

REGULATION FD POLICY

PURPOSE

Firefly Aerospace Inc. (the “**Company**”) is committed to providing fair disclosure of material information about the Company without advantage to any particular securityholder, analyst or potential investor consistent with the Securities and Exchange Commission’s Regulation Fair Disclosure (“**Regulation FD**”). Regulation FD prohibits the selective disclosure of material nonpublic information to certain enumerated persons. The regulation is intended to eliminate situations where a company may disclose important nonpublic information to certain enumerated persons before disclosing the information to the general public.

This Regulation FD Policy (this “**Policy**”) applies to all directors, officers, employees, and independent contractors and consultants of the Company and its subsidiaries.

AUTHORIZED SPOKESPERSONS

The only persons authorized to speak on behalf of the Company to Enumerated Persons (as defined below) are the Company’s Chief Executive Officer, Chief Financial Officer, and Investor Relations department representatives (each an “**Authorized Spokesperson**”).

To the extent practicable, Authorized Spokespersons should contact an appropriate person in the Investor Relations and Legal Departments before communicating with any Enumerated Person in order to review as much of the substance of the intended communication as possible, including slides and other prepared materials. In addition, to the extent practicable, all Authorized Spokespersons (other than Authorized Spokespersons who are representatives of the Investor Relations Department) should be accompanied by a representative of the Investor Relations Department during such communications, and in the case of an Authorized Spokesperson who is a representative of the Investor Relations Department, a second Authorized Spokesperson or member of the Investor Relations Department.

An Authorized Spokesperson may designate others in writing to speak on behalf of the Company or speak with respect to particular topics or specific inquiries when necessary, and any such designee must comply with the accompaniment requirement described above. If an Authorized Spokesperson does designate another to speak on behalf of such person, it is essential that the Investor Relations and the Legal Departments be aware of the information being disseminated.

ENUMERATED PERSONS

Regulation FD prohibits selective disclosure to certain specified persons, including (a) broker-dealers and persons associated with them, including investment analysts; (b) investment advisers, certain institutional investment managers, and their associated persons, including buy-side analysts; (c) investment companies, hedge funds, and affiliated persons; and (d) any securityholder under circumstances in which it is reasonably foreseeable that the securityholder would purchase or sell securities on the basis of the information (“**Enumerated Persons**”).

Communications in the ordinary course within the Company among directors, officers or employees on matters related to the participants’ duties at the Company are not covered by Regulation FD.

Communications in the ordinary course of business with customers, suppliers or strategic partners, as well as communications with the press or news organizations, rating agencies or the government, are not covered by Regulation FD.

DAY-TO-DAY COMMUNICATIONS

It should be determined in advance whether it is intended that any material nonpublic information be disclosed in any planned conversations with Enumerated Persons. If so, the Company must follow the procedures set forth under the “Public Disclosure of Material Company Information” section below.

Inquiries from Enumerated Persons received by any director, officer or employee other than an Authorized Spokesperson should be forwarded to the head representative of the Investor Relations Department or another Authorized Spokesperson in the Investors Relations Department. Under no circumstances should any attempt be made to handle these inquiries without prior authorization from an Authorized Spokesperson.

The Investor Relations Department will periodically circulate key public statements to the Authorized Spokespersons to ensure awareness of information in the public domain.

PUBLIC DISCLOSURE OF MATERIAL COMPANY INFORMATION

Whenever an Authorized Spokesperson plans to disclose or discuss nonpublic Company information with anyone who is or may be an Enumerated Person, prior to such disclosure, the Authorized Spokesperson must, in consultation with the Legal Department and other departments as appropriate, determine whether the nonpublic Company information is material. Information is material if there is a substantial likelihood that a reasonable investor would consider it significant in making a decision to buy, hold, or sell a security. Both positive and negative information may be material.

Possible material information or events include, but are not limited to:

- Financial results, key metrics, financial condition, earnings pre-announcements, guidance, projections or forecasts, particularly if inconsistent with the company’s guidance or the expectations of the investment community;
- Changes to previously announced earnings guidance, or the decision to suspend earnings guidance;
- Restatements of financial results, or material impairments, write-offs or restructurings;
- Business plans or budgets;
- Significant corporate events, such as a pending or proposed merger, joint venture or tender offer, a significant investment, the acquisition or disposition of a significant business or asset or a change in control of the company;
- Significant related party transactions;
- Major events involving the company’s securities, including calls of securities for redemption, adoption of stock repurchase programs, option repricings, stock splits, changes in dividend policies, public or private securities offerings, modification to the rights of security holders or notice of delisting;
- Bank borrowings, government incentives, or other financing transactions out of the ordinary course;
- The establishment of a repurchase program for Company Securities;
- A change in the company’s pricing or cost structure;
- Major marketing changes;

- Major personnel changes, such as a change in executive management or employee layoffs;
- A change in auditors or notification that the auditor's reports may no longer be relied upon;
- Development of a significant new product, process, or service;
- Significant developments involving business relationships, including execution, modification or termination of significant agreements or orders with customers (e.g., multi-launch agreements), suppliers, distributors, manufacturers or other business partners;
- Significant operational information, such as changes in flight schedules, major modifications or performance issues, technological defects, significant pricing changes or other announcements of a significant nature;
- Significant developments in research and development or relating to intellectual property;
- Significant legal or regulatory developments, whether positive or negative, actual or threatened, including litigation or resolving litigation;
- Pending or threatened significant litigation, or the resolution of such litigation;
- Impending bankruptcy or the existence of severe liquidity problems, the creation of significant financial obligations, or any significant default under or acceleration of any financial obligation;
- Data breaches or other cybersecurity incidents;
- The imposition of a ban on trading in Company Securities or the securities of another company; and
- Updates regarding any prior material disclosure that has materially changed, including changes to publicly disclosed operational timelines.

Intentional Disclosures

If the determination is made that the information to be disclosed is material, the information must be disclosed prior to, or simultaneously with, the planned disclosure or discussion by the issuance of a press release, a filing or "furnishing" of a report on Form 8-K, both, or other means reasonably designed to provide broad, non-exclusionary distribution to the public. A posting on the Company's website or disclosure during an annual or other meeting of stockholders with no further action will not suffice as a means reasonably designed to provide broad, non-exclusionary distribution to the public.

The public disclosure may either disclose the material information or, if it is issued prior to disclosure to the Enumerated Person, may disclose that a conference call and/or webcast will be held to disclose the information. The public must be given adequate advance notice of any conference call and/or webcast and the means of accessing it. If a conference call or webcast is to be held after the issuance of a press release or the filing or "furnishing" of a report on Form 8-K to give analysts or major securityholders an opportunity to seek more information, the press release or the Form 8-K shall be released at least three days in advance or as soon as the conference call or webcast is planned, if later. The release shall announce such conference call or webcast and provide information including the date, time, subject matter, telephone number and/or webcast URL for the same. The conference call or webcast shall be open to analysts, media representatives, and the general public. Notwithstanding the foregoing, any meeting, conference call or webcast held for the purpose of providing immaterial information shall not be subject to the requirements of this paragraph.

Unintentional Disclosures

If the Company learns that it (or an Authorized Spokesperson) has unintentionally disclosed material nonpublic information selectively, it must publicly disseminate the information as soon as reasonably practicable, and in no event after the later of 24 hours or the commencement of the next day's trading on NASDAQ.

If a director, officer or an employee of the Company learns of information that causes such person to believe that a disclosure may have been misleading or inaccurate when made or may no longer be true, such person should report that information immediately to the Legal Department.

EARNINGS CALLS

Adequate advance public notice of at least three days shall be given of any quarterly earnings conference calls and/or webcasts. Notice shall include a press release issued to all major news wires and a posting on the Company's website with information including the date, time, subject matter, telephone number and/or webcast URL for the earnings call.

A quarterly earnings conference call and/or webcast must be open to analysts, media representatives, and the general public. Any such conference call or webcast must be recorded and the recording of the call maintained by the Company for at least 12 months. Web replay of such a call or webcast must be available for at least 12 months after the conference call.

The Company will make certain that a forward-looking statement safe harbor is recited orally at the beginning of the conference call or webcast and included on the recording so that the date of the information discussed in the conference call or webcast is unmistakable to listeners of the archived material. This practice reinforces the historical nature of the information discussed.

The Company will include forward-looking statement safe harbor language for written communications on its website if the archived webcast becomes written.

GUIDANCE

Neither the Company nor any employee of the Company will give earnings guidance in any form or manner (including "soft" or indirect guidance) in nonpublic settings. To the extent practicable, Authorized Spokespersons, including at least one member of the Investor Relations Department will be present during any analyst calls or meetings.

Any statements regarding earnings expectations will be limited only to press releases, reports on Form 8-K and publicly available earnings calls or webcasts.

Neither an Authorized Spokesperson nor any other employee, consultant or agent of the Company shall provide "comfort" with respect to an earnings estimate or otherwise "walk the Street" up or down (i.e., suggest adjustments to an analyst's earnings estimates). If an analyst inquires as to the reliability of a previously, publicly disseminated projection, the Authorized Spokesperson should follow the "no comment" policy. Please see the section "Analyst Reports" below for certain permitted communications with analysts.

QUIET PERIOD

Other than publicly disseminated statements, the Company will observe a "quiet period," during which the Company shall not have any discussions with any Enumerated Person with respect to any matters relating to the Company's earnings or other financial results for the period. The quiet period will begin fourteen calendar days prior to the end of each fiscal quarter and continue until the public

release of the Company's earnings results for that quarter.

ANALYST REPORTS

Analyst reports and earnings models may only be reviewed to correct errors that can be corrected by referring to publicly available, historical, factual information or to correct any mathematical errors. No other analyst feedback or guidance on earnings models may be communicated to an analyst.

No Company employee should distribute (including via a web link or social networks) copies of, or refer to, selected analysts' reports to anyone outside the Company. This is consistent with the Company's intention not to adopt, confirm or validate any particular analyst report.

ANALYST MEETINGS/INVESTMENT BANKER CONFERENCES / ROADSHOWS

This Policy will apply to communications between Authorized Spokespersons and Enumerated Persons at analyst meetings, investment banker conferences, and roadshows (other than roadshows undertaken in connection with a public offering of the Company's securities that are not subject to Regulation FD). For all such events, the disclosure procedures set forth under the preceding section titled "Public Disclosure of Material Company Information" should be followed.

USE OF SOCIAL NETWORKS

Use of social networks, including corporate blogs, employee blogs, chat boards, Facebook, LinkedIn, Instagram, X, and the like, to disclose material nonpublic information may be considered selective disclosure (and therefore violates this Policy).

RUMORS: NO COMMENT POLICY

The Company will not comment on market rumors in the normal course of business. When it is learned that rumors about the Company are circulating, Authorized Spokespersons should state only that it is Company policy to not comment on rumors. If the source of the rumor is found to be internal, the Company's General Counsel shall determine the appropriate response.

PRESS AND NEWS ORGANIZATIONS

Although statements made to members of the press do not fall within the scope of Regulation FD, contacts with the news media should only be by the Investor Relations Department, or by persons designated by the Authorized Spokespersons in a particular circumstance, such as a scheduled interview. Employees who are not Authorized Spokespersons and are contacted by any member of the press should refer such member of the press to the Investor Relations Department.

VIOLATION OF THIS POLICY

Violations of Regulation FD are subject to SEC enforcement action, which may include an administrative action seeking a cease-and-desist order, a civil action against the Company or an individual seeking an injunction and/or civil monetary penalties. Any violation of this Policy by a director or employee shall be brought to the attention of the Company's General Counsel and may constitute grounds for termination of service.

