MOBILEYE GLOBAL INC.
CODE OF BUSINESS CONDUCT

(As adopted by the Board of Directors on September 3, 2026)

1. Introduction

This Code of Business Conduct (the "**Code**") covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all directors, officers, employees and consultants of Mobileye Global Inc. and its subsidiaries (collectively, the "**Company**"). All directors, officers, employees and consultants of the Company must conduct themselves accordingly and seek to avoid even the appearance of improper behavior. The Code should also be provided to and followed by the Company's other agents and representatives.

If you violate the standards in the Code, you may be subject to disciplinary action, up to and including immediate termination of employment.

If a law conflicts with a policy in the Code, you must comply with the law. If you have any questions about these conflicts, ask your manager or the Company's General Counsel how to handle the situation. The Code supersedes all other codes of conduct, policies, procedures, instructions, practices, rules or written or verbal representations to the extent that they are inconsistent with the Code. We are committed to continuously reviewing and updating our policies and procedures. The Code, therefore, is subject to modification.

2. Purpose

The Code seeks to deter wrongdoing and to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the United States Securities and Exchange Commission (the "**SEC**") and in other public communications made by the Company;
- Compliance with applicable governmental laws, rules and regulations;
- The prompt internal reporting to an appropriate person or persons identified in the Code of violations of the Code; and
- Accountability for adherence to the Code.

3. Compliance With Applicable Laws, Rules and Regulations

Obeying the law is the foundation on which the Company's ethical standards are built. You must comply with applicable laws, rules and regulations. Although you are not expected to know the details of these laws, it is important to know enough to determine when to seek advice from managers or other appropriate personnel. We act as a responsible corporate citizen, respect human rights and manage the impact of our business on the world around us.

We also expect our suppliers to comply with all applicable laws and regulations and the Company's Code. We expect our suppliers to hold their direct supply chain accountable to these expectations.

4. Customers, Suppliers, Distributors and Others

In our marketing and in our interactions with customers and potential customers, we always represent the Company's products and services fairly and accurately.

Independent contractors, consultants, suppliers, distributors and others who conduct business with the Company risk termination of their relationship with the Company for violations of the Code.

5. Conflicts of Interest

A "conflict of interest" exists when a person's private interests interfere or conflict in any way with the interests of the Company. Examples of when a conflict of interest may arise include, but are not limited to:

- When a director, officer or employee takes actions or has interests that may make it difficult to perform his or her work objectively and effectively.
- When a director, officer or employee, or a member of his or her family, receives improper personal benefits as a result of his or her position with the Company.
- Almost always, when an employee works simultaneously for a competitor or, except on our behalf, a customer or supplier. You are not allowed to work for a competitor in any capacity.
- When a director, officer or employee serves as a director of any company that competes with the Company.
- When a director, officer or employee has a business or financial interest in a customer, supplier, developer or competitor of the Company. In deciding whether to make such an investment, you should consider the size and nature of the investment, your ability to influence decisions of the Company or of the other company, your access to confidential information of the Company or of the other company, and the nature of the relationship between the Company and the other company.
- When a director, officer or employee conducts Company business with a relative or significant other, or with a business with which a relative or significant other is associated in any significant role. Relatives include spouse, sister, brother, daughter, son, mother, father, grandparents, aunts, uncles, nieces, nephews, cousins, step relationships and in-laws. Significant others include persons living in a spousal or familial fashion (including same sex) with an employee.

Conflicts of interest are prohibited as a matter of the Company's policy, except in the case of any director or executive officer, with the informed written consent of the Board of Directors of the Company (the "**Board**") or pursuant to guidelines approved by the Board, or in the case of any other employees, with the

informed written consent of the Company's General Counsel or pursuant to guidelines approved by the Company's General Counsel. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with higher levels of management or the Company's General Counsel. If you become aware of a conflict or potential conflict, you should bring it to the attention of a manager or other appropriate personnel or consult the procedures described in Section 24 of the Code.

6. Public Disclosure of Information

United States federal securities laws may require the Company to disclose certain information in various reports that the Company must file with or submit to the SEC. In addition, from time to time, the Company makes other public communications, such as issuing press releases.

The Company expects all directors, officers and employees who are responsible for the preparation of SEC reports or other public documents or the contribution of information for such reports or documents, to ensure that the information disclosed in those documents is accurate, reliable and complete.

To the extent that you reasonably believe that questionable accounting or auditing conduct or practices have occurred or are occurring, report those concerns to the General Counsel or in accordance with the Company's Whistleblower Policy.

In addition, only authorized spokespersons may make public statements on behalf of the Company to the media or investors. If you are contacted by a reporter, blogger, analyst or the public requesting comments on behalf of the Company on a topic for which you are not authorized by the Communications Department and the manager of your business group to speak on behalf of the Company, do not respond. Immediately refer the inquiry to the Communications Department or Legal.

7. Insider Trading

You are not permitted to use or share confidential information for stock trading purposes or for any other purpose, except the conduct of our business. All non-public information about the Company should be considered confidential information. To use "material non-public information" about the Company or the market for the Company's securities for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is not only unethical, but also illegal, and could result in criminal prosecution in addition to the termination of your employment. "Material non-public information" includes information that is not available to the public at large that could affect the market price of the Company's or another company's securities and that a reasonable investor would consider important in deciding whether to buy, sell or hold the securities. In order to assist with compliance with laws against insider trading, the Company has adopted a Securities Trading Policy. A copy of that policy, which has been distributed to every employee, is available on the Company's internal website. If you have any questions, please consult the Company's Chief Financial Officer or General Counsel.

8. Corporate Opportunities

You are prohibited from taking for yourself opportunities that are discovered through the use of corporate property, information or position without the informed prior consent of the Board. You may not use corporate property or information obtained through your position with the Company for improper personal gain, and you may not compete with the Company directly or indirectly. Furthermore, you owe a duty to the Company to advance its legitimate interests when such an opportunity arises.

9. Competition and Fair Dealing; Antitrust

The Company seeks to outperform its competition fairly and honestly. Using or disclosing, or encouraging others to use or disclose, other companies' proprietary, confidential or trade secret information, without the owner's prior consent, and any theft or misappropriation of such information is strictly prohibited. You should endeavor to respect the rights of and deal fairly with the Company's customers, suppliers, competitors and employees.

Antitrust laws, sometimes also called competition laws, govern the way that companies behave in the marketplace. Antitrust laws encourage competition by prohibiting unreasonable restraints on trade. Violating antitrust laws is a serious matter and could place both the Company and the individual at risk of substantial criminal penalties.

To adhere to antitrust laws, you must not:

- Communicate with any competitor relating to price, any term that affects pricing or production levels,
- Divide or allocate markets or customers,
- Agree with a competitor to boycott another business, or
- Put inappropriate conditions on purchases or sales.

When questions arise regarding the above, contact Legal for guidance.

10. Gifts, Meals, Entertainment and Travel

The purpose of business gifts, meals, entertainment and travel ("GMET") in a commercial setting is to create good will and sound working relationships, not to gain unfair advantage with customers. However, the exchange or provision of GMET may create a real or perceived conflict of interest or a situation where those expenses could be viewed as a bribe under applicable laws and international standards. The Company expects its employees and third parties to comply with the following principles when giving or receiving GMET:

- we comply with anti-corruption laws,

- no cash gifts,
- the GMET must be for a legitimate purposes, such as to provide, demonstrate or explain a company product, position or service,
- the GMET must not place the recipient under any obligation – we do not offer, promise or give anything of value with the intent to improperly influence any act or decision of the recipient in the Company's or your company's favor or with the intent of compromising the recipient's objectivity in making business decisions,
- the GMET must be made openly and transparently, be reasonable and appropriate to the business relationship and local customs and not cause embarrassment by its disclosure; any entertainment that is unsavory, sexually oriented or involves adult entertainment is strictly prohibited,
- accurately record all GMET provided on the Company's behalf,
- you may give GMET to a government official (including employees of government agencies, public institutions and state-owned enterprises) only in limited circumstances and only with proper approvals, and
- does not otherwise violate any laws or regulations.

Please discuss with your manager any gifts or proposed gifts that you are not certain are appropriate.

11. Discrimination, Harassment and Retaliation

The diversity of the Company's employees is a tremendous asset. The Company is firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination, harassment or retaliation of any kind. Examples of such behavior include derogatory comments based on racial or ethnic characteristics and unwelcome sexual advances.

The Company is committed to providing a workplace free of harassment based on the personal characteristics such as race, ethnicity, religion, religious creed, sex, national original, ancestry, age, physical or mental disability, medical condition, genetic information, military and veteran status, marital status, pregnancy, gender, sexual orientation or any other characteristic protected by local law, regulation or ordinance. The Company strongly disapproves of and does not tolerate harassment of employees by managers or co-workers. We must treat co-workers, customers, and suppliers with dignity and respect.

12. Human Trafficking, Child and Forced Labor

The Company believes human trafficking, forced, debt bonded, indentured, and slave labor are unacceptable, and is committed to preventing these practices in its operations and supply chain. The Company's Code and policies prohibit harsh or inhumane treatment, including corporal punishment or the threat of

corporal punishment. In addition, our policies require compliance with applicable child labor laws. We expect our suppliers to meet these expectations.

13. Health and Safety

The Company strives to provide its employees with a safe and healthy work environment. We comply with the safety laws, standards and guidelines that apply to our business. Sound safety practices are important in all of our workplaces. You are responsible for helping to maintain a safe and healthy workplace for all employees by following safety and health rules and immediately reporting accidents, injuries and unsafe equipment, practices or conditions.

Violence and threatening behavior of any kind are not permitted. Employees must report to work in condition to perform their duties, free from the influence of illegal drugs or alcohol. The abuse of alcohol or illegal drugs in the workplace will not be tolerated.

14. Environment

A number of environmental laws, standards, requirements and policies apply to the Company's worldwide business operations, practices and products. We have a responsibility to understand and follow these requirements, including:

- Conserving energy, water, raw materials and other natural resources,
- Managing materials and wastes properly, and
- Complying with environmental permits and health and safety requirements.

The Company supports a precautionary approach to the materials used in its products and strives to reduce and minimize the use of hazardous materials and the environmental impact of our manufacturing technologies.

The Company expects its suppliers and others to comply with all applicable environmental, health and safety laws and standards in their operations.

15. Record-Keeping

The Company requires honest and accurate recording and reporting of information in order to make responsible business decisions and to comply with the law. For example, employees who must report their hours worked must only report the true and actual number of hours worked (whether for purposes of individual pay or for purposes of reporting such information to customers). The Company also requires each director and employee to disclose any transaction or arrangement among such individual or any family member or affiliated entity of such individual, on the one hand, and any other director, employee or any family member or affiliated entity of such other individual, on the other hand, that in any way relates to or arises out of such individual's professional relationship with the Company.

Many employees regularly use business expense accounts, which must be documented and recorded accurately in accordance with the Company's policies. If you are not sure whether you may seek reimbursement for a certain expense, ask your manager or the Chief Financial Officer.

All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the Company's transactions and must conform both to applicable legal requirements and to the Company's system of internal controls. Unrecorded or "off the books" funds or assets should not be maintained unless permitted by applicable law or regulation.

Business records and communications often become public, and you should avoid exaggeration, derogatory remarks, guesswork or inappropriate characterizations of people and companies that can be misunderstood. This policy applies equally to e-mail, internal memos and formal reports. Records should always be retained or destroyed according to the Company's record retention policies. In accordance with those policies, in the event of litigation or governmental investigation, please consult the Company's General Counsel.

16. Privacy

Many countries have privacy laws that govern the appropriate collection and use of personal information, which includes any information relating to an identifiable individual such as an email address, physical address, payment card information or government identification number. The Company is committed to protecting the reasonable privacy expectations of everyone with whom the Company does business in accordance with applicable law, including customers, suppliers and employees.

17. Intellectual Property

Intellectual property rights are crucial to protecting the investments that companies and individuals make in developing new products and ideas. The Company protects its intellectual property and respects the intellectual property rights of others. We may not copy, reproduce or transmit protected material, such as writing, artwork, music, video, photographs, movie clips and software unless we have authorization or license to do so.

18. Confidentiality

You must maintain the confidentiality of confidential information entrusted to you by the Company, its suppliers or its customers, except when disclosure is authorized by the Company's established written policies or its General Counsel or required by applicable law or regulation. Physical assets and documents must be handled in compliance with information security policies. Confidential information includes all non-public information that might be of use to competitors, or harmful to the Company or its customers, if disclosed, and information that suppliers and customers have entrusted to us. We must use the confidential information of the Company or others only for business purposes and disclose it only to those who are authorized and have a need to know. The obligation to preserve confidential information continues even after employment ends. In connection with this obligation, every employee is required to sign a confidentiality and proprietary information agreement when he or she begins his or her employment with the Company. Furthermore, we must

not request or encourage anyone to use or disclose privileged or confidential information unless they are authorized to do so by the owner of that information.

19. Protection and Proper Use of the Company's Assets

You should endeavor to protect the Company's assets and ensure their efficient use. Our assets include physical assets, the Company's intellectual property, information, Company brands, and the Company's name and reputation. Any suspected incident of fraud or theft must immediately be reported for investigation. The Company's equipment may not be used for non-Company business, though limited incidental personal use is permitted if such use does not interfere with an employee's job duties or performance and it does not put the Company or its property at risk.

While we respect employee privacy, we should not assume that our desk, office or cubicle or use of compute devices or telephone equipment is private or confidential. Subject to local laws and under the guidance of Legal, the Company may search and review both incoming and outgoing communications and all device information, including any password-protected employee information.

Your obligation to protect the Company's assets includes protecting its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of such information would violate the Company's policy and could also be illegal and result in civil or even criminal penalties.

Please see Section 17 hereof regarding the protection of Intellectual Property.

Please see Section 18 hereof for more information regarding the protection of Confidential Information.

20. Internet and Social Media

The value of the Company's reputation and name must be upheld whenever we represent the Company. When speaking on business or technology topics in a public setting or posting on the Internet – including through social media applications and websites – you must make it clear you are expressing your own views and not those of the Company, unless you are speaking as an authorized spokesperson of the Company.

21. Anti-Bribery and Anti-Corruption

The United States Foreign Corrupt Practices Act and other laws applicable to the Company prohibit giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business. It is strictly prohibited to make illegal payments to government officials of any country. The Company's policy is to comply with all anti-corruption laws and to accurately reflect all transactions in the Company's books and records. The Company's prohibition against offering, promising or paying bribes also applies to third parties who provide services to act on the Company's behalf, such as

suppliers, agents, contractors, consultants and distributors. We must never engage a third party whom we believe may attempt to offer a bribe in connection with the Company's business.

In addition, the United States and Israeli governments have a number of laws and regulations regarding business gratuities that may be accepted by government personnel. The promise, offer or delivery to an official or employee of any of these governments of a gift, favor or other gratuity in violation of these rules would not only violate the Company's policy, but could also be a criminal offense. State and local governments in the United States and Israel, as well as other foreign governments, may have similar rules. The Company's Chief Financial Officer or General Counsel can provide guidance to you in this area.

22. Waivers of the Code

Waivers of the Code may only be granted by the Company's General Counsel; provided, however, that any waiver of the Code for executive officers or directors may be granted only by the Board or a Board committee. Any such waiver of the Code for executive officers or directors, and the reasons for such waiver, will be disclosed in the Company's public filings, as required by law or securities market regulations.

23. Reporting Illegal or Unethical Behavior

You are encouraged to talk to managers or other appropriate personnel about observed illegal or unethical behavior or when in doubt about the best course of action in a particular situation. It is the policy of the Company not to allow retaliation for reports of misconduct by others made in good faith by employees. You are expected to cooperate in internal investigations of misconduct.

You may, on an anonymous basis, submit a good faith concern regarding observed illegal or unethical behavior or questionable accounting or auditing matters without fear of dismissal or retaliation of any kind in accordance with the Company's Whistleblower Policy.

24. Compliance Procedures

We must all work to ensure prompt and consistent action against violations of the Code.

To reinforce compliance with the requirements herein, Mobileye requires employees to complete periodic training on key topics covered by this Code, including, but not limited to, lawful and ethical conduct, anti-bribery and anti-corruption, conflicts of interest, confidentiality, intellectual property and insider trading. This training is designed to help employees understand applicable laws, regulations, and the Company's expectations regarding ethical business conduct.

However, in some situations it is difficult to know if a violation has occurred. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.

- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? These questions will enable you to focus on the specific question you are faced with and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.

- Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.

- Discuss the problem with your manager. This is the basic guidance for all situations. In many cases, your manager will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is your manager's responsibility to help solve problems.

- Seek help from the Company's resources. In the rare case where it may not be appropriate to discuss an issue with your manager or where you do not feel comfortable approaching your manager with your question, discuss it with the Company's General Counsel or head of Human Resources.

- You may report ethical violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected to the greatest extent possible. The Company does not permit retaliation of any kind against employees for good-faith reports of ethical violations.

- Always ask first, act later. If you are unsure of what to do in any situation, seek guidance.

25. Placement on Website

This Code of Conduct will be placed on the Company's website.

26. No Legally Binding Rights

This Code is intended as a statement of fundamental policies which applies within the Company, in relation to the persons covered by the Code as stated herein, and no director, officer, employee, consultant, agent or representative of the Company, or any third party, may derive any legal rights from this Code.