



## Lyft's Code of Business Conduct and Ethics

(As amended and restated on February 5, 2025)

As you've probably figured out, this is the official Code of Business Conduct and Ethics for Lyft, Inc. We'll call it the "Code" from now on, and refer to Lyft, Inc. (including all its subsidiaries) as simply "Lyft" or the "Company."

Grab a mug of coffee and read this entire document closely. The Code applies to all officers and employees ("Team Members") as well as our Board of Directors (the "Board").

We have created the Code in the best interest of Lyft, which includes you and other Team Members, our community of drivers and riders, and our stockholders. It is foundational to Lyft's purpose – to serve and connect – and reflects our company values. These are common-sense policies that are either required by law or intended to help Lyft comply with the law; we expect you to follow them. You could face disciplinary action if you don't, including termination of employment.

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**Executive Summary:** The Code applies to all officers, employees, and the Board of Directors. It promotes honesty, ethical conduct, and compliance with laws and regulations. Team Members must report violations promptly without fear of retaliation. The Code also covers financial reporting, conflicts of interest, corporate opportunities, protection of company assets, confidentiality, communications, fair dealing, and compliance with laws and regulations, including antitrust, health, safety, environment, fair employment practices, political activities, bribery, corruption, and insider trading. Violations may result in disciplinary action, including termination.

## **A. Purpose**

This Code is intended to ensure and promote:

1. a culture of honesty and accountability;
2. honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
3. fair and accurate books and records, including financial reporting;
4. ethical conduct and compliance with applicable laws, rules and regulations including, without limitation, full, fair, accurate, timely and understandable disclosure in reports and documents we file with or submit to the Securities and Exchange Commission (the “SEC”) and in our other public communications;
5. the prompt internal reporting of violations of this Code, as set forth in this Code, without fear of retaliation; and
6. the deterrence of wrongdoing.

This Code is a set of minimum requirements, and Lyft expects Team Members to use their own judgment at all times to follow the high ethical standards to which Lyft is committed. It is, of course, impossible to cover every situation that may come up. It’s in difficult or gray situations where our adherence to our culture and values may be tested and where our culture and values can also guide us to do what’s right. If you are unsure or this Code does not address an issue you are facing, do not hesitate to consult your manager, your People Business Partner (“PBP”), or a member of the Legal Team. In many cases, you can also consider what we call “the headline test”: if your action or decision were written about in a headline of a major newspaper or website, would it be embarrassing to you or Lyft? If so, or it’s not clear, you should not engage in the conduct.



You are expected to read the policies set forth in this Code and ensure that you understand and comply with them. Any questions about this Code or the appropriate course of conduct in a particular situation should be directed to the Legal Team, which may consult with management or the Board, as appropriate.

Team Members are required to adhere not only to this Code but also to all other applicable Lyft policies. In the event of a discrepancy between other codes, policies, and procedures of Lyft and this Code, the more stringent of the rules will apply. This Code is also not intended to conflict with the laws of any country or jurisdiction in which we operate. If you believe that compliance with this Code would interfere with your ability to comply with any law, you should contact the Legal Team for guidance.

## **B. Financial Reports and Record Keeping**

Team Members are responsible for the accurate and complete reporting of financial information within their respective areas of responsibility and for the timely notification to senior management of financial and non-financial information that may be material to Lyft. Lyft expects all of its Team Members to take this responsibility very seriously to ensure full, fair, accurate, timely and understandable disclosure in reports and documents that Lyft files with government agencies or releases to the general public.

Each Team Member, to the extent involved in Lyft's disclosure process, including without limitation, the principal executive officer, principal financial officer and other senior Team Members who perform similar functions at Lyft (collectively, "Senior Financial Officers"), must familiarize themselves with the disclosure requirements applicable to Lyft as well as the business and financial operations of Lyft, and must not knowingly misrepresent, or cause others to misrepresent, facts about Lyft to others, whether within or outside Lyft, including to Lyft's independent auditors, governmental regulators and self-regulatory organizations.

All of Lyft's books, records, accounts and financial statements must be maintained in reasonable detail, and reflect the matters to which they relate accurately, fairly and completely. Furthermore, all books, records, accounts and financial statements must conform both to applicable legal requirements and to Lyft's system of internal controls. All assets of Lyft, including, but not limited to, business data, records, and reports, must be prepared truthfully and accurately. Lyft's business records must be maintained for the periods specified in Lyft's applicable record retention policies.

No undisclosed or unrecorded account or fund will be established for any purpose. No false or misleading entries will be made in Lyft's books or records for any reason, and no disbursement of corporate funds or other corporate property will be made without adequate supporting documentation and authorization. Misclassification of transactions as to accounts, business units or accounting periods is forbidden. Each Team Member bears responsibility for ensuring that they are not party to a false or misleading accounting entry. This means we cannot make any promises that are not detailed in the documentation that has been fully reviewed by the appropriate departments. Failure to be transparent and to follow the correct approval and documentation process can cause problems for you and Lyft.

## **C. Conflicts of Interest**

A conflict of interest is any activity or interest that is inconsistent with or opposed to the best interests of Lyft. Your decision and actions in the course of employment or other relationship with Lyft



should be based on the best interests of Lyft and not based on personal relationships or benefits. You must never use or attempt to use your position with Lyft to obtain improper personal benefits. Any situation, transaction or relationship that may give rise to an actual or potential conflict of interest must be disclosed to Lyft and shall be avoided, unless approved by Lyft.

The following are some examples of conflicts of interest to be avoided:

1. Family Members

You may not conduct business on behalf of Lyft with family members or an organization with which a family member is associated, unless such business relationship has been disclosed to and authorized by Lyft and is a bona fide arms-length transaction. "Family members" include a spouse, domestic partner, parents, grandparents, children, siblings and in-laws.

2. Interests in Other Businesses

You may not accept compensation in any form for services performed for Lyft from any source other than Lyft. You should not have an undisclosed material financial interest in an actual or potential competitor, supplier, customer or business partner of Lyft. Outside employment or business activities (e.g., advisory roles) are only permissible if they do not give rise to any conflict with Lyft's business or negatively impact your ability to do your job at Lyft. If there is any question or potential for conflicts of interest, you must seek preclearance from Legal (e.g., by submitting an Outside Business Activity form or contacting the Conflicts Committee).

3. Improper Conduct and Activities

You may not engage in any conduct or activities that are inconsistent with Lyft's best interests or that materially disrupt or impair Lyft's relationship with any person or entity with which Lyft has or proposes to enter into a business or contractual relationship. Moreover, any outside employment/advisory activities are only permissible if they do not give rise to any actual conflict with Lyft's business or impact your ability to do your job at Lyft objectively and effectively. Before engaging in any outside employment/advisory activities, you must seek preclearance from Lyft's Legal Team (e.g., by submitting an Outside Business Activity form or contacting the Conflicts Committee), as well as seek approval from your manager.

4. Gifts and Gratuities

The Code does not prohibit appropriate and modest hospitality given or received in the normal course of business. However, it's important to keep in mind that gifts can be subject to limits and disclosure requirements. Moreover, you may not give or receive any gift that could be viewed as trying to affect a particular business decision. Gifts on behalf of Lyft or in your capacity as a Lyft representative should only be made in compliance with our Gifts & Entertainment Policy and you should not try to avoid our policies by giving the gift out of your own pocket. Pursuant to our Political Activities Policy, you should contact the Legal Team for approval prior to giving any gifts to government or public officials, which includes officials of public international organizations (e.g., United Nations and the World Trade Organization), to make sure they do not violate the law or our policies.



## 5. Personal Use of Company Assets and Information

You may not use Company assets, labor or information for personal use, other than incidental personal use, unless approved by the Legal Team.

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Evaluating whether a conflict of interest exists can be difficult and may involve a number of considerations. We also encourage you to seek guidance from your manager, the People Team or the Legal Team when you have any questions or doubts.

If you are aware of an actual or potential conflict of interest where your interests may conflict with Lyft's interests, or are concerned that a conflict might develop, please discuss with your manager and then, if necessary, obtain approval from the Legal Team (you should email the Conflicts Committee) before engaging in that activity or accepting something of value. Please also note that, to the extent your proposed engagement or activity could constitute a "related person transaction," it will also be addressed pursuant to our Related Person Transaction Policy and Procedures and may require approval of the Audit Committee of the Board and SEC disclosures.

### **D. Corporate Opportunities**

Team Members owe a duty to Lyft to advance Lyft's business interests when the opportunity to do so arises. You are prohibited from taking or directing to a third party to take a business opportunity that is discovered through the use of corporate property, information or position, unless Lyft has already been offered the opportunity and turned it down or otherwise consented. More generally, you are prohibited from using Lyft property, information or position for personal gain. You are further prohibited from competing with Lyft directly or indirectly. You owe a duty to Lyft to advance its legitimate interests when the opportunity to do so arises.

Sometimes the line between personal and Lyft benefits is difficult to draw, and sometimes there are both personal and Lyft benefits in certain activities. The prudent course of conduct is to make sure that any use of Company property or services that is not solely for the benefit of Lyft, is approved beforehand by Lyft.

### **E. Protection and Proper Use of Company Assets**

No secret or unrecorded fund of Company assets or cash shall be established or maintained for any purpose. Anyone spending or obligating Company funds should be certain that the transaction is properly and appropriately documented and that Lyft receives appropriate value in return.

You should endeavor to protect Lyft's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on Lyft's profitability. Any suspected incident of fraud, theft, loss or misuse should be reported immediately to your manager, the People Team, or the Legal Team. Lyft equipment should not be used for non-Company business, though incidental personal use may be permitted.



## **F. Confidentiality**

In carrying out Lyft's business, you may learn confidential, non-public trade secrets or proprietary information about Lyft, its customers, suppliers or business partners. Confidential or proprietary information of Lyft, and of other companies, includes any non-public information that would be harmful to the relevant company or useful to competitors if disclosed, including information that customers, partners or vendors have provided to Lyft.

Pursuant to this Code, Lyft's Inventions Assignment and Confidentiality Agreement, or any other confidentiality terms to which you agreed with Lyft, you must maintain the confidentiality of information about Lyft and other parties entrusted to you by Lyft, use the information only for permissible business purposes and in accordance with any restrictions imposed by the disclosing party, and limit dissemination of the confidential information, both inside and outside Lyft, to people who need to know the information for business purposes and who are bound by similar obligations of confidentiality, unless disclosure is authorized or legally mandated. Please be aware that your use of unapproved third-party tools could result in unauthorized disclosure of Lyft confidential information. Unauthorized disclosure of confidential information could be a conflict of interest, but in all cases, it is a violation of your obligations to Lyft.

The obligation to protect confidential information does not end when you terminate your relationship with Lyft. Any questions about whether information is confidential should be directed to the Legal Team.

## **G. Communications**

Clear and consistent communication is important for Lyft. We need to make careful decisions about what to say – and how – to the media and public (e.g., government officials, potential partners, etc.). All statements we make to the public should be complete, accurate and truthful, never false or misleading. Our entire community – Team Members, drivers, riders, investors and other stakeholders – deserve honesty, transparency and consistency from us, making it critical that only authorized Lyft spokespersons respond to public inquiries or speak on behalf of Lyft. If you are approached by an outside source (like a reporter) to comment on any aspect of Lyft's business, please refer them to the Communications Team or Legal Team. Please also refer to our Regulation FD and External Communications Policy.

We ask you to remember your confidentiality obligations, and please refer to the Communications Policy and Social Media Policy in our Team Member Handbook for additional guidance.

## **H. Fair Dealing**

Lyft has a history of succeeding through honest business competition. It's core to our values. Lyft does not seek competitive advantages through illegal or unethical business practices, including, without limitation, corruption, bribery, kickbacks, extortion, embezzlement, unfair competition, or other similar practices. It is not possible to provide an exhaustive list of unethical. Instead, Lyft relies on the judgment of each individual to avoid such practices. You should endeavor to deal fairly with each other and with Lyft's riders, drivers, customers, service providers, suppliers, business partners and competitors. No Team Member should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any unfair dealing practice.

## **I. Compliance with Laws, Rules & Regulations**

You must respect and obey all applicable laws when carrying out responsibilities on behalf of Lyft and refrain from illegal conduct.

You have an obligation to be knowledgeable about specific laws, rules and regulations that apply to your area of responsibility. If a law conflicts with a policy in this Code, you must comply with the law.

Any questions as to the applicability of any law should be directed to the Legal Team. The following is a brief summary of certain topics about which you should be aware:

### **1. Antitrust**

Antitrust and competition laws are designed to foster competition and prohibit activities that unreasonably restrain trade. Actions taken in combination or agreement with other companies – particularly competitors – that restrain competition may violate antitrust laws and some are presumed to be illegal regardless of any purported justification. Agreements that implicate these laws can involve topics including but not limited to (a) prices; (b) recruiting, compensation, payments or benefits to employees or independent contractors (including drivers); (c) costs; (d) output or supply; (e) bids or RFPs; (f) group boycotts; (g) allocation of customers, territories, products or services; and (h) certain operational decisions. In this context, “agreement” is broadly construed, and can be written or oral; formal or informal; or through a mutual understanding, signaling (e.g., public statements), humans or computers (like certain algorithms), or third parties. “Competitors” can also be broadly construed to include companies with which Lyft currently or even potentially competes for not only the provision of goods or services; but also in other ways, including for the acquisition of goods, services, technology, or R&D; and the hiring of employees or engagement/onboarding of independent contractors, including drivers. Certain antitrust violations, including those involving certain agreements with competitors, are criminal and can result in large fines and prison terms for the individuals involved.

Sharing information with competitors – directly or indirectly – about the topics listed above or any other competitively sensitive topics may also violate antitrust laws. In addition, actions taken by an individual company in a market segment in which it has a particularly strong position may violate antitrust laws if, for example, the actions have the effect of excluding competition through unfair means.

Lyft’s policy regarding antitrust compliance is set forth in our Antitrust Compliance Policy, which you must review and adhere to. The laws governing this area are complex, and you should reach out to the Legal Team if you have any question about whether any action may implicate these laws including but not limited to (a) communicating with a competitor; (b) discussing any of the topics listed above or any other confidential or competitively sensitive information outside Lyft; or (c) taking any other action that could be perceived as anti-competitive.

### **2. Health, Safety & Environment**

Lyft works to conduct its business activities and operations in a manner that promotes protection of people and the environment to the extent practicable. Compliance with all applicable laws, rules and regulations governing health, safety and the environment are a responsibility of management and Team Members in all functions.



### 3. Fair Employment Practices

Lyft works to maintain a work environment in which all individuals are treated with respect and dignity. Every individual has the right to work in a professional atmosphere that promotes equal employment opportunities and where discriminatory practices, including harassment, are prohibited.

Lyft requires each Team Member to treat all colleagues in a respectful manner and to forge working relationships that are uniformly free of bias, prejudice and harassment. Lyft prohibits discrimination against or harassment of any Team Member on the basis of race, religion or religious creed (including religious dress and grooming practices), color, ethnic or national origin, sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), nationality, national origin, ancestry, immigration status or citizenship, age, physical or mental disability, medical condition (including genetic information or characteristics, or those of a family member), military service or veteran status, marital status or family care status, sexual orientation, family medical leave, gender (including gender identity, gender expression, transgender status, or sexual stereotypes), political views or activity, status as a victim of domestic violence, sexual assault or stalking, or any other basis or classification protected by applicable federal, state or local law.

Any Team Member who is found to have discriminated against or harassed another Team Member is subject to discipline up to and including termination.

You will not suffer any reprisals or retaliation for making complaints about or reporting any incidents of discrimination, harassment, or perceived discrimination or harassment, or for participating in any investigation of incidents of such. Refer to the Team Member Handbook for more on what we expect of all Lyft Team Members.

### 4. Political Activities and Lobbying

Due to the nascent and rapidly evolving nature of our industry, we have a long history of interacting with politicians and regulators. Political contributions and lobbying activities are highly regulated and, in some cases, subject to disclosure and reporting requirements, and are often limited – or even prohibited – from certain sources. Lyft's policy regarding political activities and lobbying is set forth in our Political Activities Policy and, to the extent you are engaging in activities on behalf of, or as a representative of Lyft, you must adhere to the policy.

### 5. Bribery and Corruption

You may only transact business on behalf of Lyft in foreign markets and with foreign government officials in accordance with Lyft's Global Anti-Bribery and Anti-Corruption Policy and/or any applicable law, including the United States Foreign Corrupt Practices Act (the "FCPA"), the United States Travel Act, and other applicable domestic and international anti-corruption laws. You must never engage in any bribery, kickbacks or other types of corruption when dealing with government officials, customers, suppliers or other third parties regardless of local practices or competitive intensity. Specifically, you must never directly or indirectly via a third party make, offer, or authorize a payment (including cash or any other items of value such as meals, gifts, travel, entertainment, etc.) to an official of any government or any private sector company to corruptly influence that person, obtain or retain business for Lyft, or to acquire any improper advantage without written pre-approval by the Legal Team.





If you are unaware of the legal rules involving these activities, you should consult with the Legal Team before taking any such action. For more information about the FCPA and the rules governing providing things of value to foreign officials, please contact the Legal Team.

#### 6. Insider Trading

Under U.S. federal and state securities laws and under the laws of other jurisdictions in which we operate, it is illegal to trade in the securities of a company while in possession of material non-public information about that company. Because you will have knowledge of specific confidential information that is not disclosed outside of Lyft which will constitute material non-public information, trading in Lyft securities or in the securities of companies on the basis of material non-public information you learn through your service with Lyft could constitute insider trading and could violate the law, as could giving material non-public information to others who trade on that information.

It is your responsibility to comply with these laws and not to share material non-public information outside of Lyft or with others who are not subject to confidentiality obligations. We have also adopted an Insider Trading Policy with which you must comply. For more information about insider trading laws, including a definition and examples of material non-public information, please reference our Insider Trading Policy.

### J. **Compliance & Reporting**

#### 1. Seeking Guidance

You are encouraged to seek guidance from managers, the People Team or the Legal Team, or other appropriate Company personnel when in doubt about the best course of action to take in a particular situation. In most instances, questions regarding this Code should be brought to the attention of the Legal Team.

#### 2. Reporting Violations

If you know of or suspect a violation of this Code, or of applicable laws and regulations (including complaints or concerns about accounting, internal accounting controls or auditing matters), or you have concern about a situation that you believe does not reflect our culture and values, you must promptly voice your concerns to your manager or a member of an appropriate team, including Internal Audit, People Team, Environment, Health & Safety, or Legal Team. Failure to report a known violation allows misconduct to go unremedied and may be grounds for discipline. You may also report concerns via our confidential and independent Ethics & Compliance Hotline (<https://lyft.ethicspoint.com>) which, in the U.S. and in other jurisdictions where legally permitted, can be submitted anonymously. **Please see the Whistleblower Policy for information about making anonymous reports.**

All reports will be kept confidential, to the extent practical, and such determination will be made on a case-by-case basis. Nothing in this Code is intended to curtail Team Member rights under the law to discuss work-related matters, such as terms and conditions of employment, wages and other work-related matters.



### 3. No Retaliation for Reports Made in Good Faith

Lyft does not permit retaliation of any kind for good faith reports of violations or possible violations. Retaliation for reporting a federal offense is illegal under federal law and prohibited under this Code. Such retaliation may result in discipline, up to and including termination of employment and may also result in criminal prosecution. A Team Member who makes a report in good faith is protected from retaliation even if the investigator does not agree that there has been a violation. However, if the Team Member making the report was involved in improper activity, the fact that he or she reported it will not necessarily prevent him or her from being disciplined for his or her participation in the violation. In these circumstances, Lyft may consider the Team Member's conduct in promptly reporting the information as a mitigating factor in any disciplinary decision.

### 4. Investigations

Reported violations will be promptly and thoroughly investigated by designated personnel. Team Members, including managers, must not conduct an investigation on their own and instead should report their concerns through the proper channels to be investigated pursuant to Lyft policies. You are expected to cooperate fully with any appropriately authorized investigation, whether internal or external, into reported violations. You should never withhold, tamper with or fail to communicate relevant information in connection with an appropriately authorized investigation. Lyft's Whistleblower Policy also prohibits retaliation against any individual who participates in an investigation.

In addition, you are expected to maintain and safeguard the confidentiality of an investigation to the extent possible, except as otherwise provided in this Code or by applicable law. Making false statements to or otherwise misleading internal or external auditors, investigators, legal counsel, Lyft representatives, regulators or other governmental entities may be grounds for immediate termination of employment or other relationship with Lyft and also be a criminal act that can result in severe penalties.

### 5. Violations

Violations of this Code may result in disciplinary action, up to and including termination. Moreover, Team Members who direct or approve of any conduct in violation of this Code, or who have knowledge of such conduct but do not immediately report it may also be subject to disciplinary action, up to and including termination of employment. A member of the Board who violates this Code or directs or approves conduct in violation of this Code shall be subject to action as determined by the Board.

Furthermore, violations of some provisions of this Code are illegal and may subject you to civil and criminal liability.

### 6. Disclosure

Nothing contained in this Code or any other Company agreement or policy is intended to prohibit or restrict you from disclosing confidential information to any government, regulatory or self-regulatory agency including under Section 21F of the Securities and Exchange Act of 1934, as amended, and the rules thereunder.

**K. Accountability for Adherence to this Code**

The Board shall determine, or designate appropriate persons to determine, appropriate actions to be taken in the event of violations of this Code. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to this Code, and shall include written notices to the individual involved that the Board or its designee has determined that there has been a violation, and may include disciplinary action, up to and including termination of the individual's employment or other service. Any determination as to potential violations of this Code by officers or directors of Lyft may be made only by the Board.

**L. Waivers of this Code**

Any amendment or waiver of any provision of this Code must be approved in writing by the Board or, if appropriate, its delegate(s), and promptly disclosed pursuant to applicable laws and regulations. Any waiver or modification of this Code for a Senior Financial Officer will be promptly disclosed to stockholders if and as required by applicable law or the rules of the applicable stock exchange.

**M. Amendment**

Lyft is continuously reviewing and updating its policies, and therefore reserves the right to amend this Code at any time for any reason.