



CODE OF ETHICS BETA TECHNOLOGIES, INC.

Last Revised June 11, 2026

The Board of Directors (the “*Board*”) of BETA Technologies, Inc. (together with its subsidiaries, “*BETA*”) has adopted this Code of Ethics (the “*Code*”) in order to deter wrongdoing and promote:

1. honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
2. BETA’s commitment to safety, quality and compliance;
3. full, fair, accurate, timely and understandable disclosure in reports and documents that BETA files with, or submits to, the Securities and Exchange Commission (the “*SEC*”) and in other public communications made by BETA;
4. compliance with applicable governmental laws, rules and regulations;
5. protection of BETA assets, including corporate opportunities and confidential information;
6. fair dealing practices;
7. the prompt internal reporting of violations of the Code to an appropriate person or persons identified in the Code; and
8. accountability for adherence to the Code.

All directors, officers and employees are required to be familiar with the Code, comply with its provisions and report any suspected violations as described below.

HONEST AND ETHICAL CONDUCT

BETA’s policy is to promote high standards of integrity by conducting its affairs honestly and ethically.

Each director, officer and employee must act with integrity and observe the highest ethical standards of business conduct in their dealings with BETA’s customers, suppliers, partners, service providers, competitors, employees and anyone else with whom they have contact in the course of performing their job.

COMMITMENT TO SAFETY, QUALITY AND COMPLIANCE

Safety is of primary importance in all that BETA does. Directors, officers and employees must comply with applicable safety and quality laws, regulations and standards, as well as BETA policy and procedure. Everyone must incorporate personal and product safety considerations into their work and decision-making and promptly report any safety concerns, hazards, incidents, or



potential non-compliance.

Furthermore, BETA promotes a culture in which safety, quality, and compliance decisions are made with integrity, transparency and for the right reasons. Individuals involved in safety or compliance decisions will exercise independent judgment, free from, and without exerting, undue influence, interference, or pressure.

CONFLICTS OF INTEREST

A conflict of interest occurs when an individual's private interest (or the interests of their family) interferes, or even appears to interfere, with the interests of BETA as a whole. A conflict of interest can arise when an employee, officer or director (or a member of their family) takes actions or has interests that may make it difficult to perform their work for BETA objectively and effectively. Conflicts of interest also arise when an employee, officer or director (or a member of their family) receives improper personal benefits as a result of their position in BETA.

Loans by BETA to, or guarantees by BETA of, obligations of directors, officers, or their family members are of special concern. Loans by BETA to, or guarantees by BETA of, obligations of any director or executive officer are expressly prohibited. This prohibition also applies to family members of any director or executive officer, though de minimis amounts and loans or guarantees made pursuant to BETA-wide programs may be permitted.

Whether or not a conflict of interest exists or will exist can be unclear. Conflicts of interest should be avoided unless specifically authorized as described in the paragraph below.

Persons other than directors and executive officers who have questions about a potential conflict of interest or who become aware of an actual or potential conflict should discuss the matter with, and seek a determination and prior authorization or approval from, their supervisor or the Chief Legal Officer. A supervisor may not authorize or approve conflict of interest matters or make determinations as to whether a problematic conflict of interest exists without first providing the Chief Legal Officer with a written description of the activity and seeking the Chief Legal Officer's written approval. If the supervisor is themselves involved in the potential or actual conflict, the matter should instead be discussed directly with the Chief Legal Officer.

Directors and executive officers must seek determinations and prior authorizations or approvals of potential conflicts of interest exclusively from the Audit Committee of the Board (the "*Audit Committee*").

CORPORATE OPPORTUNITIES

All directors, officers and employees owe a duty to BETA to advance its interests when the opportunity to do so arises. Directors, officers and employees are prohibited from taking for themselves personally (or for the benefit of friends or family members) opportunities that are discovered through the use of BETA property, information or position. Directors, officers and employees may not use BETA property, information or position for personal gain (including for the gain of friends or family members). In addition, no director, officer or employee may compete with BETA.

CONFIDENTIALITY



Directors, officers and employees should maintain the confidentiality of information entrusted to them by BETA or by its customers, suppliers or partners, except when disclosure is authorized or legally mandated or, in certain circumstances, permitted by law. Confidential information includes all non-public information (regardless of its source) that might be of use to BETA's competitors, or harmful to BETA or its customers, suppliers or partners if disclosed.

FAIR DEALING

Each director, officer and employee must deal fairly with BETA's customers, suppliers, competitors, partners, service providers, employees and anyone else with whom they have contact in the course of performing their job. No director, officer or employee should take unfair advantage of anyone through manipulation, concealment, abuse or privileged information, misrepresentation of facts or any other unfair dealing practice.

PROTECTION AND PROPER USE OF BETA ASSETS

All directors, officers and employees should protect BETA's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on BETA's profitability and are prohibited.

All BETA assets should be used only for legitimate business purposes, though de minimis personal use that does not interfere with business purposes may be permitted. Any suspected incident of fraud or theft should be reported for investigation immediately.

The obligation to protect BETA assets includes BETA's proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business and marketing plans, engineering and manufacturing ideas, designs, databases, records and any non-public tools, financial data or reports. Unauthorized use or distribution of this information is prohibited and could also be illegal and result in civil or criminal penalties.

COMPLIANCE

Directors, officers and employees should comply, both in letter and spirit, with all applicable laws, rules and regulations in the cities, states and countries in which BETA operates.

Although not all directors, officers and employees are expected to know the details of all applicable laws, rules and regulations, it is important to know enough to determine when to seek advice from appropriate personnel. Questions about compliance should be addressed to the Legal Department.

Insider trading is unethical, illegal and a violation of BETA's Insider Trading Policy.

DISCLOSURE

BETA's periodic reports and other documents filed with the SEC, including all financial statements and other financial information, must comply with applicable federal securities laws and SEC rules.

Each director, officer and employee who contributes in any way to the preparation or verification of BETA's financial statements and other financial information must ensure that BETA's books,



records and accounts are accurately maintained. Each director, officer and employee must cooperate fully with BETA's accounting and internal audit departments, as well as BETA's independent public accountants and counsel.

Each director, officer and employee who is involved in BETA's disclosure process must:

1. be familiar with and comply with BETA's disclosure controls and procedures and its internal control over financial reporting; and
2. take all necessary steps to ensure that all filings with the SEC and all other public communications about the financial and business condition of BETA provide full, fair, accurate, timely and understandable disclosure.

REPORTING AND INVESTIGATION OF VIOLATIONS

Actions prohibited by this Code involving directors or executive officers must be reported to the Audit Committee.

Actions prohibited by this Code involving anyone other than a director or executive officer must be reported to the reporting person's supervisor or the Chief Legal Officer.

After receiving a report of an alleged prohibited action, the Audit Committee, the Chief Legal Officer or the relevant supervisor must promptly take all appropriate actions necessary to investigate.

All directors, officers and employees are expected to cooperate in any internal investigation of misconduct.

PROHIBITION ON RETALIATION

BETA does not tolerate acts of retaliation against any director, officer or employee who makes a good faith report of known or suspected acts of misconduct or other violations of this Code, and any such retaliation may be a violation of BETA's Whistleblower Policy.

ENFORCEMENT

BETA must ensure prompt and consistent action against violations of this Code.

If, after investigating a report of an alleged prohibited action by a director or executive officer, the Audit Committee determines that a violation of this Code has occurred, the Audit Committee will report such determination to the Board.

If, after investigating a report of an alleged prohibited action by any other person, the relevant supervisor determines that a violation of this Code has occurred, the supervisor will report such determination to the Chief Legal Officer.

Upon receipt of a determination that there has been a violation of this Code, the Board or the Chief Legal Officer will take such preventative or disciplinary action as it deems appropriate, including, but not limited to, reassignment, demotion, dismissal and, in the event of criminal conduct or other serious violations of the law, notification of appropriate governmental authorities.



WAIVERS

The Board or the Audit Committee (in the case of a violation by a director or executive officer) or the Chief Legal Officer (in the case of a violation by any other person) may, in its discretion, waive any violation of this Code.

Any waiver for a director or an executive officer shall be disclosed as required by SEC and NYSE rules.



ACKNOWLEDGMENT OF RECEIPT AND REVIEW¹

I, _____, acknowledge that I have received and read a copy of the BETA Technologies, Inc. Code of Ethics. I understand the contents of the Code and I agree to comply with the policies and procedures set out in the Code.

I understand that I should approach Chief Legal Officer if I have any questions about the Code generally or any questions about reporting a suspected conflict of interest or other violation of the Code.

NAME

PRINTED NAME

DATE

¹ **NTD:** To be managed online. Including for reference only.