

Lucid Reality Labs Anti-Corruption Policy

At Lucid Reality Labs, we are committed to the highest standards of integrity. We take pride in what we create and in the ethical way we conduct business. Globally, we adhere to ethical practices, ensuring our records are always accurate and transparent. We have zero tolerance for corruption, including bribery, kickbacks, or illicit payments, whether directly or through third parties. We fully comply with anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), in every region where we operate.

Purpose

To prevent the offering, paying, soliciting, or accepting of bribes or kickbacks worldwide and to promote Lucid Reality Labs' commitment to compliance with global Anti-Corruption Laws, including the U.S. Foreign Corrupt Practices Act (FCPA).

Lucid Reality Labs Personnel: Members of the Board of Directors, officers, employees, and contingent workers (including vendor workers, contractors, and consultants).

Definitions

Government Official: Any officer, employee, or person acting for or on behalf of a government or any government department, agency, or state-owned or state-controlled entity, or public international organization; political parties and officials of political parties; any candidate for political office.

Anything of Value: Broadly construed as anything that a recipient may consider valuable to them. This includes cash and non-cash gifts and benefits, both tangible and intangible, such as discounts, rebates, gifts, entertainment, meals, travel, conference attendance fees, or ad credits.

Third Party: Any person not employed by Lucid Reality Labs or any business or organization not owned or controlled by Lucid Reality Labs.

Scope and Applicability

All Lucid Reality Labs Personnel and Third Parties acting on Lucid Reality Labs' behalf must adhere to this Policy and the principles underlying this Policy in any of their activities related to their work with Lucid Reality Labs.

Requirements

01 NO BRIBES OR KICKBACKS

Bribery is the improper offer, promise, giving, or authorizing the giving of Anything of Value to any person to get or keep business, secure an improper advantage, or influence them to act improperly. Lucid Reality Labs does not bribe or condone bribery in any situation, including public sector and commercial bribery. All Personnel are prohibited from offering, paying, soliciting, reimbursing, or accepting any bribe, kickback, or improper payment.

02 ENGAGE ETHICALLY WITH GOVERNMENT ENTITIES AND OFFICIALS

Engaging with governments and political entities must be constructive, ethical, and responsible. Advance approval from Compliance is required before providing Anything of Value to a Government Official. This includes political contributions, event sponsorships, hiring decisions, and facilitating payments.

03 FOLLOW LUCID REALITY LABS' RULES ON GIFTS AND BUSINESS HOSPITALITY

Lucid Reality Labs responsibly invests in business relationships but never offers or accepts Anything of Value to improperly influence people or under circumstances that might give rise to even an appearance of impropriety. Personnel must consult and comply with the company's guidelines before giving or receiving gifts, meals, entertainment, or travel.

04 WORK RESPONSIBLY WITH ETHICAL AND QUALIFIED THIRD PARTIES

Lucid Reality Labs works with Third Parties that are qualified, act with ethics and integrity, and comply with local law. Follow the company's Third Party Risk Management procedures for all third-party engagements, ensuring necessary diligence and oversight.

05 IDENTIFY AND ADDRESS "RED FLAGS"

Ignoring signs of bribery can lead to legal liability. Personnel are expected to refer any suspicious matter to Compliance for review and guidance.

06 CREATE AND MAINTAIN ACCURATE BUSINESS RECORDS AND EFFECTIVE INTERNAL CONTROLS

All business records must reflect the underlying transaction or event accurately. Contracts must include accurate details of the agreement, and all expenditures must be correctly documented. Personnel must ensure compliance with internal controls to prevent corruption and maintain accurate records.

07 CONDUCT RISK-BASED DUE DILIGENCE IN CONNECTION WITH ACQUISITIONS AND JOINT VENTURES

Before participating in joint ventures or similar business arrangements or acquiring any companies, appropriate due diligence must be conducted, ensuring oversight and compliance with this Policy.

Violations

A violation of this Policy or law may result in disciplinary action up to and including termination of employment or removal from the company's account for contingent workers. Violators can also subject themselves and Lucid Reality Labs to civil and criminal penalties.

Reporting Concerns or Violations

All known or suspected violations of this Policy must be reported without delay to Compliance, Internal Audit, or through the Whistleblower and Complaint Policy.

Anonymous reporting is available via a designated hotline or online platform.

Modifications

The Audit and Risk Oversight Committee will review this Policy regularly, evaluate its effectiveness, and update or amend it as necessary. Administrative changes may be approved by the Chief Legal Officer or their designee.