positively promote the reputation and public perception of our company through advertising. At the same time, as a company that takes its responsibility to society seriously, we encourage and support the volunteer activities of our employees. We do so regardless of whether those activities are in support of democratic institutions, social activities or charitable giving.

Confidentiality, External Communications and Disclosures

Protecting information and ideas, whether our own or those of others who work with us, is crucial to our business success, reputation and trustworthy partnerships. We use best practices to protect access to Arrival's confidential information and strive to guarantee the confidentiality, integrity and usability of information and materials respective to business partners, customers and other interest groups. We do not use confidential information for Non-Arrival business use and keep it in strict confidence. This responsibility extends to confidential information of third parties that we receive under Non-disclosure Agreements.

- **Confidential information:** Arrival's confidential business information is a valuable asset, which, if leaked prematurely into the press or to competitors, can hurt our product launches, eliminate our competitive advantage and prove costly in other ways. On the other side, we lose trust and damage our reputation if we disclose confidential information, we learn from the companies we do business with. Confidential information includes, but is not limited to, proprietary data, trade secrets and know-how such as software and product designs, product plans, inventions, laboratory notebooks, processes, designs, drawings, engineering, customer lists, employee data (other than your own), financial information, budgets, pricing, business plans, or other business information. Beware of any photographs you or your visitor(s) take at any of our Arrival sites. It is the responsibility of each employee to be sure that those pictures do not contain any confidential information.
 - **Arrival Network:** Arrival's network and hardware contain the most valuable physical and intellectual assets of the company. Therefore, it is vital that if you believe our network has been violated or compromised, you report this to the IT Team immediately. More information on the security of our network and hardware can be found in our [Acceptable Use Policy](#).
- **Information Disclosures:** At times, a particular project or negotiation may require you to disclose Need to Know or Confidential Information to an outside party: Disclosure

of that information should be on an “only as needed” basis and only under a Non-disclosure Agreement. Be sure to conduct the appropriate due diligence and have the appropriate agreement in place before you disclose the information. If you find yourself having family or other personal relationships with people employed by our competitors or business partners, use your common sense. Don’t tell your significant other or family members anything confidential, and don’t solicit confidential information from them about their company. If you are unsure what to do or need more information, please speak to our Legal Team.

- **Confidential information of Business Partners:** In the same way that Arrival requires employees to be careful not to disclose confidential Arrival information, it is equally as important not to disclose any confidential information from our business partners. Do not accept confidential information from other companies without first having all parties sign an appropriate Non-disclosure Agreement approved by the Legal team. Even after the agreement is signed, try only to accept as much information as you need to accomplish your business objectives.
- **External Communications:** Arrival’s policy is to be extremely careful about what information we disclose. For that reason, you are expected to ensure that your external communications (including online and social media posts and communications with the press) do not disclose confidential proprietary information or represent (or otherwise give the impression) that you are speaking on behalf of Arrival unless you are authorised to do so by the company.

Consult with the PR Team before accepting any public speaking engagement on behalf of the company and check our [Social Media Policy](#). If you are unsure what to do or need more information, please speak to our Chief of Communications. Also, please refer to our Regulation FD and External Communication Policy which outlines our policies on external communications.

Compliance with Laws and Regulations

We are responsible for abiding by the laws that apply in our field of activity and are required to assess our working environment continuously from the standpoint of legality, responsibility, and fairness in all of the countries in which we conduct business. We adhere to the principle of legality in all of our dealings, actions, contracts, and other activities including the payment of applicable taxes and customs duties, compliance with competition and antitrust laws, a prohibition of corruption and money laundering, procurement of the required official licenses, international trade laws and labour standards. If requested, the Legal and Compliance Teams hold information and training sessions to promote compliance with laws, rules and regulations that apply to us. In the event that these laws and regulations are less comprehensive or strict than our own standard, we will always apply the Arrival standard. If you are faced with a decision and need guidance from a legal standpoint, please seek advice from your supervisor who will consult with the Legal and/or Compliance Teams.

- **Competition and Antitrust Laws:** Competition laws prohibit arrangements with competitors that restrain trade in some way, abuse of intellectual property rights, and the use of market power to unfairly disadvantage competitors. Certain conduct is absolutely prohibited under these laws, and could result in your imprisonment, and severe penalties for Arrival.

Arrival observes the rules of fair and honest competition as defined by applicable laws and treats its competitors respectfully. In following the laws, we are not allowed to exchange information or reach agreements on allocation of territories and customers, prices and components of prices, supply relationships and the conditions governing them, production capacities, and the terms and conditions of bids with our competitors. The same applies to exchange of information concerning market strategies and investment strategies. We are aware that it is prohibited not only to make written agreements in this respect, but also to make verbal agreements and to practice tacit, conscious parallelism (pricing strategies that occur without actual agreement between the players). Other activities can also be illegal, unfair, or create the appearance of impropriety. Such activities include manipulation, abuse of privileged information and misrepresentation of material facts. It is also illegal to enter into a business arrangement or pursuing a strategy with the sole purpose of harming a competitor or to use Arrival's size or strength to gain an unfair competitive advantage.

We also comply with the applicable national regulations governing anti-competitive clauses in contracts with customers and suppliers.

- **Trade Control Laws and Regulations:** Arrival is committed to conducting business everywhere in full compliance with applicable export control laws and regulations, at all times. All of us in the company are accountable for ensuring compliance with U.K. requirements as well as with those of all other countries in which we are sending or making Arrival products, services, software, equipment, or any form of technical data available. Arrival is committed to having a robust internal compliance program that is able to identify and safeguard all controlled products, technologies and services; ensure appropriate export licenses exist to authorise any transfer involving suppliers, customers, business partners, and other third parties; screen all transactions for relevant sanctions and restricted party lists; confirm that the ultimate end-use, end-user, and destination are authorised; and maintain accurate records and effective reporting mechanisms. Arrival employees are trained and consulted on international trade laws and process matters and are professionally assisted if in doubt about the right course of action in any case involving the import or export of controlled items.
- **Money laundering prevention:** As a global company, Arrival complies with national and international economic sanctions and regulations and supports the fight against money laundering and terrorist financing. Money laundering (i.e. using transactions to conceal the illegal source of funds or make such funds look legitimate) is strictly

prohibited at Arrival. Employees of the involved units are required to always keep up to date on current sanctions lists. Employees responsible for business processes are obligated to design these in such a manner that they prevent all forms of financial crime. Any suspicious activity that you believe involves money laundering should be immediately reported to the Compliance Team or the Chief Financial Officer. Some examples of suspicious activity include:

- Large payments in cash,
 - Payments made in currencies atypical given the circumstances or differing from what is listed in the contract.
 - Requests for payment amounts that differ from what is required in the contract; or
 - Payments made by someone or a company that is not party to the contract.
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- **Data Protection and Information Security:** We create trust among our employees, business partners and customers by respecting data protection as a personal right. That is why we process and use personal data only to the extent permitted by laws, regulations and the data subjects themselves. In all our business processes we do our best to ensure that privacy is safeguarded, personal data is protected, and all business information is kept secure in such a way that guarantees the continuity of business operations even in the event of disturbances and during exceptional situations. All employees bear responsibility for protecting personal data against unauthorized access by third parties and should take all measures necessary to prevent unauthorized usage, access and loss. When developing Arrival products and services, we ensure that legal requirements governing data protection and information security as well as associated risks are taken into account at an early stage.
 - **Employee Data:** Arrival supports the right to privacy, including the rights of individuals to control the dissemination and use of personal data that relates to them, or describes them, their personal choices or life experiences. We collect and store personal information from employees from around the world and expect our employees to access this data in line with domestic and international laws and regulations that seek to protect the privacy rights of our employees. Employee data must only be collected and stored for the purpose of enabling you to do your job effectively and in a manner consistent with our Data Privacy Policy.

 - **Complying with Environmental Legislation:** Arrival is building a sustainable transport ecosystem by supporting the global transition from fossil-fuel powered vehicles to electric vehicles. We adhere to environmental legislation and regulations globally and strive to operate in accordance with the principles of sustainable development. We have a strong Environmental Policy (link will be inserted here). In leading by example, we will set the precedent for producer responsibility, and hold ourselves accountable to the highest standards. Arrival's position as a start up enables

a clean slate approach to solve the environmental challenges we are faced with, using our unique set of design principles.

- **Intellectual Property Laws:** Innovation lies at the very heart of Arrival. We actively encourage employees to be innovative and unique whether they work on an individual task or are collaborating with other teams. We want to ensure that all of our ideas and solutions are truly exceptional. With that being said, our intellectual property, which includes patents, inventions, software and other copyrighted materials, know-how, trade secrets, brands and trademarks, is one of our most valuable assets. Arrival protects its own intellectual property and secret business information and does not share it without authorization. Any unauthorised use or disclosure could lead to the loss of intellectual property or serious loss of value to our company and may result in disciplinary action. More information about processes for protecting our intellectual property can be found in our [IP Policy](#).

Equally importantly, we respect the intellectual property rights of others. Inappropriate use of others' intellectual property may expose us to civil or criminal penalties. It is therefore very important to seek advice from the Legal Team before you solicit, accept, or use proprietary information from individuals outside the company or let them use or have access to Arrival's proprietary information. You should also check with the Legal Team if you are developing a product that uses content not belonging to Arrival, feel unsure or need to know more about our intellectual property strategy and compliance.

Financial Integrity and Responsibility

Financial integrity is vital to Arrival's reputation amongst its investors, customers, business partners, suppliers, regulators, government entities, employees and professional advisors and is vital to the maintenance and enhancement of the company's value. Arrival is committed to maintaining honest, accurate, complete and timely records in relation to all aspects of our business, in particular with respect to financial reporting and accounting standards and regulations.

- **Financial Reporting and Tax Strategy:** Arrival complies with all applicable accounting and financial reporting rules. All financial reporting in the company is based on the International Financial Reporting Standards. Arrival will under no circumstances falsify or counterfeit financial or other documents or create misleading information. The company shall comply with the tax laws and regulations of each country in which it operates. Where tax laws do not give clear guidance, prudence, a conservative approach and transparency shall be the guiding principles.
- **Retaining Records:** All financial transactions must be properly authorized in accordance with Arrival's policies and must be recorded in company books. All of Arrival's books, records, accounts and financial statements must be maintained in reasonable detail and must appropriately reflect the transactions. Our Document

Management Policy contains details on how long we need to retain records at Arrival in order to comply with legal requirements and accounting rules, as well as how to store Arrival records.

- **Spending Arrival's Money:** When claiming any expenses or you spend any money on Arrival's behalf, you must make sure that the cost is justifiable, reasonable, directly related to company business and supported by proper documentation. All purchases made on behalf of Arrival must be approved by your manager who is responsible for all money spent and expenses incurred for your department. If you need more information on expenses, please refer to our Expense Policy. Alternatively, if you require more information on procurement on behalf of Arrival, please speak to our Procurement Team.
- **Signing Contracts:** Every time you enter into a business transaction with another party on Arrival's behalf, the contract or terms should be approved by the Legal Team. You should never sign a contract on behalf of Arrival unless you are authorised to do so as a signatory of the company or the contract has been approved by the Legal Team. All contracts at Arrival should be in writing and should contain all the relevant terms of the deal. If you need more information on contracts, please speak to our Legal Team.

Compliance with the Arrival Code of Business Conduct and Ethics

The Standards of this Code apply to all Arrival "employees," which means its Board of Directors, and all employees, directors and executive officers of Arrival. When we refer to "Arrival" we mean all Arrival group companies and its affiliates.

It is the responsibility of all Arrival employees to uphold the standards of this code, which means you must:

- Read, understand, and comply with these standards, and the policies, laws, and regulations that apply to your role
- Speak up when you see possible violations of the Code, Arrival policies, and legal and regulatory requirements. (Please find details of our confidential whistleblowing system below.) Be truthful and cooperate fully in any internal investigations. Do not conceal or destroy information.
- Complete training on the Code and attest that you understand and commit to comply with the standards of this Code. Failing to read or attest to the standards does not excuse you from these responsibilities.

Arrival's standards of business conduct and ethics, as set out in this policy, and its Compliance Program, are endorsed by and have the full support of Arrival's General Counsel and Board of Directors. The Board of Directors, management and Compliance Team are responsible for overseeing compliance with these standards.

- **Managing errors:** Part of who we are involves learning from mistakes as individuals and as an organization. Our approach to managing errors is therefore transparent and open, and we share our experiences in order to enable progress and innovation. We promote the culture of respectful interaction and encourage our managers to explain the reasons for their decisions to their team members in order to enlist their support with objectives, ensure transparency during decision making and avoid errors and violations of ethical standards as far as it is reasonably possible. At the same time, within their area of responsibility the executive management of every operating unit is responsible for compliance with the rules contained in this Code as well as with any additional company rules.
- **Treatment of Violations:** If we observe a violation of this Code, related policies or any other applicable regulations, we will not hesitate to address it. Violations of laws, policies and other regulations can lead to massive financial losses, regulatory and/or criminal convictions and fines, severe damage to our image and reputation, and civil actions by investors. For these reasons, violations must be detected in a timely manner in order to prevent Arrival and its employees from suffering harm. If you as an employee observe rules or regulations being violated or have reason to suspect that a violation of a rule or regulation has been committed, we ask you not to hesitate in addressing it.

Our confidential whistleblower system is open to all employees, business partners and third parties who wish to report violations of rules or regulations that pose a serious threat to the company and its employees. If employees wish to report violations, please do so using the following:

Web Intake Site: arrival.ethicspoint.com

Mobile Intake Site: arrivalmobile.ethicspoint.com

Hotline: From an outside line dial the direct access number for your location: 0-800-89-0011 and at the English prompt dial 833 679 2183.

Arrival strives to maintain the highest possible level of confidentiality while managing cases through the whistleblowing system. That is the reason why our whistleblowing system is externally sourced and technically supported. Moreover, our whistleblower system places value on fairness – in dealing with both whistle-blowers and employees affected by an allegation. It also always applies the principle of proportionality. We examine each case individually to determine which consequences are suitable, necessary and appropriate. Please see our Whistleblowing Policy for more information and detailed guidance on how you can raise a concern and speak up about violations.

- **Support and Assistance** This Code of Business Conduct and Ethics cannot provide specific answers to every question and situation. If you are unsure and need guidance for your daily activities at work or if you have questions about acting with integrity or

the Code, please feel free to contact the Compliance Team at Compliance@Arrival.com. Alternatively, you can reach out to your manager or the Employee Experience team at EX@Arrival.com.