

HUMAN RIGHTS POLICY

Ideanomics and its subsidiaries and divisions (“Ideanomics”) are committed to protecting the rights of people where we operate and ensure they are treated with dignity and respect. Our human rights policy follows applicable laws and is guided by the United Nations Global Compact and the International Labor Organization (ILO).

Being good stewards of our planet starts with how we treat others. We believe in applying the highest human rights, ethical standards when engaging with our employees, communities, suppliers, and partners as these relationships are critical to the long-term success of our company. And we expect our employees and partners to conduct themselves in accordance with Ideanomics’ policies defined in our [Code of Conduct](#).

Ideanomics Board of Directors has oversight responsibility and the ESG Task Force is responsible for the ongoing administration of this Policy. We are also committed to engaging with stakeholders in communities where we operate to ensure that we are taking into account their views and are up to date with local laws and regulations. All Ideanomics employees are provided with this policy’s requirements in conjunction with our Code of Conduct training.

Equal Opportunity

It is the policy of Ideanomics to provide equal employment opportunities to all employees and employment applicants without regard to unlawful considerations of race, religion, creed, color national origin (including ancestry), alienage or citizenship status, gender, pregnancy, sexual orientation (including actual or perceived sexual orientation), gender identity or expression, age, physical or mental disability, predisposing genetic characteristic, marital status, familial status, military status, domestic violence victim status, caregiver status, sexual and reproductive health decisions, or any other classification protected by applicable local, state or federal laws (“Protected Characteristics”). This policy demonstrates our commitment to protecting the rights of women and minority groups by prohibiting unlawful discrimination based on the perception that anyone has those Protected



Characteristics or is associated with a person who has or is perceived as having any of those Protected Characteristics. This policy applies to all aspects of employment, including, but not limited to, hiring, job assignment, working conditions, compensation, promotion, benefits, scheduling, training, discipline, and termination.

Child Labor

Ideanomics is committed to the prohibition of child labor. We require that all employees of Ideanomics are of the appropriate age as defined by local and national laws. Ideanomics will not knowingly engage with a supplier or distributor or enter into a joint venture with an organization that, directly or indirectly, employs child labor.

Forced Labor

Ideanomics is committed to the prohibition of all forms of forced labor including prison labor, indentured labor, bonded labor, military labor and slave labor, and any form of human trafficking. In addition, Ideanomics will not knowingly engage with a supplier or distributor or enter into a joint venture with an organization that, directly or indirectly, employs forced labor or employs persons who were trafficked into employment. Where applicable, migrant workers will have the same entitlements as local employees and best practices and local laws will be applied.

We believe our employees' work is voluntary, conducted only through freely agreed upon and documented employment terms, and paid in accordance with all applicable laws and regulations. Our employees have the right to freely terminate employment in accordance with applicable laws and regulations without fear of physical, psychological, sexual, or verbal abuse. Ideanomics employees are not required to lodge deposits of identity papers, including passports or work permits. Recruitment fees may not be charged to workers or potential workers.

Freedom of Association and Collective Bargaining

Ideanomics employees are permitted to exercise freedom of association. We respect our employees' right to join labor organizations and the freedom to collective bargaining without coercion, interference, retaliation, or harassment, in compliance with all applicable laws.



Employment Standards, Compensation, and Working Conditions

We believe that we comply with all applicable wage and hour laws and regulations. We strive to provide a broad range of employee benefits, beyond what is legally mandated, and encourage our partners to do the same. Our disciplinary procedures currently follow all applicable regulations and are documented in our Employee Handbook; all employees confirm receipt of that Handbook upon hire.

Health and Safety

We are committed to providing safe, secure working conditions and workplaces that promote health and well-being. For employees who work remotely full-time, Ideanomics provides a one-time stipend for home-office equipment. We are also dedicated to maintaining a productive workplace by minimizing the risk of accidents, injury, and exposure to health risks. We engage with employees to continuously improve both physical and mental health and safety.

As a part of our commitment to a safe and healthy working environment, we expect our employees and business partners to provide a safe business environment and conduct business in a manner consistent with applicable safety standards, including country and local requirements and facility-specific safety requirements. Employees and business partners are also expected to conduct operations in a manner that are consistent with environmental permitting, laws, and regulations in the jurisdictions in which they operate or work. Additionally, Ideanomics believes the right to water is a fundamental human right.

Anti-Discrimination

This policy applies to all Ideanomics employees as well as all independent contractors. We are committed to maintaining a work environment that is free from discrimination, harassment, and retaliation by any (1) employee, including any co-workers, managers, supervisors, or interns and regardless of an employee's immigration status; and (2) non-employees, including any contractors, vendors, customers, agents or visitors of Ideanomics. Towards that end, we will discipline any employee we find has violated this Policy, up to and including termination of employment, and we will take all other necessary and appropriate action to address any violation of this policy by a non-employee.



Communities

Ideanomics is committed to local and global community engagement. We do this by involvement in community organizations, donating to charities, and membership of strategic stakeholder organizations. We also encourage our employees to participate through our volunteering program and charity-matching benefit.

Reporting

Employees can ask questions or report suspected wrongdoing to managers or human resources. They can also submit reports anonymously through Ideanomics' confidential secure hotline: 877-763-2308 or through the website:

<https://www.whistleblowerservices.com/ideanomics>

All allegations and questions received on the hotline are reviewed by our legal team. Each investigation and inquiry is documented and reported to management for ongoing monitoring and any necessary remedial actions.

Ideanomics does not tolerate retaliation against any of its employees for raising questions or reporting suspected improper behavior. If management determines that any employee has engaged in retaliation, and in the case of an employee with managerial or supervisory responsibilities, if he or she knowingly allowed such conduct to occur and/or failed to report such conduct, management will take disciplinary action against such individual, up to and including termination of employment. Further, Ideanomics recognizes that false accusations may have serious effects on innocent persons. While the protection against retaliation will apply where an employee makes a good faith complaint of wrongdoing (even if the conduct complained of does not ultimately rise to the level which violates the law), the protection against retaliation does not apply where, after investigation, it is clear that a person intentionally made a false accusation. Where management determines that an employee made an intentionally false accusation, Ideanomics will subject the employee to appropriate discipline, up to and including termination of employment.

Adopted June 2022