

**Eve Holding, Inc.**

**Code of Conduct**

**Effective Date**  
**May 9, 2022**

Dear Fellow Associate:

The Eve Holding, Inc. (collectively referred to herein with its direct and indirect subsidiaries as “Eve,” the “Company,” “we,” “us,” or “our”) Code of Ethics and Conduct reflects our commitment to meeting our business objectives ethically and transparently, developing internal and external relationships based on integrity, preserving the environment and contributing to the well-being of the communities where we operate.

The Code is based on best practices in corporate and accounting governance, with its fundamental aim being full compliance with laws and regulations applicable to the Company’s operations, and must be observed by all its employees. The Code is intended to meet the standards of a code of ethics under the Sarbanes-Oxley Act of 2002, as amended, and the standards of a code of business conduct and ethics under the listing standards of the New York Stock Exchange (the “NYSE”).

Every Eve employee, officer and member of our Board of Directors (whom we refer to collectively herein as “associates”) must comply with Eve’s Code of Conduct (this “Code”). Eve’s good reputation and credibility are built by all its people, through their acts and attitudes day after day. Eve believes that all business conduct must adhere strictly to the highest standards of integrity and propriety. Each associate is expected to use sound business judgment, adhere to the highest ethical and moral standards, follow the highest standards of business integrity, avoid conflicts of interest and comply at all times with the law and Eve policies.

All associates have a personal responsibility to comply with Eve’s policies, ask questions if they have doubts about the ethical or legal implications of any situation or proposed course of action and report any concerns they may have about any business practice that may violate the law or any of Eve’s policies.

Any associate:

- who observes or knows of violations of Eve’s policies or this Code;
- has a question about the legality of an action; or
- has a question as to whether an existing or potential conflict of interest exists

should discuss the matter with the General Counsel at [legal@eveairmobility.com](mailto:legal@eveairmobility.com) or contact the Ethics Hotline by telephone at 1-877-900-8779 (United States) or 0800-721-5968 (Brazil), or online at [www.embraerhelpline.com](http://www.embraerhelpline.com). No associate will suffer reprimand or retaliation in any form for reporting concerns in good faith.

We thank everyone for their dedication and commitment to fully appreciating and observing this Code, and to protecting the integrity of the Company.

**Gerard J. DeMuro**

Co-Chief Executive Officer (Co-CEO)

**Andre Duarte Stein**

Co-Chief Executive Officer (Co-CEO)

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## **Why We Have a Code of Conduct**

Eve depends on its associates to follow the law and make the right decisions. This Code provides practical overviews of some of the legal and ethical standards we all must follow on a daily basis. This Code is in addition to other Eve policies and procedures. It is your personal responsibility to ensure that you know, understand and are compliant with this Code. We believe a commitment to integrity, acting honestly and ethically and complying with the letter and the spirit of the law are critical to Eve's continued success.

### ***Adhering to the Code***

All board members, directors and employees of Eve and its subsidiaries, as well as third parties that represent the Company, must adhere to the principles outlined in this Code. Companies in which Eve has majority control must adopt the principles of this Code and those in which Eve has minority control must be encouraged to do so as well.

### ***Responsibility of Employees***

- To meet and ensure adherence to all principles in this code, as well as to observe the policies and internal procedures of the Company;
- To understand and be conscious of all laws and regulations associated with Company activities;
- To seek, whenever necessary, support and guidance from immediate leaders, as well as from the corporate areas of Eve, such as legal, compliance and human resources, to find solutions to queries and to understand the laws that must be adhered to;
- To report any concerns in relation to potential violation of the law, of this Code, or of the internal policies of the Company.

### ***Responsibility of Leaders***

- To meet and ensure adherence to all principles in this code, as well as to observe the policies and internal procedures of Eve;
- To promote a working environment that values an ethical attitude and the highest level of integrity in all activities;
- To have an in-depth knowledge of this Code, of internal policies and of the regulatory environment under their authority;
- To understand and introduce, when applicable, the requirements of laws and regulations, via the policies and internal procedures of Eve, in all daily activities;
- To supervise internal processes under their responsibility, including support with internal auditing, when necessary, in order to ensure compliance with the policies and requirements of the law;
- To act immediately when violations of this Code are identified, and to adopt preventive measures for the detection and solution of any failure or deviance in conduct;
- To seek, whenever necessary, corporate support and guidance from Eve's leadership, such as the legal, compliance and human resources departments, to find solutions to queries and to understand the laws that must be adhered to;
- To report any concerns in relation to potential violations of the law, of this Code, or of the internal policies of Eve.

### ***We Value Your Input***

Please review this Code carefully. If there is anything in this Code you do not understand or if you think something important is not covered, please let the General Counsel know. You can contact the General Counsel by email at [legal@eveairmobility.com](mailto:legal@eveairmobility.com).

### ***Asking For Guidance and Voicing Concerns***

Eve recognizes that no single document, including this Code, can give you an answer for every situation or dilemma that you may face. This Code points you to additional resources that may be useful. If your own

judgment and this Code do not provide the answer, please contact the General Counsel by email at [legal@eveairmobility.com](mailto:legal@eveairmobility.com). If you are uncertain about something you intend to do while conducting Eve business, you should seek advice from the General Counsel before acting.

As another avenue to assist you, Eve has established a toll-free Ethics Hotline, which you may use to ask questions or report concerns. You may do so anonymously. If you have a concern, you may contact the Ethics Hotline 24 hours a day, seven days a week by telephone at 1-877-900-8779 (United States) or 0800-721-5968 (Brazil), or online at [www.embraerhelpline.com](http://www.embraerhelpline.com).

We depend upon you to let us know if you see or learn something that suggests this Code or the law has been violated. See the “Reporting a Violation, Investigation and Remediation” section below for information regarding how to report any violations of this Code, other Eve policies or applicable law.

### ***Waivers and Revisions***

Waivers of or exceptions to this Code will be granted only in rare circumstances. Any waiver of this Code for a director or officer, or any amendment of this Code, may only be made by Eve’s Board of Directors or the appropriate committee of the Board of Directors and will be promptly disclosed in accordance with applicable laws, rules and regulations. All related person transactions must be approved by the Audit Committee in accordance with Eve’s **Related Person Transactions Policy**. Waivers for all other associates will be considered by the Chief Executive Officer or Co-Chief Executive Officers (as applicable), together with the General Counsel. Eve reserves the right to amend or modify this Code or other referenced policies at any time.

## **Compliance with Laws, Rules and Regulations**

Eve requires that all associates comply with all laws, rules and regulations applicable to Eve wherever it does business. You are expected to use good judgment and common sense in seeking to comply with all applicable laws, rules and regulations and to ask for advice from supervisors, managers or other appropriate personnel when you are uncertain about them. Associates should strive to identify and raise potential issues before they lead to problems, and should ask about the application of this Code whenever in doubt. Any questions relating to how these policies should be interpreted or applied should be addressed to the General Counsel.

## **Employment Policies and Practices**

Eve associates represent a diversity of ethnicities, races, genders, experiences, backgrounds, beliefs and identities. This is also true of our customers. Eve’s goal is to make everyone feel welcome, safe and at home, whether they are an associate or a guest.

### ***Cooperate with Airworthiness Authorities and Comply with Regulations and Policies***

As an aerospace company that is or will be regulated by airworthiness authorities around the world including the Agência Nacional de Aviação Civil, the European Aviation Safety Agency and the U.S. Federal Aviation Authority (FAA), Eve will provide the highest level of safety while accomplishing all development, flight testing, certification, production, and commercial flight operations. We are aware that there may be a higher than normal degree of risk associated with flight testing new or modified aircraft, and the Company expects you to follow all safety rules and best practices. We cooperate with the government officials who enforce these rules, as well as take necessary steps to protect ourselves, other employees, and the general public.

You must attend required safety training, and immediately report all accidents, injuries, and unsafe practices or conditions to the Human Resources Team. Our primary concern is for the safety of our employees, as well as the customers and families we entrust to our vehicles.

### ***Mechanisms for Reporting Unsafe Practices***

Voluntary safety reporting is an essential practice that allows us to be proactive and prevent accidents and injuries. The data gathered from such reports can be used to identify systemic vulnerabilities, the root causes of human error and, ultimately, help us succeed as a company. You must report any unsafe conditions, accidents, or injuries immediately to the appropriate leadership so that the Company can address these immediately. In situations where you may not feel comfortable reporting unsafe practices directly to management, use the anonymous reporting mechanisms described in the section entitled, “*Reporting a Violation, Investigation and Remediation.*”

### ***Equal Opportunity, Diversity and Respect***

Eve is committed to providing equal employment opportunities to associates and applicants regardless of race, color, religion, age, gender, sexual orientation, disability, national origin, citizenship, marital status, veteran status or any other characteristic that is protected by the laws and regulations to which Eve is subject. Unwelcome conduct, discrimination or discriminatory behavior based on any of these protected characteristics is forbidden. This includes conduct that creates an intimidating, offensive or hostile environment. This conduct can take many forms, including physical actions, spoken or written comments, and multimedia. Regardless of the form it takes, harassment negatively impacts individual work performance, team performance and our workplace as a whole, and will not be tolerated.

### ***Health and Safety***

Associates are expected to behave in a safe and responsible manner while at work. Associates must comply with all occupational, health and safety laws, and internal procedures, including for the reporting of accidents, injuries and unsafe equipment, practices or conditions. Acts or threats of violence will not be tolerated, nor will the possession of a firearm or other weapons in the work environment. Associates must never use, possess, transfer or sell illegal drugs; transfer or sell alcohol; or misuse other substances, including prescription drugs or over-the-counter medications, while on Eve premises or when conducting Eve business. In addition, associates must never report to work or perform work while under the influence of alcohol or illegal drugs.

### ***Import and Export Compliance***

In order to regulate technology considered to be important for national security, economic protection and competitiveness, and concerns about the end use or end user, the United States, and many other countries, have adopted laws that restrict or otherwise require government authorization or licensing for the export of certain goods, services, and technologies. Eve follows all laws pertaining to the export of goods, services, and technologies, including the International Traffic in Arms Regulations (ITAR) of the U.S. Department of State and the Export Administration Regulations (EAR) of the U.S. Department of Commerce. Eve’s products, services, and technologies are not currently subject to the ITAR, and the Company confirms this through regular, periodic reviews of its products, services, and technologies. The Company will always obtain any necessary EAR export licenses.

Additionally, all countries have rules governing the import of goods, including proper identification or classification of the import and payment of applicable tariffs, duties, and other charges. Eve is committed to complying with all applicable import regulations.

### ***Sanctions Control Program***

The U.S. Department of the Treasury, Office of Foreign Asset Controls (OFAC), has enacted regulations that control doing business with certain governments, individuals and entities, particularly foreign

governments, persons, and businesses. Eve complies with these regulations through its sanctions compliance program and provides training to employees whose work requires awareness of and compliance with OFAC regulations.

## **Conflicts of Interest**

All associates must engage in honest and ethical conduct, including avoiding any actual or apparent conflicts of interest. An associate has a conflict of interest if, in the course of employment or Board service, the associate's judgment and discretion is or may be influenced by considerations of personal gain or benefit, or gain or benefit to a third party. Conflicts of interest also arise when an associate, or a member of their family, receives improper personal benefits as a result of their position in the Company. Loans to, or guarantees of obligations of, such persons are of special concern. All business decisions for Eve should reflect the best independent judgment and discretion of Eve's associates, uninfluenced by any considerations other than what is honestly believed to be in the best interest of Eve and its shareholders. The divided loyalty that is present when an associate has a conflict of interest could potentially lead to serious problems for the associate and for Eve.

Each associate is responsible for recognizing a situation in which a conflict of interest is present or might arise and for taking appropriate action to eliminate or prevent such a conflict. Each associate should seek to avoid even the appearance of a conflict of interest. It is the responsibility of an associate to promptly disclose any transaction or relationship that reasonably could be expected to give rise to a conflict of interest to: (1) the General Counsel or (2) if an associate is an officer or director, to the Board of Directors, who shall be responsible for determining whether such transaction or relationship constitutes a conflict of interest.

Eve respects the privacy of its associates and their rights to conduct their personal affairs without interference. If an associate's personal affairs create a conflict of interest, a potential conflict of interest or the appearance of a conflict of interest, that associate must disclose all relevant facts pertaining to such matter in the manner described above. In many cases such disclosure will permit Eve and the associate to avoid any problems. If the facts are timely disclosed and if there is no illegal or unethical conduct involved, Eve may, in its sole discretion and provided that Eve was provided a full understanding of the situation, consent to the proposed activity even though a technical or nominal conflict of interest may exist, as provided under the "*Waivers and Revisions*" section above. Directors and officers must comply with additional rules and should refer to Eve's **Related Person Transactions Policy** for further guidance.

### ***Illustrations of Potential Conflicts of Interest***

While it is not possible to formulate a set of guidelines that could address all potential conflicts of interest, the illustrations below provide useful guidance. Specific questions regarding situations not clearly covered by this Code should be raised by an associate to the General Counsel.

#### ***Relationships with Strategic Partners, Suppliers, Customers or Competitors***

An associate should not own a substantial stock or other financial interest in or participate in the business of, or serve as a director, employee or consultant to anyone having or seeking business with Eve, including actual or potential vendors or service providers or any competitor of Eve.

The question of what constitutes a "substantial" stock or other financial interest will depend on the particular facts and circumstances in any given case. For example, an associate should not purchase stock on terms that are not generally available to the public from anyone having or seeking business with Eve or with a competitor of Eve.

### *Indirect Interest and Relationships*

A conflict of interest may arise because of the business activities of an associate's close relatives. An associate may have a potential conflict of interest when a close relative has a significant interest in a transaction with Eve or a significant relationship with a Strategic Partner, competitor or service provider or vendor. Such an associate should not make or influence any decision of Eve that could directly or indirectly benefit a close relative and, in order to protect the associate and Eve from the appearance of a conflict of interest, the associate should make appropriate disclosures to Eve as soon as they become aware of the situation.

### *Outside Business Activities*

Active participation on a part-time or freelance basis in any outside business, whether or not such business is a Strategic Partner, resource, competitor or non-retail customer of Eve, would also be a conflict if:

- the associate's participation in that business interferes with his or her ability to devote proper time and attention to his or her employment by Eve; or
- it detracts from the associate's contribution of his or her talents and creative energy to Eve.

### *Non-Business Activities*

Participation in the activities of a trade association, professional society, charitable institution or governmental institution on a non-compensated basis or holding part-time public office (with or without compensation) will not generally create a conflict that requires disclosure under this Code. If, however, such participation involves a substantial commitment of time, or if it involves an organization that conducts business with Eve, the General Counsel must be consulted and must approve such participation in advance.

### *Gifts, Loans and Entertainment*

Participating in business-related functions, including the acceptance of meals with a vendor, supplier, customer or competitor on occasion, is a normal and permissible business practice. Each associate, however, should exercise care to ensure such functions are infrequent, modest, intended to serve legitimate Eve business goals and are in compliance with applicable law. An associate and any member of his or her immediate family should not knowingly:

- accept loans of any amount from any persons or entities having or seeking business with Eve (a loan from a financial institution at market interest rates prevailing at the time of borrowing is, however, permissible);
- purchase a significant amount of goods for resale from Eve or Eve's vendors; or
- accept gifts, including cash, merchandise, trips or other valuable items, from a supplier, competitor or from anyone having or seeking business with Eve, other than non-cash gifts of nominal value (\$50 or less). Even gifts of nominal value should not be accepted on a repetitive basis from any one party. Associates should politely decline or return any gifts offered or received that are of greater than nominal value. If refusing or returning the gift is impractical or would damage a relationship of value to Eve, the gift should be given to Eve for charitable disposition or as Eve, in its sole discretion, deems appropriate.

Bribes and kickbacks are criminal acts that are strictly prohibited by law. Associates must not offer, give, solicit or receive any form of bribe or kickback anywhere in the world. The Foreign Corrupt Practices Act prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business. See Eve's **Global Anti-Corruption Policy** for further guidance.

### *Foreign Representatives, Agents and Consultants*

Commission or fee arrangements shall be made only with firms or persons serving as *bona fide* commercial representatives, agents or consultants to Eve. Such arrangements may not be entered into with any firm in which a government official or associate of Eve is known to have an interest unless the arrangement is

permitted by applicable law and has been specifically approved in advance by the General Counsel. All material commission and fee arrangements shall be memorialized in a contract. Any commission or fee must be reasonable and consistent with normal practice for the industry, the merchandise involved and the services to be rendered. Under no circumstances shall any payments be made in cash. See Eve's **Global Anti-Corruption Policy** for further guidance.

***Protection and Proper Use of Corporate Property and Corporate Information; Corporate Opportunities***

All associates should seek to protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's financial performance. An associate should not:

- use or divert any corporate property, including the services of other associates, for the associate's own advantage or benefit;
- use corporate letterhead paper when writing letters on personal or other matters not directly related to Eve's business, as use of Eve's name could expose Eve to potential liability for activities beyond the scope of the associate's employment;
- make misrepresentations with respect to the capacity in which the associate represents Eve; or
- (1) take for himself or herself personal opportunities that are discovered through his or her position with Eve or use the property, resources or information of Eve in connection with such opportunities (2) use Eve's property, information or position for improper personal gain, or (3) compete with Eve. Associates owe a duty to Eve to advance its legitimate interests whenever possible.

## **Competition and Fair Dealing**

The antitrust laws of the United States are intended to promote vigorous competition in a free market. It is in Eve's best interest to promote free and open competition. Eve must make its own business decisions, free from understandings or agreements with competitors that restrict competition. While it is beyond the scope of this Code to explain the antitrust laws in detail, Eve considers compliance with these laws vitally important. When in doubt about compliance with the antitrust laws, associates must seek the advice of the General Counsel.

Associates shall at all times deal honestly, ethically and fairly with Eve's suppliers, customers, service providers, competitors and other associates. Statements regarding Eve's products and services must not be untrue, misleading, deceptive or fraudulent. You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

## **Confidential and Insider Information**

Unauthorized disclosure or use of Eve confidential information is prohibited both during and after an associate's employment or Board service. Information that is provided to associates, or as to which associates become aware and information to which associates have access is only for use in performing their Eve responsibilities. Associates may not share such information outside of Eve or use such information in any unauthorized or illegal way.

### ***Confidential Information***

All information and know-how whether or not in writing and existing in any form of media or otherwise, of a private, secret or confidential nature pertaining to Eve's business or financial affairs or the business or financial affairs of its affiliates (collectively, "Confidential Information") is confidential and proprietary and shall be the exclusive property of Eve. Confidential Information includes, among other things, trade secrets; operating techniques, procedures and methods; product specifications; customer lists and customer information; account information; cost and pricing information, including both Eve's internal cost and

pricing and external costs and pricing provided to Eve by vendors and suppliers; budgets; correspondence with customers, vendors, competitors, employees, partners or any other entity or person; business and development plans and strategies; training materials, sales techniques and supporting documentation; projections; drawings; software; samples; prototypes, schematics and other projects developed by or for Eve; leads from any source; marketing techniques; total quality management operational procedures and other procedures and methods; employee lists; financial performance, results, prospects or internal financial reports (including, but not limited to, internal sales and/or profit and loss reports) of Eve and its affiliates; sourcing lists; recruiting lists; digital technologies and other technological developments; enterprise application tools utilized for scheduling, cost and back-of-house management, and the information contained in same; and other competitive information developed by or on behalf of Eve.

Confidential Information should be appropriately guarded and not disclosed or used for unauthorized purposes during or after an associate's employment with or service to Eve. Disclosure of Confidential Information may be authorized by a supervisor or legally permitted in connection with reporting illegal activity to the appropriate regulatory authority. Unauthorized disclosure of Confidential Information is prohibited. Confidential Information should not, among other things, be left where others can see it, sent to unattended fax machines or printers, or discussed where others may hear. Associates should properly safeguard documents at all times. For example, after a meeting, whether on or off Eve premises, associates should not leave any written materials behind including materials written on whiteboards. All materials containing Confidential Information (reports, presentations, etc.) should be labeled as confidential. Each associate should exercise care to reduce the likelihood of unauthorized disclosures or use of Confidential Information. Associates should guard against even seemingly innocent or inadvertent disclosures to spouses, friends and business associates.

Third parties may ask associates for information about Eve. Subject to the exceptions noted in the above, associates (other than Eve's authorized spokespersons) must not discuss Confidential Information with, or disseminate Confidential Information to, anyone, except as required in the performance of their Eve duties and, if appropriate, with an outside party after a confidentiality agreement is in place. If you receive any inquiries of this nature, you must decline to comment and refer the inquirer to a supervisor or one of Eve's authorized spokespersons at [investors@eveairmobility.com](mailto:investors@eveairmobility.com).

No associate should attempt to obtain Confidential Information that does not relate to the associate's employment duties. If an associate comes into possession of Confidential Information that does not relate to his or her duties, or has a question as to whether an existing or potential issue exists related to Confidential Information, s/he should promptly contact the General Counsel.

### ***Eve Records***

Eve policy is to retain its records only for as long as the records are being actively used, unless applicable law or business needs require longer retention. This policy applies to records maintained in all forms at Eve, including records kept in written and electronic form.

Record or evidence relevant to a legal action, investigation, audit or other special circumstance may not be destroyed or discarded without the approval of the General Counsel. If Eve receives a subpoena, a request for records or other legal papers, or if there is reason to believe that such a request or demand is likely, Eve will instruct you to retain all records that are relevant to the matter. You must comply with such instructions. If you receive a request for information or other legal documents, you must promptly notify the General Counsel.

### ***Eve Property Ownership***

All physical property, materials, documents, digital or electronic data, communications, and information obtained, generated, or transmitted by you for the Company's business or on the Company's behalf is the

sole property of Eve. The Company reserves the right to monitor, intercept, review, and remotely wipe all Eve content from any device, including your personal devices, such as a laptop or smartphone. You have no expectation of privacy in any Eve property or content. In the event of an internal investigation, the Company reserves the right to access the entire contents of your personal devices in order to determine whether any Company data resides on the devices. Eve will not be responsible for any losses, damages, or liability arising out of the use of any device for the Company's business, except for devices expressly authorized by the Company for business purposes.

### ***Internet, email and social media***

Internet and email are provided by Eve for working communications. It is not permitted to use electronic systems, Internet, email or social media to transmit, receive or download content that may impair the performance of Eve's work activities or interests. Social media, at work or in any other place, must not be used to disclose Confidential Information. It is also forbidden to upload content containing images of the Company, its products or its employees.

### ***Insider Trading***

Associates may have access to or become aware of material non-public information relating to Eve or other companies we work with. No associate may trade illegally in securities or provide insider tips to others. Insider trading laws are vigorously enforced and penalties can be severe, including million-dollar fines and multi-year jail terms.

If an associate is aware of material non-public information relating to Eve or its securities, that associate may not, directly or indirectly through family or others:

- buy or sell Eve securities or otherwise take an action to take personal advantage, or
- provide the information to any outside party, including family and friends.

If you are notified that you are covered by a restricted trading window or other trading blackout period, you may not buy or sell Eve securities until the restriction has been lifted.

See Eve's **Insider Trading Policy** for further guidance, including examples of material non-public information, how transactions under stock plans are treated, additional prohibitions on speculating, short-selling and trading in companies with which we may do business, obligations if you leave Eve and additional trading and reporting obligations for directors and officers.

## **Accounting and Payment Practices**

Associates must honestly and accurately report all business transactions. All Eve books, records and accounts shall be maintained in accordance with all applicable regulations, standards and policies and must accurately reflect the true nature of the transactions they record. Eve requires full, fair, accurate, timely and understandable recording and reporting of information.

Use of Eve funds or other Eve property for illegal, fraudulent, unethical or otherwise improper purposes is strictly prohibited.

Some examples of improper accounting or payment practices include:

- capitalizing costs that should be expensed;
- recording expenses or income in the wrong period;
- recording credits or charges that are not appropriately documented or approved;
- false, misleading or otherwise unclear entries in Eve's books or records;
- disregarding the requirements of Eve policies relating to financial reporting; and

- creation or use of so-called “slush funds” (secret accounts of money diverted from corporate accounts or collected from corporate personnel that are used for political contributions, bribes or other improper or questionable purposes).

The legal consequences for companies and individuals who have engaged in these practices are extremely serious. These consequences can include federal criminal prosecution or expensive, time-consuming civil actions brought by various governmental agencies and private parties.

This Code make absolutely clear that all improper accounting or payment practices and all similar practices, whether legal or illegal, are strictly prohibited.

### ***Political Contributions***

No Eve funds or other Eve property shall be used for political campaigns. Any political activities must be conducted on your own time and using your own resources. Eve does not permit compensation or reimbursement to associates for political contributions.

### ***Payments to Government Personnel***

Direct or indirect payments or gifts to government personnel from either Eve’s or private funds in furtherance of Eve business are prohibited, whether or not it is accepted practice in that the United States or in a foreign country. See this Code’s “Gifts, Loans and Entertainment” section and Eve’s **Global Anti-Corruption Policy** for further guidance.

## **Public Disclosures and Other External Communications**

Eve policy is to make full, fair, accurate, timely and understandable disclosure in compliance with all applicable laws and regulations in all reports and documents that Eve files with, or submits to, the U.S. Securities and Exchange Commission and all other governmental, quasi-governmental and self-regulatory bodies and in all other public communications made by Eve and in all other public communications. Associates shall not knowingly falsify information, misrepresent material facts, or omit material facts, necessary to avoid misleading the Eve’s independent registered public accounting firm or investors. Associates shall never take any action to coerce, manipulate, mislead, or fraudulently influence the Eve’s independent registered public accounting firm in the performance of its audit or review of the Eve’s financial statements. All associates are required to comply with this policy and to abide by Eve standards, policies and procedures designed to promote compliance with this policy, including Eve’s **Regulation FD Policy**.

No associate should make any public statements, including through social media, on Eve’s behalf without proper authorization. If you are contacted by the media, please refer them to one of Eve’s authorized spokespersons at [investors@eveairmobility.com](mailto:investors@eveairmobility.com).

## **Interaction with Government Authorities**

Eve values its relations with local, state and federal governments and authorities. From time to time, associates may interact with local government officials and authorities, whether for permitting or approvals or for a health inspection, among other things. Eve is committed to complying with applicable local laws, regulations and codes and to working fairly and honestly with local officials and authorities where we do business. The actions of all associates must meet high ethical and legal standards. No associate may offer or make a payment or gift of any kind in order to facilitate a local process or to influence a local government official or authority, such actions may be a violation of law. A representative of the government may seek to interview you regarding your business activities or work at Eve. In such event, you and Eve have the

right to be represented by counsel. If you are contacted by a government agent or representative and asked to provide information about Eve, you must contact the General Counsel.

Eve will deal honestly and fairly with government representatives and agents and will comply with valid governmental requests and processes. Associates must be truthful and straightforward in their dealings with the government and should not direct or encourage others to provide false or misleading information to any government agent or representative.

From time to time, government agents or representatives may seek to inspect Eve's facilities. If an inspector appears at any such facility, promptly notify your manager.

If someone arrives unexpectedly at one of Eve's facility and attempts to serve legal papers, promptly notify your manager. Make sure all legal documents you receive are forwarded promptly to the General Counsel at [legal@eveairmobility.com](mailto:legal@eveairmobility.com).

If you need further information regarding interactions with government representatives and agents, please contact the General Counsel or use the Ethics Hotline.

## **Community Engagement and Sustainability**

We are focused on being a good steward of the natural environment through the production and development of innovative designs that reduce resource use and energy consumption, and which have a full life-cycle design approach. Eve's values are based on a belief that businesses can be force multipliers for good, creating a positive impact on local communities and the planet. As we work to advance the world's transition to sustainable transportation, we have a responsibility to minimize our impact on the environment, natural resources, and the world around us. We promote sustainable energy and green business practices. The Company is committed to avoiding adverse environmental impacts, as well as injury to the environment and the communities in which we do business. Eve supports sustainability and environmental protection initiatives, including the reduction of waste, emissions, and energy use. Eve strives to be a social and environmental leader, committed to a net-positive future for all our stakeholders.

## **Reporting a Violation, Investigation and Remediation**

A violation of applicable law or Eve policies, including this Code, harms Eve and anyone with an economic interest in Eve. A violation may also expose the associate and/or Eve to civil and/or criminal liability.

Taking action to prevent problems is part of Eve's culture. Any associate who knows of, or reasonably believes there is, a violation or possible violation of any applicable laws, rules or regulations or Eve policies, including this Code, should promptly report that information to the General Counsel. Alternatively, an associate may report the information to the Ethics Hotline, either by name or anonymously, by telephone at 1-877-900-8779 (United States) or 0800-721-5968 (Brazil), or online at [www.embraerhelpline.com](http://www.embraerhelpline.com).

Eve will promptly investigate all reports of suspected violations and will take steps to effectively remedy the situation when a violation has occurred. Every manager is responsible for assisting Eve in implementing all Eve policies, including this Code. Every associate is expected to adhere to this Code, other Eve policies and applicable law both in practice and in spirit. No associate will suffer discipline, reprimand or retaliation in any way for reporting concerns or violations in good faith (unless it is determined that the report was made with knowledge that it was false) or who cooperates in any investigation or inquiry regarding such conduct. Eve will take corrective action and/or disciplinary action against anyone who retaliates, directly or indirectly, against an associate who reports a suspected violation.

Associates who make an anonymous report to the Ethics Hotline by telephone at 1-877-900-8779 (United States) or 0800-721-5968 (Brazil), or online at [www.embraerhelpline.com](http://www.embraerhelpline.com) will be given a case number. This case number shields the associate's identity from management while providing the associate with the ability to call back to check on the status of the report or to provide additional information.

Upon receipt, a report concerning a possible violation will be reviewed and the General Counsel shall, as appropriate: (a) evaluate such information; (b) determine whether it is necessary to conduct an informal inquiry or formal investigation and, if so, initiate such inquiry or investigation; and (c) report the results of any such inquiry or investigation, together with a recommendation as to disposition of the matter to the appropriate officer for action. Associates are expected to cooperate fully with any inquiry or investigation by Eve regarding an alleged violation. Failure to cooperate with any such inquiry or investigation may result in disciplinary action, up to and including termination. Failure to comply with the law and Eve policies, including this Code, can have severe consequences for Eve and the associates involved. Discipline also may be imposed if: (a) an associate fails to report a violation; (b) an associate retaliates against another associate for reporting a violation or cooperating in an investigation; (c) an associate makes a false report or is untruthful in the course of an investigation; (d) an associate directs or encourages improper or illegal conduct; or (e) the circumstances reflect inadequate or improper behavior. Certain violations may require Eve to refer the matter to the appropriate governmental or regulatory authorities for investigation or prosecution.

This Code does not prohibit you from engaging in concerted activity protected by the rules and regulations of the National Labor Relations Board or from testifying, participating or otherwise assisting any state or federal administrative, judicial or legislative proceeding or investigation.