



BE IT RESOLVED: Shareholders request the Board of Directors adopt a comprehensive Human Rights Policy which states the Company’s commitment to respect human rights as outlined in the United Nations Guiding Principles (“Guiding Principles”) and the International Labour Organization (“ILO”) Declaration on Fundamental Principles (“Fundamental Principles”) throughout its operations and value chain, and describes steps to identify, assess, prevent, mitigate, and, where appropriate, remedy adverse human rights impacts connected to the business.

SUPPORTING STATEMENT: Rivian Automotive Inc. (“Rivian”) lacks an overarching policy that uniformly commits to upholding international human rights standards and frameworks throughout its activities. While its Supplier Code of Conduct states expectations for suppliers to uphold international human rights standards,¹ Rivian does not publicly make such a commitment in its own operations. Rivian’s Code of Business Conduct states: “We respect the human rights and dignity of people throughout our operations and our global supply chain,” and pledges to comply with local laws.² However, the Company does not state it will adhere to the often-higher standards set by the United Nations and ILO. It also does not include comprehensive due diligence, mitigation, and remediation processes as outlined in the Guiding Principles.³

The Fundamental Principles include: freedom of association and collective bargaining rights; the abolition of forced and child labor; the elimination of workplace discrimination; and a safe and healthy working environment.⁴ Freedom of association and collective bargaining can enhance shareholder value by improving health and safety;⁵ encouraging workforce training and skills development;⁶ increasing productivity;⁷ promoting diversity, equity, and inclusion;⁸ and strengthening human rights due diligence.⁹ Addressing labor relations and labor rights is also proposed by the

¹

<https://assets.rivian.com/2md5qhoeajym/5PEdyH1PnC3iEllseM49oY/060ec197886709bad62557bda70a618e/Rivian-Supplier-Code-of-Conduct.pdf>

²

<https://assets.rivian.com/2md5qhoeajym/4B3osmVGC8h4XEKQmaGour/2f93710a01fb2b85433844705e2b1066/Rivian-Code-of-Business-Conduct-and-Ethics.pdf>, p.35

³ https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf

⁴ https://www.ilo.org/dyn/normlex/en/f?p=1000:62:0::NO:62:P62_LIST_ENTRIE_ID:2453911:NO

⁵ <http://oem.bmj.com/content/early/2018/06/13/oemed-2017-104747>

⁶ https://www.oecd-ilibrary.org/employment/negotiating-our-way-up_1fd2da34-en

⁷ <https://doi.org/10.1093/ej/ueaa048> ; <https://www.ipa-involve.com/involvement-and-productivity-the-missing-piece-of-the-puzzle>

⁸ <https://hummedia.manchester.ac.uk/institutes/code/research/projects/racism-at-work/tuc-report-executive-summary.pdf> ; <https://www.epi.org/publication/unions-help-reduce-disparities-and-strengthen-our-democracy/>

⁹ https://www.theglobaldeal.com/resources/The%20Business%20Case%20for%20Social%20Dialogue_FINAL.pdf



UN Principles for Responsible Investment for investors to mitigate the systemic risk of inequality.¹⁰

However, there are indications that Rivian’s practices do not fully align with the Fundamental Principles. The National Labor Relations Board is currently investigating charges that Rivian threatened and retaliated against workers attempting to exercise freedom of association rights and trying to unionize.¹¹ Over a dozen Rivian workers have also filed complaints with federal regulators about safety violations.¹² The complaints detail serious injuries that have occurred and allege Rivian ignores known hazards and deprioritizes safety resources.¹³

Allegations of human rights violations in Rivian’s operations jeopardize its brand and risk legal and regulatory ramifications. A strong human rights policy signals that Rivian takes these violations seriously. Furthermore, such a policy is critical given Rivian’s global expansion plans and the known forced and child labor risks in the electric vehicle supply chain.

The transition to a low-carbon future cannot come at the expense of workers’ rights. Greater transparency on these issues would support the Company’s reputation, clarify its commitment to human rights, enable investors to perform their own due diligence, and help protect long-term shareholder value.

¹⁰ <https://www.unpri.org/download?ac=5599>

¹¹ <https://www.nlr.gov/case/25-CA-305293>

¹² <https://www.yahoo.com/video/rivian-under-scrutiny-employees-allege-184027923.html>

¹³

https://www.osha.gov/ords/imis/establishment.search?p_logger=1&establishment=Rivian&State=all&officetype=all&Office=all&sitezip=&p_case=all&p_violations_exist=all&startmonth=12&startday=14&startyear=2017&endmonth=12&endday=14&endyear=2022