

## SPEAK UP POLICY

Effective: 6/1/2023

Policy Owner: Rachel Roy, [compliance@evolvtechnology.com](mailto:compliance@evolvtechnology.com)

### SCOPE

This Policy applies to all employees, workers, self-employed individuals, officers, board members, volunteers and trainees who conduct business on behalf of Evolv Technologies Holdings, Inc., including those of all wholly owned subsidiaries, joint ventures, or acquired entities. Country-specific and other jurisdictional requirements will take precedence when appropriate. To the extent there are conflicts between this policy and any local policy, this policy governs unless the local policy is stricter as required by local laws or regulations. Failure to comply with this Policy may result in disciplinary action up to and including termination, subject to local laws.

### PURPOSE

Evolv Technologies Holdings, Inc. (together with its subsidiaries, the “Company”) is committed to conducting all our business with integrity and in compliance with all laws. This includes avoiding conflicts of interest, prohibiting bribery, fraud, or other corrupt conduct, treating others with respect, making full and accurate financial disclosures, and maintaining its books and records in compliance with all applicable laws, rules, and regulations. Evolv’s [Code of Business Conduct and Ethics](#) and related policies set the foundation for acceptable behavior in all our business dealings.

The Company recognizes that from time to time there may be things that go wrong, or an individual may see room for improvement. Speaking up when you need help understanding or following a policy, asking questions, and reporting potentially inappropriate behavior is the responsibility of all employees and part of a healthy culture. The quicker we know, the quicker we can take corrective measures. The Company encourages anyone, including employees, independent contractors, third parties, customers, and business partners to “Speak Up” if something doesn’t seem right or they suspect a violation of Evolv’s Code, policies, or the law. Evolv does not tolerate retaliation against individuals who raise concerns in good faith.

**The term “good faith” means with no malicious intent or dishonesty.**

This policy governs the channels for reporting concerns, and the receipt, retention, and treatment of questions or concerns (“reports”) related to any suspected violation of Evolv policies or the law, including regarding the Company’s accounting, internal accounting controls or auditing matters.

### POLICY

You are encouraged to discuss all questions and concerns with your immediate supervisor or other managers within Evolv without fear of retaliation and with confidence the matter will be kept as confidential as possible. You are required to speak up if you suspect someone you work with, work for, or contract with is violating Evolv’s Code of Business Conduct and Ethics, our Company policies, or the law. You are also required to understand your obligations as explained in this Policy, make good-faith reports, and cooperate fully with investigations.

Examples of possible concerns include, but are not limited to:

- Unethical, dishonest, or illegal behavior
- Bribery or attempts to inappropriately influence government and other decision-makers
- Conflicts of Interest
- Human rights violations
- Money laundering

- Anti-Competitive behavior
- Disclosure or misuse of confidential information
- Fraud or abuse of Company resources
- Discrimination, harassment, retaliation, bullying, or any other inappropriate behavior in violation of an Evolv policy
- Fraud against investors, securities fraud, mail or wire fraud, bank fraud or fraudulent statements to the U.S. Securities and Exchange Commission (“SEC”) or the investing public
- Violations of SEC rules and regulations or any other laws applicable to the Company’s financial accounting, maintenance of financial books and records, internal accounting controls and financial statement reviews or audits
- Fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement of the Company
- Significant deficiencies in or noncompliance with the Company’s internal accounting controls
- Misrepresentations or false statements regarding a matter contained in the financial records, financial reports, or audit reports of the Company
- Deviation from the full and fair reporting of the Company’s financial condition
- Environmental, health and safety issues, including product safety issues
- Retaliation against individuals speaking up in good faith

## When to Speak Up

Anytime you suspect a violation of the Evolv Code of Business Conduct and Ethics, the law or any Evolv policy, you should contact the Legal Department or the Ethics Helpline immediately. You do not need to be sure of your suspicions or have “proof” before speaking up and you should not attempt to investigate the concern yourself.

All individuals making reports are asked to provide as much detail and supporting information as possible about their concerns to assist the investigative process. It is the policy of the Company to treat concerns about any suspected violation of Evolv policies or the law, seriously, objectively, and expeditiously; and to be fair to those who speak up.

**When in doubt, speak up.**

The reporting channels described in this Policy should not be used for:

- Emergency situations that present an immediate physical risk – contact local authorities and emergency services; then advise your immediate manager of the situation.
- General questions related to your employment, such as questions regarding benefits, payroll/tax, compensation, or equity - contact HR for assistance.

## How to Report a Concern

The Company has established several ways to make an inquiry or report a concern, including, where legally permitted, the option for anonymity.

You may speak up directly to:

- Your manager or any member of management
- Human Resources
- Legal
- Finance
- Internal Audit
- Chief Ethics & Compliance Officer
- The Compliance Team at [compliance@evolvtechnology.com](mailto:compliance@evolvtechnology.com)
- The Board’s Audit Committee

You may speak up anonymously\* using the Company's Ethics Helpline operated by a third-party, that is available 24 hours a day, 7 days a week:

- By telephone at 833-761-6497 or
- Via the internet at [evolv.ethicspoint.com](https://evolv.ethicspoint.com)

\*Any individual who uses these Ethics Helpline resources may remain anonymous and will not be required to reveal his or her identity in a telephone call or on the anonymous website or mobile app, except in countries that have laws that do not allow for anonymous reporting. While you may remain anonymous in most countries, the Company prefers that you identify yourself so that the Company can obtain all facts and properly investigate allegations.

When reporting a concern, the person receiving the report may ask the following information:

- if the caller is an employee, the business function in which the caller works and, if the caller is a non-employee, where such person is employed or such person's relationship to Evolv;
- any relevant information concerning the suspected misconduct or allegations; and
- the name of the caller (unless an employee decides to remain anonymous, where legally permitted).

Nothing in this Policy prohibits you from reporting potential violations of law or regulations to any governmental authority. If you are located in the European Union, you may also report your concern externally to the competent national authority, either orally or in writing. The reports will then be treated in accordance with the relevant authority's internal process.

## What Happens after a Concern is Reported?

Reports of actual or suspected violations of Evolv's Code, policies, or the law made through Evolv's channels will be provided to the General Counsel and Chief Ethics & Compliance Officer to determine if and how an investigation should proceed. Reports may also be reviewed by the other people within the Legal Department, Human Resources or, if regarding accounting or auditing matters, the Audit Committee and Internal Audit.

- The Chief Ethics & Compliance Officer may investigate it or may assign another employee, outside counsel, advisor, expert or third party to investigate or assist in investigating the concern.
- The selected investigator may be directed to investigate at the direction of or in conjunction with Evolv's legal department or other attorney in the course of the investigation.
- Unless otherwise directed, the person assigned to investigate will conduct an investigation and report their findings to the Chief Ethics & Compliance Officer and General Counsel or the Audit Committee, as applicable.
- The Chief Ethics & Compliance Officer or General Counsel may specify a different procedure for investigating and treating a concern, such as when there is pending litigation.

The Chief Ethics & Compliance Officer, General Counsel or their designees will promptly notify the sender and acknowledge receipt of the report (no later than 7 days following the report). They will also be responsible for following up on the report and liaising with the sender as needed. Feedback will be provided within a reasonable timeframe, i.e., no later than 3 months following the acknowledgment of receipt.

Please learn more about what to expect if you are contacted as part of an investigation: [What to Expect During an Evolv Investigation](#). [Please learn more about what to expect when using the Ethics Helpline](#)

Questions that are not concerns of suspected misconduct submitted through any of the channels will be directed to the appropriate subject matter experts to provide support directly to the reporter.

## Protecting Confidentiality and Anonymity

Evolv will protect the confidentiality and anonymity (where legally permitted) of any individual who reports a concern or participates in an investigation, and any third party mentioned in the report to the fullest extent possible, consistent with the need to adequately investigate issues raised.

## Reporting and Disclosure of Outcomes

Periodically, the Chief Ethics & Compliance Officer or General Counsel may submit a report to the Audit Committee or Evolv Leadership, that summarizes reports made within a specified time period.

All reports and records associated with reported concerns are considered confidential information and access will be restricted.

## **Evolv Prohibits Retaliation Against those who Speak Up**

Evolv strictly prohibits retaliation, or attempts to retaliate, against those who speak up in good faith about possible violations of our Code, our policies and procedures, or the law. Evolv also strictly prohibits any form of intimidation or retaliation against those who cooperate with an investigation concerning a report. This prohibition applies to individuals who help reporters make reports (i.e., facilitators), and third persons connected with reporters who could suffer retaliation as a result of said connection, such as colleagues or relatives, as well as legal entities that the reporting individual owns, works for, or is otherwise connected with in a work-related context.

The Company urges any employee that believes that they have been subjected to retaliation due to submitting a concern, to immediately report the issue to the Chief Ethics & Compliance Officer, Human Resources, an executive officer of the Company, or any supervisor.

## **U.S. Federal Contractor Employee Whistleblower Rights**

Employees working on U.S. Government contracts are protected under federal law from retaliation for making certain disclosures related to government contracts. Consistent with 41 U.S.C. § 4712 and Federal Acquisition Regulation (FAR) 3.900–3.905, employees may disclose information they reasonably believe evidences:

- Gross mismanagement of a Government contract
- Gross waste of Government funds
- Abuse of authority relating to a Government contract
- A violation of law, rule, or regulation related to a Government contract
- A substantial or specific danger to public health or safety

These disclosures may be made to a Government official, including an Inspector General, a contracting officer, or a law enforcement agency. Retaliation is strictly prohibited. Employees will not be discharged, demoted, or otherwise discriminated against for making a protected disclosure in good faith. This policy applies to all employees and subcontractor personnel working on covered Government contracts.

## **REVISION HISTORY**

<b>Changes</b>	<b>Effective Date</b>	<b>Approved By</b>
Updated helpline contact information to new provider	July 1, 2025	Rachel Roy, General Counsel
Updated with Fed whistleblower protection language required by the FAR	April 20, 2026	Rachel Roy, General Counsel

