

# WHISTLEBLOWER POLICY

## POLICY STATEMENT

Firefly Aerospace Inc. ("**Firefly**") is committed to open reporting as a core pillar of our culture of fairness, integrity and respect for each other, our values and the law. We ask questions, seek guidance and voice concerns when we are unsure about a situation or behavior. By speaking up, we can make Firefly even stronger as a workplace and business.

## WHO IS AFFECTED BY THIS POLICY

This policy applies to all Firefly employees, directors and officers as well as its subsidiaries and third-party contractors, consultants, agents and any other individual (collectively, "**individuals**" and "**team members**," and, singularly, "**you**") conducting business on behalf of Firefly. If you manage or supervise others, you have a special responsibility to lead with integrity by encouraging your team to feel comfortable raising concerns and asking questions.

## YOUR VOICE MATTERS

Firefly promotes a speak up culture where we value the help of individuals who speak up when they see something they believe may violate a law or Firefly policy. This includes complaints related to accounting, internal accounting controls or auditing matters and concerns regarding questionable accounting or auditing matters.

- Firefly expects employees to promptly ask questions, seek guidance, voice concerns and submit complaints through any of its speak up resources.
- Employees do not have to be certain a violation has occurred, they just need to have a good faith belief. "**Good faith**" means being sincere in providing honest and accurate information; it does not mean you have to be "right" about any concerns you voice.
- Employees are expected to fully cooperate in fact-finding reviews and answer all questions completely and honestly, including providing requested documents.

## NO RETALIATION & CONFIDENTIALITY

**Firefly never tolerates retaliation against anyone who voices a concern in good faith or participates or discloses information in a fact-finding review.**

Firefly protects employees from retaliation by: (a) providing an option to voice concerns anonymously; (b) committing to and enforcing our Whistleblower Policy; (c) cultivating a work environment where employees feel safe to voice concerns; and (d) proactively monitoring to prevent and detect retaliation.

Firefly will not discharge, demote, suspend, threaten, harass or in any manner discriminate against an employee in the terms and conditions of employment based upon any lawful actions of that employee with respect to his or her good faith reporting of any complaints or concerns under this policy. It is a violation of Firefly policy, and may, under certain circumstances, be a violation of federal or local law, for any Firefly supervisor, manager, director or officer to initiate or encourage reprisal against an employee or other person who in good faith reports a known or suspected violation of criminal law or any other matter which may be reported under this policy. An employee's right to

protection from retaliation does not extend immunity for any complicity in the matters that may be the subject of a complaint or an ensuing investigation.

This policy is not intended to limit employee reporting of alleged violations relating to accounting and auditing matters to proper government and regulatory authorities.

## WHISTLEBLOWER RESOURCES

We must report our concerns or suspected violations of our Firefly Code of Business Conduct or our policies to a resource that we are most comfortable using, such as a manager, a human resources or legal representative, or Firefly Compliance. Each will respond and promptly elevate the report by emailing Firefly Compliance.

## FIREFLY WHISTLEBLOWER HELPLINE

Firefly's Whistleblower Hotline is a confidential, independently operated service available 24 hours a day, 7 days a week to intake your concerns and questions, including anonymously, if you choose.

- Call: 833-416-6259 Toll-Free
- Visit: <https://firefly.ethicspoint.com>
- Access: QR Code via Mobile Phone



## FACT-FINDING REVIEW

Firefly thoroughly investigates every report. As part of the process, Firefly:

- Conducts an independent and objective fact-finding review.
- Implements corrective and/or continuous improvement actions, as appropriate, to improve our workplace.
- Provides feedback to the individual who voiced the concern, while maintaining confidentiality and privacy of those involved.
- Follows up, as appropriate, to ensure there is no retaliation and the report is resolved.

## CONSEQUENCES FOR VIOLATIONS

Employees who violate Firefly policies, deliberately voice false, malicious concerns that they know are not true, or abuse Firefly's Whistleblower Hotline may be subject to disciplinary action up to and including termination of employment. Violations of law could cause serious consequences, including reputational damage to Firefly and individual employees, as well as significant financial penalties, criminal penalties (fines and jail) and loss of business with commercial and government customers.