



**SPIRE GLOBAL, INC.
Code of Business Conduct and Ethics**

(Adopted on August 16, 2021, effective upon the closing of Spire Global, Inc.'s business combination with NavSight Holdings, Inc.)

At Spire Global, Inc. (together with its affiliates and subsidiaries, "**Spire**"), we strive to inspire, lead, and create the business of Earth observation for the benefit of all. Our core values - Global, Faster, Reliable, Relentless, Unbounded, and Collaborative - guide everything we do. Our values are more than just words to make us feel good, they are guiding principles for how we operate our business, make decisions, and measure our success. They are the standard to which we hold ourselves and each other accountable in our day-to-day conduct.

Implicit in our values is that we conduct our business with a firm commitment to ethics and compliance. As we continue to build the "great," we are equally committed to always acting in accordance with the "good." This Code of Business Conduct and Ethics reflects that commitment by setting forth what's expected, and what's appropriate, in the business world and within Spire.

We expect all Spire employees to be completely familiar and always act in accordance with the Code, so that we may continue to meet the highest standards of ethics as we continue to excel together.

Sincerely,
Peter

A. Purpose

Spire is committed to complying with all applicable laws and regulations (“**Laws**”), to maintaining the highest standards of ethical conduct, and to treating people with dignity, honesty, and respect. This Code of Business Conduct and Ethics (this “**Code**”) was adopted to further Spire’s commitment to these values and summarizes certain of Spire’s most important compliance obligations. This Code applies to everyone who does business on behalf of Spire, including all directors, officers, and employees of Spire (who, unless otherwise specified, are collectively “**employees**”), as well as contractors, consultants, agents, brokers, distributors, or other intermediaries acting on behalf of Spire. For purposes of this Code, “contractors” and “consultants” shall mean contractors and consultants who provide services to Spire.

This Code is intended to ensure and promote:

1. fair and accurate financial reporting;
2. ethical conduct and compliance with applicable laws, rules, and regulations including, without limitation, full, fair, accurate, timely, and understandable disclosure in reports and documents we file with or submit to the Securities and Exchange Commission and in our other public communications;
3. the prompt internal reporting of violations of this Code, as set forth in this Code;
4. honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
5. a culture of honesty and accountability; and
6. the deterrence of wrongdoing.

This Code serves as a source of guiding principles, but cannot address every possible circumstance you might encounter. In addition to complying with the Code, Spire expects employees, contractors, and consultants to follow Spire’s other policies and procedures which supplement and form a part of this Code, and exercise sound judgment at all times in line with the high ethical standards to which Spire is committed. Following the Code is essential to Spire’s success and our reputation as an ethical company.

You are expected to read the policies set forth in this Code and ensure that you understand and comply with them. Spire’s Legal Team, including the Chief Compliance Officer who heads the Compliance Department, is responsible for applying these policies to specific situations in which questions may arise and has the authority to interpret these policies in any particular situation. Any questions about this Code or the appropriate course of conduct in a particular situation should be directed to the Legal Team, who may consult with Spire’s outside legal counsel or Spire’s Board of Directors (the “**Board**”), as appropriate.

This Code should be read in conjunction with the other policies applicable to an employee, contractor, or consultant. Any determination with respect to the applicability of the provisions of this Code with respect to officers or directors of Spire may be made only by the Board.

B. Financial Reports and Other Records – Disclosure

Employees, contractors, and consultants are responsible for the accurate and complete reporting of financial information within their respective areas of responsibility and for the timely notification to senior management of financial and non-financial information that may be material to Spire. Spire expects all of its employees, contractors, and consultants to take this responsibility very seriously to ensure full, fair, accurate, timely, and understandable disclosure in reports and documents that Spire files with government agencies or releases to the general public.

Each employee, contractor, and consultant, to the extent involved in Spire's disclosure process, including without limitation, the Chief Executive Officer, Chief Financial Officer, and other senior employees who perform similar functions in Spire (collectively, "**Senior Financial Officers**"), must familiarize themselves with the disclosure requirements applicable to Spire as well as the business and financial operations of Spire, and must not knowingly misrepresent, or cause others to misrepresent, facts about Spire to others, whether within or outside Spire, including to Spire's independent auditors, governmental regulators, and self-regulatory organizations.

All of Spire's books, records, accounts, and financial statements must be maintained in reasonable detail, and reflect the matters to which they relate accurately, fairly, and completely. Furthermore, all books, records, accounts, and financial statements must conform both to applicable legal requirements and to Spire's system of internal controls. All assets of Spire must be carefully and properly accounted for. No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading entries shall be made in Spire's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation and authorization. Misclassification of transactions as to accounts, business units, or accounting periods is forbidden. Each employee, contractor, and consultant bears responsibility for ensuring that they are not party to a false or misleading accounting entry.

C. Conflicts of Interest

A conflict of interest is any activity or interest that is inconsistent with or opposed to the best interests of Spire. Your decision and actions in the course of employment or other relationship with Spire should be based on the best interests of Spire and not based on personal relationships or benefits. You must never use or attempt to use your position with Spire to obtain improper personal benefits. Any situation, transaction, or relationship that may give rise to an actual or potential conflict of interest must be disclosed to Spire and shall be avoided, unless approved by Spire.

The following are some examples of conflicts of interest to be avoided:

1. Family Members. You may not conduct business on behalf of Spire with family members or an organization with which a family member is associated, unless such business relationship has been disclosed to and authorized by Spire and is a bona fide arms-length transaction. "Family members" include a spouse, parents, children, siblings and in-laws.
2. Business Opportunities. Employees owe a duty to Spire to advance Spire's business interests when the opportunity to do so arises. Spire's business

opportunities include any and all opportunities that relate to Spire's existing lines of business or that you otherwise identify in the course of performing your job responsibilities for Spire. You may not take or direct someone else to take a business opportunity that is discovered through the use of Company property, information, or your position with Spire, unless Spire has already been offered the opportunity and turned it down. More generally, you are prohibited from using Company property, information, or position for personal gain. You may not compete with Spire directly or indirectly, including by taking on outside employment that could have a negative impact on your performance at Spire or conflict with your obligations at Spire. Please refer to A Guide to Spire for further information on Spire's policies related to outside employment.

3. Investment Interests in Other Businesses. Spire employees and members of their immediate families must avoid outside financial interests that might improperly influence your decisions or actions on behalf of Spire. Conflicting financial interests involve investments in competitors, customers, or partners of Spire. You may not accept compensation in any form for services performed for Spire from any source other than Spire. You should not have an undisclosed material financial interest in a competitor, supplier, customer, or business partner of Spire.
4. Improper Conduct and Activities. You may not engage in any conduct or activities that are inconsistent with Spire's best interests or that materially disrupt or impair Spire's relationship with any person or entity with which Spire has or proposes to enter into a business or contractual relationship.
5. Gifts and Gratuities. This policy does not prohibit normal, appropriate, and modest hospitality to or from third parties. These customary courtesies are designed to build goodwill among business partners. You should, however, be mindful that public officials may be restricted in the benefits they can accept for performing their duties, including non-cash benefits such as travel, meals, and entertainment. The practice of giving business gifts and taking part in corporate hospitality or undertaking speaking engagements varies among countries, regions, and industries. What may be normal and acceptable in one may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable (both from the perspective of the provider and recipient) rather than lavish and extraordinary; bearing in mind that what may normally be viewed as small or insignificant in some countries can be of significant value in another. The intention behind the gift should always be considered and nothing should be explicitly or implicitly expected or demanded in return. The giving of gifts and corporate hospitality or entertainment is not prohibited, if the following requirements are met:
 - a. it is done in the normal course of Spire's business and without the intention of, or without a reasonable prospect of, influencing a third party to obtain or retain an improper business advantage, or to reward the provision or retention of an improper business advantage, or in explicit or implicit exchange for favors or benefits;
 - b. it complies with applicable law;
 - c. it does not include cash or a cash equivalent;

- d. it must be properly recorded and disclosed, and not paid personally to avoid any approval or disclosure requirements;
 - e. taking into account the reason for the gift or hospitality, it is of an appropriate type and value in the applicable country/region and given at an appropriate time;
 - f. it is given openly and in Spire's name, not secretly;
 - g. it is not given or received frequently between the same individuals; and
 - h. gifts or hospitality should not be offered to any person or company, public/foreign officials or government representatives, or politicians or political parties, unless in accordance with the Global Anti-Corruption Policy, which can be found on Spire's internal website. If you have any questions about gifts or hospitality, please contact the Compliance Department (compliance@spire.com).
6. Personal Use of Company Assets. You may not use Company assets, labor or information for personal use, other than incidental personal use, unless approved by Spire.

Evaluating whether a conflict of interest exists can be difficult and may involve a number of considerations. We also encourage you to seek guidance from your manager, the Chief Compliance Officer, the Legal Team, or the People Team when you have any questions or doubts.

If you are aware of an actual or potential conflict of interest where your interests may conflict with Spire's interests, or are concerned that a conflict might develop, please discuss with your manager and then obtain approval from the General Counsel or their designee before engaging in that activity or accepting something of value. Please also note that, to the extent your proposed engagement or activity could constitute a "related person transaction," it also must comply with our Related Person Transaction Policy and Procedures.

D. Protection of Assets, Confidentiality and Communications

You should endeavor to protect Spire's assets and ensure their efficient use. Spire employees must never use Spire's name, trademarks, letterhead, or other intellectual property or other assets for any purpose other than conducting business on behalf of Spire. It is never permissible to use Spire Resources for personal gain, outside business, or other unauthorized purposes. Any suspected incident of fraud or theft should be reported immediately to your immediate supervisor or manager or other appropriate Company employees for investigation.

In carrying out Spire's business, you may learn confidential or proprietary information about Spire, its customers, suppliers, or business partners. Confidential or proprietary information of Spire, and of other companies, includes any non-public information that would be harmful to the relevant company or useful to competitors if disclosed.

You must maintain the confidentiality of information about Spire and other companies entrusted to you by Spire, use the information only for permissible business purposes and in



accordance with any restrictions imposed by the disclosing party, and limit dissemination of the confidential information, both inside and outside Spire, to people who need to know the information for business purposes and who are bound by similar obligations of confidentiality, unless disclosure is authorized or legally mandated.

The obligation to protect Spire's confidential information is in addition to any Proprietary Invention Assignment or similar agreement that you have entered into with Spire. The obligation to protect confidential information does not end when you terminate your relationship with Spire. Any questions about whether information is confidential should be directed to the Compliance Department (compliance@spire.com).

If you are contacted by a member of the financial community, the press, or any other outside organization or individual, you may not provide information regarding Spire's business except pursuant to the Regulation FD Compliance and External Communications Policy (the "**Communications Policy**") on Spire's internal website. This includes, among other things, answers to questions on overall business trends, business in different geographies, pricing, suppliers, new offerings or technologies, and lawsuits or disputes.

In order to ensure the accuracy and consistency of Spire's communications, all public disclosures of information about Spire must be made through Spire's Communications Team or at their direction. Spire employees are not authorized to disclose any information regarding Spire to the media or other third parties without the prior written authorization of an authorized spokesperson for Spire or the Communications Team. All media and third party inquiries must be referred to the Communications Team.

For information about the appropriate use of social media with regard to Spire, please refer to the Communications Policy.

E. Competition

1. Fair Dealing

Spire has a history of succeeding through honest business competition. Spire does not seek competitive advantages through illegal or unethical business practices. You should endeavor to deal fairly with each other and with Spire's customers, service providers, suppliers, business partners, and competitors. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice.

Spire adheres to robust quality standards in its products and services, and we aim to exceed expectations in all that we do. Therefore, Spire expects its employees to make a personal commitment to excellence in all work for and on behalf of Spire. Spire employees must comply with all contract requirements and internal policies and procedures relating to the quality and specifications of Spire's products and services.

2. Competition Laws

Competition encourages innovation and results in better and more affordable products and services. Competition laws and regulations throughout the world (known as antitrust laws in

the United States) are designed to foster a competitive marketplace and prohibit activities that restrain trade.

Generally, actions taken in combination with other companies that restrain competition may violate antitrust and competition laws. Some of the most serious antitrust offenses are agreements between competitors that limit independent judgment and restrain trade, such as agreements to fix prices, restrict output or control the quality of products, or to divide a market. You should not agree with any competitor on any of these topics, as these agreements or understandings, even if informal, are nearly always unlawful. Any communication with a competitor's representative, no matter how innocuous it may seem at the time, may later be subject to legal scrutiny and form the basis for accusations of improper or illegal conduct. Certain antitrust violations involving agreements with competitors are criminal and can result in large fines and prison terms for the individuals involved. In addition, actions taken by an individual company in market segments in which it has a particularly strong position may violate antitrust laws if the actions have the effect of excluding competition through unfair means.

Spire is dedicated to compliance with laws governing fair competition in all of its activities. Any activity that undermines this commitment is unacceptable. The laws governing this area are complex, and you should consult with the Chief Compliance Officer (compliance@spire.com) whenever in doubt as to whether a particular interaction or agreement is improper.

F. Compliance with Laws, Rules and Regulations

You must respect and obey all laws when carrying out responsibilities on behalf of Spire and refrain from illegal conduct.

You have an obligation to be knowledgeable about specific laws, rules, and regulations that apply to your area of responsibility. If a law conflicts with a policy in this Code, you must comply with the law.

Any questions as to the applicability of any law should be directed to the Compliance Department (compliance@spire.com). The following is a brief summary of certain non-exclusive topics about which you should be aware:

1. Health, Safety and Environment

Spire strives to conduct its business activities and operations in a manner that promotes protection of people and the environment. Compliance with all applicable laws, rules, and regulations governing health, safety and the environment are a responsibility of management and employees, contractors, and consultants in all functions. Please refer to A Guide to Spire for more detailed information regarding Spire's policies and practices regarding workplace health and safety and related issues.

2. Fair Employment Practices

Spire works to maintain a work environment in which all individuals are treated with respect and dignity. Every individual has the right to work in a professional atmosphere that promotes equal employment opportunities and where discriminatory practices, including harassment, are prohibited.



Spire requires each employee, contractor, and consultant to treat all colleagues in a respectful manner and to forge working relationships that are uniformly free of bias, prejudice, and harassment. Spire prohibits discrimination against or harassment of any employee on the basis of race, religion, color, sex, pregnancy, national origin, age, physical or mental disability, military or covered-veteran status, marital status, sexual orientation, family medical leave, gender identity, or any other classification protected by applicable federal, state or local law.

Any employee, contractor, or consultant who is found to have discriminated against another employee, contractor, or consultant is subject to discipline up to and including termination.

You will not suffer any reprisals or retaliation for making complaints or reporting any incidents of discrimination or perceived discrimination, or for participating in any investigation of incidents of discrimination or perceived discrimination.

Please refer to A Guide to Spire for more detailed information regarding Spire's policies and practices regarding harassment, discrimination, and other workplace issues.

3. Political Activities

Spire does not make contributions to political candidates or political parties except as permitted by applicable laws.

Employees, contractors, and consultants engaging in political activity will do so as private citizens and not as representatives of Spire. Your personal lawful political contribution, or decision not to make contributions, will not influence your compensation, job security, or opportunities for advancement.

4. Lobbying

Lobbying refers to communications with government officials for the purpose of influencing public policy or to request political action on particular issues. Spire employees must comply with the lobbying laws in each country where Spire does business. In addition, Spire employees must consult with the Compliance Department (compliance@spire.com) before hiring a lobbyist, engaging in direct lobbying, or communicating with public officials on behalf of Spire. Please refer to Spire's Anti-Bribery and Anti-Corruption Compliance Policy for more information.

5. Anti-Corruption and Anti-Bribery Laws

It is the policy of Spire to comply with all anti-corruption and anti-bribery laws and regulations in all the jurisdictions in which we operate or conduct business. You may only transact business on behalf of Spire in accordance with Spire's established policies regarding anti-corruption and anti-bribery consistent with applicable law, including, but not limited to, the United States Foreign Corrupt Practices Act (the "**FCPA**"), the United Kingdom Bribery Act of 2010, the Singapore Prevention of Corruption Act, and the Luxembourg Criminal Code. You must never engage in any bribery, kickbacks or other types of corruption when dealing with customers, suppliers, or other third parties regardless of local practices or competitive intensity. Specifically, you must never directly or indirectly via a third party make or provide a payment (including cash or any other items of value such as meals, gifts, travel, entertainment, etc.) to a foreign official or person in government or business to corruptly influence the foreign official or



person in government or business, obtain or retain business for Spire, or to acquire any improper advantage.

If you are unaware of the legal rules involving these activities, you should consult with Spire's Chief Compliance Officer before taking any such action. For more information about anti-corruption laws and the rules governing gifts, hospitality, and providing things of value to foreign officials, please reference our Anti-Bribery and Anti-Corruption Compliance Policy, which can be found on Spire's internal website, or contact the Compliance Department (compliance@spire.com).

6. Trade Controls

Spire is a global company with operations, customers, and partners around the world. Each country in which Spire does business has enacted laws governing exports and imports. Spire employees must comply with all of these laws and without limitation, Spire's Export Control Policy, available on Spire's internal website. Spire employees should seek guidance, before acting, if ever uncertain how these laws and the policy apply in a particular case.

7. Sanctions and Unauthorized Boycotts

Each country in which Spire does business has enacted sanctions laws. Sanctions laws (including embargoes and boycotts) restrict or prohibit business activities with targeted countries, governments, entities, organizations, and individuals. Spire employees must check with the Legal Department before conducting business in or with sanctioned countries or with sanctioned governments or parties.

Not all countries agree on sanctions and boycotts. From time to time, a country may prohibit or penalize compliance with another country's sanctions and/or boycott laws. Spire employees must contact the Legal Department if a sanctions or boycott law appears to conflict with the laws of another country.

Spire's Sanctions and Anti-Boycott Policy and Guidelines, which is available on Spire's internal website, provides more information about sanctions and anti-boycott laws.

8. Insider Trading

Under federal and state securities laws, it is illegal to trade in the securities of a company while in possession of material non-public information about that company. Because you will have knowledge of specific confidential information that is not disclosed outside Spire which will constitute material non-public information, trading in Spire's securities or in the securities of those companies with which we do business could constitute insider trading and could violate the law, as could giving material non-public information to others who trade on that information. It is your responsibility to comply with these laws and not to share material non-public information. We have also adopted an Insider Trading Policy with which you must comply. For more information about insider trading laws, please reference our Insider Trading Policy, which can be found on Spire's internal website.

9. Special Government Contracting Requirements



A special set of laws and principles apply when Spire does business with the United States Government (“**USG**”), whether through contracts, grants, cooperative agreements, or other transactions, and whether directly as a prime contractor or indirectly as a subcontractor or supplier (collectively, “**USG Contracts**”). USG Contracts impose significantly broader and more complex legal and contractual obligations on Spire than commercial contracts. The consequences of violating these obligations can be quite severe, including civil and criminal fines or penalties. Accordingly, Spire employees must understand and comply with all obligations that apply to Spire by virtue of its status as a USG contractor. Please refer to the U.S. Government Contracting Policy for further information.

G. Compliance and Reporting

1. Seeking Guidance

You are encouraged to seek guidance from supervisors, managers or other appropriate Company employees when in doubt about the best course of action to take in a particular situation. In most instances and unless stated otherwise in this Code, questions regarding this Code should be brought to the attention of the Chief Compliance Officer (compliance@spire.com).

2. Reporting Violations

If you know of or suspect a violation of this Code, or of applicable laws and regulations (including complaints or concerns about accounting, internal accounting controls, or auditing matters), you must report it immediately to the Compliance Department (compliance@spire.com). The failure to report a suspected Code violation is itself a violation of the Code and may result in disciplinary action up to and including termination. You should be prepared to describe the suspected violation in as much detail as possible, when you believe the violation occurred, and who you believe was involved. See the Whistleblower Policy for information about making anonymous reports.

All reports will be kept confidential, to the extent practical, except where disclosure is required to investigate a report or mandated by law. Spire does not permit retaliation of any kind for good faith reports of violations or possible violations.

3. Investigations

Reported violations will be promptly and thoroughly investigated. It is imperative that the person reporting the violation not conduct an investigation on their own. You are expected to cooperate fully with any appropriately authorized investigation, whether internal or external, into reported violations. You should never withhold, tamper with, or fail to communicate relevant information in connection with an appropriately authorized investigation.

In addition, you are expected to maintain and safeguard the confidentiality of an investigation to the extent possible, except as otherwise provided below or by applicable law. Making false statements to or otherwise misleading internal or external auditors, investigators, legal counsel, Company representatives, regulators, other governmental entities may be grounds for immediate termination of employment or other relationship with Spire and also be a criminal act that can result in severe penalties.

4. Violations



Violations of this Code may result in disciplinary action, up to and including termination. Moreover, employees or officers who direct or approve of any conduct in violation of this Code, or who have knowledge of such conduct but do not immediately report it, may also be subject to disciplinary action, up to and including termination of employment. A director who violates this Code or directs or approves conduct in violation of this Code shall be subject to action as determined by the Board.

Furthermore, violations of some provisions of this Code are illegal and may subject you to civil and criminal liability.

5. Non-Retaliation

Spire will not retaliate and strictly prohibits retaliation against anyone who, in good faith, reports a suspected violation of this Code or who refuse to engage in conduct they reasonably believe to be inconsistent with this Code. Spire also prohibits retaliation against employees who assist or cooperate in investigations. Retaliation of any kind may result in disciplinary action up to and including termination of employment.

6. Disclosure

Nothing contained in this Code or any other Company agreement or policy is intended to prohibit or restrict you from disclosing confidential information to any government, regulatory, or self-regulatory agency including under Section 21F of the Securities and Exchange Act of 1934, as amended, and the rules thereunder.

H. Waivers of this Code

Any amendment or waiver of any provision of this Code must be approved in writing by the Board or, if appropriate, its delegate(s), and promptly disclosed pursuant to applicable laws and regulations. Any waiver or modification of this Code for a Senior Financial Officer will be promptly disclosed to stockholders if and as required by applicable law or the rules of the applicable stock exchange.

I. Amendment

Spire is continuously reviewing and updating its policies, and therefore reserves the right to amend this Code at any time for any reason.