



Policy: Conflict of Interest

Revision Level /Date: Rev. 0- 01/31/2023

Department: Legal

Page 1 of 2

REVISION HISTORY

REVISION LEVEL/DATE	DESCRIPTION
Rev. 0- 01/31/2023	Initial Release

I. Purpose and Scope

Workhorse Group Inc. and all of its subsidiaries (collectively, the “Company”) is committed to achieving the highest standards of professionalism and ethical conduct in its operations and activities. Integrity is one of the Company’s core values- the Company is committed to consistently choosing the “harder right” by being honest and demonstrating an uncompromising adherence to strong, moral, ethical principles and values, and expects its employees, directors, officers, and independent contractors (collectively, “Employees”) to uphold this standard.

This policy is intended to increase awareness of potential conflicts of interest and establish a procedure for reporting them.

II. Conflict of Interest

Employees should always act in the best interest of the Company and not permit outside interests to interfere with their job duties. The Company prohibits all Employees from using their position with the Company or the Company's relationship with its clients, customers, vendors, suppliers, and/or contractors for private gain or to obtain benefits for themselves or members of their family.

For purposes of this policy, a potential conflict of interest occurs when an Employee's outside interests (for example, financial or personal interests) interfere with the Company's interests or the Employee's work-related duties. For example, a conflict of interest can occur when an Employee is in a position to influence a decision that may result in a personal gain for the Employee or the Employee's family member as a result of the Company's business dealings.

If you have a question about whether a situation is a potential conflict of interest, please contact the General Counsel.

Favors and Gifts Business decisions should be made in the best interests of the Company. The Company prohibits Employees from seeking or accepting any gifts, favors, entertainment, payment, or loans for themselves or their family members from any client, customer, vendor, supplier, contractor, or other party doing business with the Company except for gifts of less than \$100.00 or tickets to an event if prior approval is obtained from the Legal Department. Cash should never be accepted.

The Company also prohibits Employees from giving any gifts or favors to any client, customer, vendor, supplier, contractor, or other party doing business with the Company except for gifts of less than \$100.00 without prior

	Policy: Conflict of Interest
	Revision Level /Date: Rev. 0- 01/31/2023
	Department: Legal
	Page 2 of 2

approval from a supervisor. Cash gifts should never be made. Employees who wish to provide tickets to potential or actual clients or customers should obtain prior approval from the Legal Department.

If an Employee violates this policy, the Company will take prompt corrective action, including discipline, if appropriate.

III. Reporting Procedure

If you become aware of any potential conflict of interest or ethical concern regarding your employment or another Employee at the Company, you must promptly speak to, write, or otherwise contact your direct supervisor or, if the conduct involves your direct supervisor, contact the Chief Compliance Officer or reach out anonymously via our Whistleblower Hotline as soon as possible. You should be as detailed as possible. The Company will directly and thoroughly investigate all concerns regarding conflicts of interest. The Company will determine whether a conflict of interest exists and what action should be taken.

The Company does not tolerate any form of discipline, reprisal, intimidation, or retaliation against Employees who report a potential conflict of interest or violation of this policy.

For further details regarding reporting violations of this policy, please see our Whistleblower Policy.