



Responsible Sourcing Policy

Overview

Nikola Corporation (herein referred to as “Nikola,” “we,” or “our”) mission is to pioneer solutions for a zero-emissions world, and we recognize that to champion this mission, we must monitor and manage the impact of the goods and services in our supply chain. We acknowledge the severe armed conflict and human rights abuse risks in the Democratic Republic of Congo and adjoining countries (the “Conflict Zone”) encircling tantalum, tin, gold, and wolframite/tungsten (“3TG”), as well as other minerals.

Nikola is committed to avoiding contributing to the human rights abuses in the Conflict Zone through our purchasing decisions and practices, as well as ensuring our supply chain prioritizes human rights, ethical operations, and environmental protection. In addition to the laws and regulations of the markets in which Nikola does business that suppliers must abide by, this Policy defines the obligations of Nikola suppliers on all material and product sourcing, including 3TG minerals and any derivatives thereof. Nikola refers to the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“OECD Due Diligence Guidance”) for alignment and compliance. All Nikola suppliers are expected to understand and abide by these standards.

Nikola Commitment

Nikola is committed to ethical, social and environmentally conscious business practices at every level of our global supply chain. Nikola monitors our supply chain to assess whether the mineral resources contained in materials or components used to manufacture our products have any harmful impacts on the environment and expects each of our suppliers to be equal partners by monitoring their own operations. If a risk is identified in the supply chain, Nikola will engage with our supplier(s) to investigate and develop a corrective action to mitigate the identified risks. If no timely corrective action is provided by the supplier, Nikola will investigate alternative sourcing options.

Nikola will conduct periodic reviews and update this Policy and our procedures to deliver continuous improvement. Nikola will engage our suppliers to receive feedback and make appropriate revisions to ensure this Policy accurately captures our intention and the ability to responsibly source materials for our products and services. Nikola is also committed to remain in compliance with Rule 13p-1 under the Securities and Exchange Act of 1934.

Supplier Requirements

Nikola requires all companies or individuals involved in Nikola's supply chain, both directly and indirectly, to conduct their global operations in a responsible manner and encourage their suppliers to implement the same principles outlined in this Policy within their own supply chain. All suppliers with whom Nikola directly engages on supply chain will be notified of this Policy. New suppliers will be notified of the Policy upon engaging with Nikola. Suppliers are obligated to review this Policy and to adhere to it.

Nikola requires that our suppliers exert best efforts to ensure that the sourcing or manufacturing of products supplied are in compliance with all applicable laws and regulations, including those relating to sanctions, export controls, anti-corruption, anti-terrorist financing, anti-money laundering and anti-proliferation financing, and are free from any human rights violations such as child labor, forced labor and slavery, direct or indirect financing of armed conflict in the Conflict Zone, or environmental degradation as specified by the principles of the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the relevant Conventions of the International Labour Organization (ILO).

Due Diligence and Increased Transparency for Raw Materials and Minerals from Conflict-Affected and High-Risk Areas

Nikola aims to achieve responsible sourcing for all parts and components within their supply chain by working with our direct suppliers to review their own downstream suppliers. To this end, Nikola implements, and expects our suppliers to implement the following, not only for the traditional conflict minerals such as 3TGs, but all minerals or materials from conflict-affected and high-risk areas, referenced in the OECD Guidance and our due diligence processes. Nikola expects our suppliers to:

- Implement a company management system to conduct due diligence in the supply chain;
- Identify and assess risks in the supply chain;
- Manage risks by implementing risk management plan, to monitor and track progress;
- Report on supply chain due diligence; and
- Report on sub-tier and raw material supply chain entities and sources used in Nikola products.

In our ongoing efforts to promote responsible sourcing of materials, we require our suppliers to align with our efforts to provide greater transparency by disclosing, as requested, information on the origins and sources of raw materials in products supplied to Nikola.