



Via Transportation, Inc.

## Code of Business Conduct & Ethics

Adopted on: March 6, 2023

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### The A to V of Via: Our Code of Conduct & Ethics

In this Code of Business Conduct & Ethics, we've outlined the principles we believe every member of the Via Team should embody in their day to day to put Via's values into practice. By putting our values at the forefront of our work and decision-making, we ensure that we're conducting ourselves in a way that helps us achieve our mission. Our commitment to the Code allows us to attract amazing talent and to build game-changing products.

This Code applies to every member of the Via Team. That means all employees, officers, and members of the Board of Directors — regardless of where in the world they may live and work — must comply with the Code. All of our independent contractors, vendors, and consultants must review and comply with the Code as well.

While the Code addresses a wide range of topics, we can't cover every scenario you'll encounter. We hire incredibly smart and capable people here at Via and we trust you to use your best judgment. We expect you to always act with honesty and integrity and uphold our values by treating everyone with respect when you represent Via. Even if you're considering doing something that is perfectly legal, if you're not sure that it reflects our principles — or if you think it would be embarrassing or harmful to the company or our partners — don't do it.

The Code doesn't exist in isolation; it should be read in conjunction with all other policies that may apply to you. While some of these policies are required by law, many are just plain common sense. Please remember that failure to abide by the Code may lead to disciplinary action, or even termination of your relationship with the company. This means

that you should ask your manager or the Legal Team ([compliance@ridewithvia.com](mailto:compliance@ridewithvia.com)) if you have any questions about the Code or how it would apply to any particular situation you are facing.

## Our Mission

At Via, we are driven by a simple mission: to create public transportation systems that provide far greater access to jobs, healthcare, and education. By leveraging data and technology, we can create smarter transit networks that are able to deliver greater value and access to opportunity for the communities we serve.

## Our Values

- **Smart:** We want to get people where they need to go using the most efficient means possible, whether it's via (pun intended) the quickest route or using the fewest vehicles.
- **Human:** We're more than just our technology - we're building a movement around sustainable transportation, and that means from our comms to our contracts — we put people first.
- **Shared:** We think about the collective community and our partners, and we value extreme kindness and transparency. We also really like shared rides — it's kind of our thing.

These values should always be at the center of our work and the relationships we establish. We use our smarts to build accessible, inclusive, and safe products and services. We put humans first and we do right by our employees, partners, and the riders and drivers using our platform. And we are all about sharing — from shared mobility to sharing best practices with our partners — we put the best interests of our stakeholders first in all that we do.

**Accessibility:** We are committed to expanding access to transit users from all financial situations, accessibility needs, and geographies. We are committed to ensuring that *everyone* can access Via's products and services.

**Commitment to our Community:** We engage with local stakeholders wherever we work, which helps us build solutions for the widest spectrum of users and riders. We give back to our communities through volunteer actions and charitable contributions.

**Trust & Safety:** The safety and well-being of our users and the general public is always top of mind. We design safe products and processes, and we ensure that we work only with trusted and vetted partners and vendors.

**Responsiveness:** We respond to user concerns whenever we hear about them. We believe it is our responsibility to get it right when it comes to all communications with employees, partners, and the riders and drivers using our platform — whether questions, issues, or kudos. If there is a problem, we solve it.

**Focus on Exceptionalism:** From our hiring to our operations, we care deeply about finding the very best outcome and delivering the highest quality of service for our partners, the riders and drivers using our platform, and investors.

## Compliance with the Law

This goes without saying, but everyone on the Via Team must obey all laws, rules, and regulations that apply to us. No exceptions.

These may include, but are by no means limited to, laws governing antitrust and competition, employee and public health and safety, the environment, employment and labor, lobbying and government relations, insider trading, data privacy and security, anti-corruption, sanctions, trade, procurement, and a wide range of laws, rules, and regulations applicable to each of the industries in which Via operates.

Remember that the law might not be intuitive, and may vary state to state or country to country. That means that you should know enough about the laws that apply to your area of responsibility to spot potential issues and identify situations where you need to ask for more information.

## Conflicts of Interest

We should avoid situations that can create conflicting loyalties, or the perception of conflicting loyalties, between personal interests and Via's interests.

There are a wide range of situations that could be or be perceived as conflicts. Some examples include:

- Influencing any Via decision in which you or a family member has a personal interest
- Having a financial relationship with one of Via's business partners or competitors which impairs, or might appear to impair, your independence or judgment
- Personal use of Via assets, including any confidential company information
- Soliciting, accepting or giving gifts which are not permitted by the Anti-Bribery and Anti-Corruption (ABC) Policy
- Any conduct that is inconsistent with Via's best interests or which usurps or disrupts its business opportunities

## Corporate Opportunities

You may not use corporate property or information, or your position with Via, for improper personal gain. And you can't compete with Via. If you learn of a business or investment opportunity through your use of Via's property or information, or your position with Via, you are prohibited from taking the opportunity or investment for yourself or directing any other person or company to do so without prior approval from our Chief Legal Officer or Chief Financial Officer.

## Confidentiality

Our love of sharing ends when it comes to confidential information. When you receive access to confidential information through your role at Via, you must make sure to keep it confidential.

We entrust you with important confidential information about Via, our partners and vendors, and the users who rely on our products and services. We do so under the terms of this Code and any other confidentiality terms you agree to in your agreement(s) with Via.

You must use confidential information only for permissible business purposes and consistent with any restrictions imposed by the party that disclosed it. You must only share confidential information with people who have a need to know it and who are also bound by confidentiality obligations.

Remember that you must protect confidential information even after ending your relationship with Via.

## Protecting Via's Assets and Security

Confidential information isn't the only type of asset that you may access as a member of Team Via. You may also receive or have an opportunity to use Via's equipment, software, accounts, or supplies. You should protect those assets and ensure that you do not use Via supplies wastefully. If you suspect fraud or theft of any physical asset, please report it to your supervisor immediately. Note that Via reserves the right to access Via-issued equipment in connection with an investigation or as required by law.

You should take care to keep your accounts and any information you may access safe and secure. Do not access information about customers or users except as necessary to fulfill your duties to Via. Our Security Team is always hard at work protecting our systems, but please stay vigilant and report any suspicious activity to them immediately.

## Reporting and Communicating Information about Via

Any information in documents and reports filed with regulatory authorities and reported to the public must be disclosed in a manner that is full, fair, accurate, timely and understandable.

**Recordkeeping:** To make full, fair, accurate, timely, and understandable disclosures to regulatory authorities, we must first ensure that our books and records are maintained transparently, accurately, and in reasonable detail. You must follow the approval and documentation processes required for your role. You are responsible for avoiding any

misleading reports of your activities and expenses, and for reporting them to your supervisor if you become aware of inaccuracies.

**Disclosures:** You must not knowingly misrepresent or omit (or cause others to misrepresent or omit) any material facts about Via to anyone — and especially not to investors, regulators, or government authorities.

**Communications:** We must speak with a clear and consistent voice. This means that only authorized spokespersons can respond to public inquiries and speak on behalf of the company. If a journalist or any other member of the media reaches out to you with a question, please do not respond to these inquiries without first checking with the Marketing or Corporate Communications Team. If you use social media to communicate about Via, please refer to the [Social Media Guidelines](#) for additional guidance. And remember: any of your communications within Via or with others might become public at some point, so be thoughtful about what you write. If you wouldn't want your grandma to read it, or you think you or the company would be embarrassed to find it going viral, don't post it.

## Competition & Fair Dealing

Anti-competitive behavior doesn't fly at a company built on sharing. We always compete fairly and honestly with others. This means that we don't seek unfair advantages over our competitors through manipulation, concealing information, misrepresentations, or by taking advantage of wrongfully disclosed or acquired information. We also endeavor to always deal fairly with our business partners, customers, and vendors.

## Anti-Corruption

We are committed to conducting our business in accordance with the highest ethical standards. We don't give anything of value to government officials or private parties in order to improperly receive business deals or gain any type of unfair advantage. This applies in both the United States and any other country in which we operate or seek to market our products. The [Anti-Bribery and Anti-Corruption \(ABC\) Policy](#) provides more details about how we avoid corruption or even the appearance of corruption, and outlines the requirements for giving and receiving gifts, travel or entertainment.

## Discrimination & Harassment

Putting humans first means everyone on Team Via is expected to treat one another with kindness, compassion, and respect. We prohibit, and have zero tolerance for, discrimination or harassment against any employee on the basis of race, religion, color, sex, pregnancy, national origin, age, physical or mental disability, military or covered-veteran status, marital status, sexual orientation, family medical leave, gender identity or gender expression, or any other classification protected by applicable federal, state or local law. Any employee, contractor, or consultant found to have engaged in harassment or discrimination may be subject to discipline, up to and including termination.

## Human Rights

We are committed to upholding and promoting human rights. We do not use or condone the use of human trafficking, slave labor, or degrading treatment of anyone, anywhere. Please review our [Anti-Human Trafficking Policy](#) for more information.

## Charity & Community Engagement

We act on our values by contributing to charity and volunteering in our communities, and we encourage team members to do so, too. We will make clear distinctions between your personal community activities and company-sponsored projects. When you do pursue community activities on your own time and with your own resources, please do not imply that you are representing Via as a company.

## Compliance

Via will investigate violations of this Code or policies referenced in it and any laws, rules, or regulations that may be implicated. In addition, because some of the things we prohibit are also violations of law, you may be subject to investigation or charges by authorities outside of the company. We require you to cooperate fully with any investigation into violations, regardless of whether they are conducted internally or by authorized outside parties. If you make false statements or mislead investigators or counsel, this may be grounds for

discipline, up to and including termination, and could also be a legal violation that would subject you to civil or criminal penalties.

## Raising a Concern

You are responsible for promptly reporting any violation of a law, regulation, or this Code. You can report any violation to your manager or the Legal Team, or you may use the procedures laid out in the [Whistleblower Policy](#) for anonymous reporting of complaints. Via strictly prohibits any retaliation against employees here at Via who in good faith report or participate in any investigation of a possible violation of our Code, policies, or the law. If you believe you are being retaliated against, please contact the People Operations Team.

## Waivers & Amendments

Any waiver of this Code or the policies referenced in it can only be issued by Via's Board of Directors or a committee of the Board. It will be promptly disclosed as required by law and rules governing the relevant stock exchanges.

We are constantly monitoring and updating our policies, so we reserve the right to amend this Code at any time and for any reason.

## Related Policies

This Code references a number of other policies which govern your relationship with Via. There may be others, too, depending on the specifics of your role. For example, if you are an employee, you may be subject to additional restrictions in your employment agreement and handbook; if you are a driver partner, you may also be required to adhere to specific zero tolerance and anti-discrimination policies; and if you are employed by a client, you may be required to accept specific terms of use governing our platform and software. We ask that you continually reference both this Code and the other policies and rules applicable to your actions and relationship with Via in order to ensure that you are always promoting our shared values and principles.