



## Supplier Code of Conduct

Effective May 2026

### Our Commitment and Expectations for Suppliers

Mobileye maintains a steadfast commitment to upholding ethical business conduct, labor practices, human rights protections, and environmental stewardship. Our suppliers and vendors must ensure secure, safe and healthy work environments, honor worker dignity and respect, demonstrate fairness and integrity, and implement environmentally sustainable practices in all locations where they manufacture products, supply or provide us with products and services.

Suppliers and their workforce, staff, representatives, contractors, affiliated entities, and subsidiaries (collectively "Suppliers") must observe this Supplier Code of Conduct ("SCOC") when engaged with us or acting as our representatives. This SCOC governs all Suppliers furnishing goods or services to us or for integration with our products. Suppliers must ensure that any third parties or business partners engaged to support work performed for Mobileye comply with this SCOC with respect to activities directly related to such work.

All Suppliers must conduct their operations in accordance with applicable laws and regulations and this SCOC, applying whichever are more stringent. Certain aspects of this SCOC may exceed statutory requirements to promote social responsibility, environmental protection, and business integrity. Under no circumstances may compliance with this SCOC contravene applicable law. If compliance with this SCOC would conflict with applicable law, the applicable law shall prevail; however, the Supplier must promptly notify Mobileye so that expectations can be aligned to meet the intent of the higher standard, to the extent legally permissible.

We have established guidelines and policies in this SCOC that articulate our compliance expectations for Suppliers. Suppliers are responsible for establishing and maintaining appropriate processes and initiatives to achieve and sustain alignment with this SCOC. While Suppliers must self-evaluate and validate their compliance, we reserve the right to audit Suppliers, review their practices and visit their facilities to verify adherence. Subject to customary confidentiality obligations, for Suppliers engaged in manufacturing physical products, including hardware components, such assessment may include evaluations requiring unrestricted worker access, determined by necessity and risk assessment.

Suppliers must immediately notify their designated contact, our management representatives, or the contacts specified in this document when circumstances arise that cause or may cause, actual, potential or suspected violations of this SCOC. Any breaches of this SCOC may compromise a Supplier's commercial relationship with us, and may have various consequences, including, but not limited to, potential termination of the relationship with Mobileye. Compliance with this SCOC and completion of any required SCOC trainings are mandatory, in addition to any obligations specified in existing contracts with us.

# Ethical Business Conduct and Legal Compliance

## Anti-Corruption, Anti-bribery and Ethical Business Practices

All Suppliers must maintain the highest levels of ethical conduct and transparency throughout their business operations and relationships. A zero-tolerance approach shall be enforced regarding all forms of bribery, corruption or extortion. Suppliers shall adhere to all applicable anti-corruption laws including, but not limited to, the U.S. Foreign Corrupt Practices Act and the UK Bribery Act and ensure all business dealings are reflected within their books. Suppliers should implement and monitor an anti-corruption and anti-bribery policy within their company and ensure no improper promotion of business interests is conducted. Suppliers shall report any violation, or potential or suspected violation of the applicable anti-corruption law of any of its employees, contractors or other representatives.

## Conflicts of Interest

Suppliers shall avoid conflicts of interest and must promptly disclose any situations where personal, financial, or business interests may conflict with their obligations to us. This includes but is not limited to financial interests in competing organizations and personal relationships with our employees.

## Export Controls and Entity Screening

Suppliers shall adopt policies and implement entity and transaction screening protocols to ensure compliance with export control regulations. The screening must utilize current entity-lists published by relevant governmental authorities globally. Suppliers shall not supply services, products or anything else to Mobileye without assuring such controls have been performed.

## Intellectual Property Rights and Confidential Information

Suppliers shall respect and not infringe intellectual property rights of others and maintain strict confidentiality of proprietary information. Suppliers must ensure proper licensing for any third-party intellectual property used in their work and shall not engage in counterfeiting, piracy, or unauthorized use of protected intellectual property.

## Data Protection, Privacy and Information Security

Suppliers shall comply with all applicable data protection and privacy laws and regulations, including but not limited to the General Data Protection Regulation (GDPR). Suppliers must adopt, implement, conform, maintain, and continually update appropriate technical and organizational measures, processes, and safeguards to ensure the lawful collection, use, processing, storage, transfer, and protection of Personally Identifiable Information (PII) against unauthorized or unlawful processing, accidental loss, destruction, or damage.

Suppliers shall notify the Company without undue delay after becoming aware of any personal data breach, unless it is determined that such breach is unlikely to result in a risk to the rights and freedoms of natural persons.

## Competition and Antitrust Compliance

Suppliers must uphold the principles of fair competition and market integrity by complying with all relevant antitrust and competition laws governing their business territories. They should conduct commercial activities ethically, avoid anti-competitive behaviors, maintain market transparency, and ensure their practices

support healthy competitive environments in accordance with applicable legal frameworks.

#### Subcontracting and use of Third Parties

Suppliers shall not engage third party subcontractors for the purpose of providing a service or rendering a deliverable to Mobileye, without Mobileye's prior written consent.

#### Responsible Sourcing and Conflict Minerals

Suppliers must adopt, implement, conform, maintain, and continually update comprehensive responsible sourcing policies and robust due diligence procedures for all raw materials, with particular focus on tantalum, tin, tungsten, gold, and cobalt. These systems shall incorporate specialized tracking and monitoring mechanisms to identify, assess, and mitigate human rights and environmental risks throughout the entire supply chain, from extraction through transportation and utilization and furnish any requested supporting documentation in this manner upon request. All processes must align with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or equivalent recognized frameworks, and include effective risk identification, mitigation, ongoing monitoring, remediation, and transparent reporting protocols.

#### AI and Data Usage

Suppliers shall not use any data, information, or materials provided or made available by the Company for any purpose other than the performance of services or delivery of goods under the applicable agreement. Under no circumstances shall such data be used to train, fine-tune, or otherwise develop any artificial intelligence or machine learning models, including generative AI systems. This restriction applies regardless of whether the AI tools are proprietary, third-party, or publicly available.

Suppliers shall not use any form of Artificial Intelligence (including generative AI and machine learning tools) to process, analyze, or otherwise handle Company data or information provided by the Company, *unless* the Company gives express prior written consent.

#### Animal Welfare

If applicable, Suppliers shall ensure humane treatment of animals throughout their operations and supply chains. Suppliers should implement appropriate controls to ensure animals are treated humanely, housing and care conditions meet applicable welfare standards, and unnecessary animal suffering is prevented.

## Compliance Management and Oversight

Suppliers are required to establish and maintain appropriate and robust internal policies, procedures, and oversight practices to support compliance with this SCOC. These measures must be designed to: (a) ensure alignment with the provisions of this SCOC; (b) identify and address operational, legal, ethical, environmental, and human rights–related risks arising from the Supplier’s operations; and (c) ensure compliance with all applicable laws, regulations, and relevant client requirements relating to operations and products. These measures must support ongoing improvement and, at a minimum, include the following elements:

### Organizational Commitment

Suppliers must develop, publish, monitor and adhere to comprehensive policy declarations covering human rights, workplace safety, environmental stewardship, and ethical standards. These declarations should demonstrate executive leadership endorsement of due diligence practices and continuous improvement initiatives. Such policy communications must be publicly accessible and conveyed to employees and all associated parties.

### Leadership Oversight and Governance

Suppliers shall designate and formally appoint specific senior executives and organizational representatives accountable for overseeing the implementation of management frameworks and related programs. Notwithstanding the above, top executive leadership must conduct regular reviews of the framework, effectiveness and performance.

### Regulatory and Client Compliance

Suppliers must implement systematic processes to identify, track, and comprehend applicable legal requirements, regulatory standards, and client specifications, including all provisions contained within this SCOC. Suppliers shall comply with the Mobileye Environmental, Health and Safety (EHS) Policy, as may be communicated or made available by Mobileye at <http://ir.mobileye.com/corporate-governance/governance-overview>. Suppliers shall implement and maintain appropriate policies, procedures, controls, and training to ensure alignment with such EHS Policy in connection with all work performed for or on behalf of Mobileye.

### Risk Evaluation and Control

Suppliers should establish comprehensive procedures for identifying regulatory and compliance risks across legal, environmental, health, safety, labor, and ethical domains, with particular attention to conduct, severe human rights and environmental impact risks related to their operations. Risk significance must be evaluated, and appropriate procedural and physical safeguards implemented to manage identified risks and maintain regulatory compliance. Suppliers must establish and maintain comprehensive documentation and records to demonstrate regulatory compliance and conformity with organizational requirements while ensuring appropriate confidentiality measures to protect sensitive information. Such records shall be retained for a minimum of 7 years, or for any longer period required by any applicable law.

### Performance Enhancement Goals

Suppliers must establish documented performance targets, measurable objectives, and detailed implementation strategies to advance their social, environmental, and health and safety outcomes, including regular evaluation of progress toward achieving these goals.

## Drill Down

Suppliers shall develop processes to communicate SCOC requirements to their business partners and monitor their adherence to SCOC provisions.

## Educational Programs

Suppliers shall develop comprehensive training initiatives for management and staff to execute organizational policies, procedures, and improvement targets while meeting all applicable legal and regulatory obligations.

## Remediation Procedures

Suppliers shall implement processes for prompt resolution of deficiencies identified through internal or external evaluations, inspections, investigations, and reviews.

## Reporting Misconduct and Grievance Mechanism

Suppliers shall establish and maintain accessible bidirectional mechanisms for employees, subcontractors, and other stakeholders to collect feedback, report concerns or report violations related to business ethics, human rights or the environment, including but not limited to a confidential whistleblower hotline or equivalent reporting system. Suppliers must ensure protection against retaliation for individuals who report concerns. All reports of misconduct must be promptly investigated, and Suppliers shall cooperate fully with the Company's own grievance and reporting mechanisms, including timely notification of any material violations or compliance issues.

## Human Rights Policy

Suppliers shall adhere to and comply with the Company's [Human Rights Policy](#) as published in Mobileye's public website, as may be amended from time to time. Suppliers must ensure their operations, supply chains, and business practices align with the principles and requirements set forth in such policy and shall implement appropriate measures to prevent human rights violations throughout their activities.

By signing below, we acknowledge that we have read and understood the contents of this document.

**FULL COMPANY NAME:**

Signature:

Name:

Title:

Date: