

Evolv Technology Supplier Code of Responsible Business Conduct

Our commitment to helping the world thrive.

Evolv Technology Holdings, Inc. and its subsidiaries (“Evolv,” “we” or “our”) are strongly committed to observing the highest ethical standards in all its procurement activities. As such, this Supplier Code of Responsible Business Conduct (the “Code” or “Supplier Code of Responsible Business Conduct”) for Evolv’s direct suppliers (“Suppliers”) is intended to provide a clear summary of Evolv’s expectations for Suppliers, helping ensure that internationally recognized procurement ethics are followed. Evolv has adopted this Code in its own operations and strongly urges Suppliers to familiarize themselves with this Code to ensure successful working relations with Evolv. Evolv expects Suppliers to regard this Code as a total supply chain initiative and to establish expectations for their next tier suppliers that are no less stringent than the expectations set forth in this Code.

Our Guiding Principles

Evolv’s five Guiding Principles apply to all of our employees; they provide the foundation for both our culture and our operations. Our Supplier Code of Responsible Business Conduct enlists our Suppliers in following these same principles. We believe this joint commitment to ethical conduct and integrity is a strong foundation for trusted business relationships that create shared value.

1. Treat People with Dignity and Respect

As a responsible company, we expect our Suppliers to respect the human rights of workers, and to treat them with dignity and respect.

Regarding forced labor, we expect our Suppliers to:

- Prohibit forced labor in any form. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.
- Provide all workers with a written employment agreement in a language the worker can understand, that contains a description of terms and conditions of employment.
- Ensure all work is voluntary, and permit workers to leave work at any time or terminate their employment without penalty if reasonable notice is given.

Regarding young workers, we expect our Suppliers to:

- Never use child labor in any stage of manufacturing. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.



- Prohibit workers under the age of 18 (Young Workers) from performing work that is likely to jeopardize their health or safety, including night shifts and overtime.
- Implement an appropriate mechanism to verify the age of workers.
- Provide appropriate support and training to all student workers.
- In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.
- Assist and remediate in the event child labor is identified.

Regarding working hours, we expect our Suppliers to:

- Ensure working hours do not exceed the maximum set by local law.
- Limit working hours to 60 hours per week for non-exempt employees, including overtime, except in emergencies or unusual situations.
- Permit workers to take at least one day off every seven days.

Regarding wages and benefits, we expect our Suppliers to:

- Meet or exceed all legal requirements for compensation, benefits, and working conditions.
- Compensate for overtime at pay rates greater than regular hourly rates.
- Never deduct from wages as a disciplinary measure.
- Provide workers with a timely and understandable wage statement for each pay period.
- Engage temporary, dispatch, and outsourced labor in compliance with applicable laws.

Regarding humane treatment, we expect our Suppliers to:

- Commit to a respectful workplace that is free of unlawful harassment, bullying, and discrimination.
- Adopt disciplinary policies and/or procedures in support of the above commitment.
- Provide reasonable accommodation to workers for religious practices and disability.
- Prohibit medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

Regarding freedom of association and collective bargaining, we expect our Suppliers to:

- Encourage open communication and direct engagement between workers and management to resolve workplace and compensation issues.



- Permit workers and/or their representatives to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.
- Respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, permit workers to elect and join alternate lawful forms of worker representations.

2. Commit to Health & Safety

In alignment with Evolv's mission to help make the world safer, Evolv expects all Suppliers to prioritize the health and safety of their workers in all aspects of their operations.

Evolv believes that in addition to minimizing the incidence of work-related injuries and illnesses, a safe and healthy working environment enhances the quality of products and services, the consistency of production and worker retention and morale. For these reasons, Evolv expects our Suppliers to:

- Provide safe and healthy working conditions at all operations, including providing workers with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with health and safety hazards.
- Adopt and implement emergency plans and response procedures.
- Adopt procedures and systems designed to prevent, track, and report occupational injury and illness. This includes permitting workers to remove themselves from imminent harm without fear of retaliation.
- Provide workers with appropriate workplace health and safety information and training in a language the worker can understand for all identified workplace hazards that workers are likely to be exposed to. Such information shall be readily accessible in the workplace.
- Encourage workers to raise any health and safety concerns without retaliation.

3. Protect the Environment

Evolv recognizes that environmental responsibility is integral to producing world-class products.

Evolv expects its Suppliers to undertake reasonable efforts to identify environmental impacts and minimize adverse effects on the community, environment, and natural resources, while



safeguarding the public health and safety. Evolv Suppliers should:

- Strive to reduce environmental impact such as minimizing greenhouse gas emissions, minimizing waste and using resources efficiently.
- Help protect water resources by minimizing use of water in their operations, avoiding contamination from their operations, and reducing the impact on the water resources of the surrounding communities.
- Adhere to applicable laws and regulations regarding the prohibition or restriction of certain substances in products and manufacturing, including labeling for recycling and disposal.
- Work with Evolv to implement sustainable processes and correct problems to drive continuous improvement.

4. Empower Ethical Excellence & Integrity

Evolv seeks business relationships based on trust, transparency, and mutual accountability.

To meet social responsibilities and to achieve success in the marketplace, Suppliers and their agents shall uphold the highest standards of ethics. Evolv expects Suppliers to:

- Demonstrate the highest standards of integrity in all business interactions, and to strictly prohibit any and all forms of bribery, corruption, extortion, and embezzlement.
- Prohibit the offering and acceptance of bribes or other means of obtaining undue or improper advantage. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.
- Monitor and adopt enforcement procedures to ensure compliance with anticorruption laws.
- Perform all business dealings transparently and accurately reflect the same on Supplier's books and records. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.
- Commit to respecting all intellectual property rights and safeguarding the information of customers, suppliers, and business partners.
- Uphold standards of fair business, advertising, and competition.
- Adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, gold, and cobalt in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organization for Economic Co-operation and Development



(OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

- Commit to protecting the reasonable privacy expectations of personal information of everyone the Supplier does business with, including suppliers, customers, consumers, visitors screened by Evolv products, and employees.
- Comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

5. Ensure Compliance and Pursue Improvement

Evolv expects all Suppliers to not only comply with applicable laws and the standards of this Code, but also embrace a culture of continuous improvement.

Our goal of trusted partnership

It is our goal to build trust-based relationships with ethical suppliers who follow these five Guiding Principles. We expect our Suppliers to cooperate with our reasonable requests for information, certifications, and/or audit access. When there is a concern, our practice is to cooperatively work with our Suppliers. We may be able to help identify possible improvements. However, when an issue cannot be corrected or a Supplier is unwilling to engage, we reserve the right to end our relationship, in addition to any other remedies that are available to Evolv pursuant to any agreement between the Supplier and Evolv.

Evolv expects Suppliers to establish a process to communicate the expectations set forth in this Code to their suppliers and to monitor supplier compliance with this Code.

By working closely with our Suppliers, we believe we can achieve mutual success while helping communities and the wider world thrive.

Suppliers are required to report any conduct or business practices that could constitute a violation of this Code. Violations shall be reported by either:

- Contacting the Supplier's Evolv representative; or
- Sending an email to compliance@evolvtechnology.com.

Getting in touch with Evolv quickly helps to prevent problems and correct any that have already occurred. We handle all reports promptly, fairly, and as confidentially as possible.

