

Code of Conduct for Suppliers and Other Trading Partners

Firefly Aerospace is committed to conducting business in an ethical and proper manner. Our employees, officers and directors must conduct themselves in accordance with the Firefly Code of Business Conduct and seek to avoid even the appearance of improper behavior. Copies of our Code of Business Conduct and other policies on ethical conduct can be found at www.fireflyspace.com/ethics (collectively, "Ethical Conduct Policies").

We count on our Suppliers to help us fulfill our mission to design, build and launch safe and high-quality rockets and spacecraft, and deliver the best service to our customers. We seek Suppliers that share our values, and we expect our Suppliers, and any other trading partners involved with the execution of Firefly work (collectively, "Suppliers") to adhere to the principles of our Ethical Conduct Policies and comply with all applicable laws and their contractual obligations with us. Suppliers are expected to cascade these principles to their employees, workers, and their own suppliers and subcontractors.

We assess our Suppliers' compliance with our Ethical Conduct Policies. Violations may jeopardize a Supplier's relationship up to and including termination of the business relationship.

If a Supplier has cause to believe that it or any agent or employee of Firefly Aerospace has behaved improperly, unethically or otherwise violated the Ethical Conduct Policies, we expect the Supplier to report such behavior to the [Firefly Speak Up Helpline](mailto:firefly.ethicspoint.com) at firefly.ethicspoint.com or 1-833-416-6259 or to a senior executive of Firefly Aerospace.

Our Suppliers provide us with High Quality Products and Services, Supported by Accurate Business Records

Quality. Our Suppliers maintain quality assurance processes to identify defects and implement corrective actions and to facilitate the delivery of a product or service whose quality meets or exceeds the contract requirements.

FOD Prevention. Whenever or wherever Foreign Object Debris (FOD) can be entrapped or Foreign Objects (FO) can migrate, our Suppliers ensure that appropriate Foreign Object Damage (FOD) prevention requirements are implemented and flowed down to its subcontractors at every tier.

Counterfeit Parts. Our Suppliers develop, implement, and maintain methods and processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products.

Accurate Records. Our Suppliers accurately record, maintain, and report business documentation, including but not limited to, financial accounts, quality reports, time records, expense reports, and submissions to Firefly Aerospace, the customer or regulatory authorities. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event.

Government Work. Our Suppliers who work on projects where government entities or agencies are involved are expected to understand and follow government contracting rules, regulations, and procedures.

Our Suppliers Respect Human Rights and Treat People with Respect

Human Rights. Our Suppliers respect the human rights of their employees and those in their supply chain; they never use, engage in or support practices that condone the use of forced or indentured labor, or workers subject to any form of compulsion, coercion, deception or other abuse of power; and they comply with all applicable laws and regulations relating to the prevention of slavery, human trafficking, child labor, forced labor and the unethical treatment of people.

No Conflict Minerals. Our Suppliers adopt policies and establish systems to procure tantalum, tin, tungsten, and gold from sources that have been verified as conflict free, free of child and forced labor, and provide supporting data on their supply chain for tantalum, tin, tungsten, and gold to Firefly Aerospace when requested.

Non-Discrimination. Our Suppliers provide equal employment opportunity to employees and applicants for employment without regard to race, ethnicity, religion, color, sex, pregnancy, national origin, age, military veteran status, sexual orientation, marital status, any characteristic protected by state or local law, or mental or physical disability, when the essential functions of the job can be performed with or without reasonable accommodation.

Fair Employment Practices. Our Suppliers comply with applicable laws and regulations governing wages and hours; allow workers to choose freely whether to organize or join associations for the purpose of collective bargaining as provided by local law; and prohibit discrimination, harassment and retaliation.

Privacy. Our Suppliers respect the privacy rights of individuals; safeguard personal information; and ensure compliance with laws and directives providing for the protection, transfer, access and storage of personal information.

Environment, Health & Safety. Our Suppliers comply with applicable environmental laws and regulations; provide workers a safe and healthy workplace; do not adversely affect the environment; and strive to reduce energy, waste and natural resource consumption by implementing conservation and substitution measures.

Drug Free Workplace. Our Suppliers maintain a workplace free from illegal drugs. Such a workplace prohibits the illegal use, possession, sale or distribution of controlled or illegal substances.

Our Suppliers Safeguard Sensitive Information and Intellectual Property and Safeguard their Supply Chain

Sensitive Information. Our Suppliers respect and safeguard the sensitive information, including confidential, proprietary, or controlled information, entrusted to them by Firefly Aerospace, our customers, and other third parties. They adopt policies and establish systems to safeguard such intellectual property and sensitive information against unauthorized disclosure or use, misappropriation, or loss. Information maintained on electronic systems is protected against cyber intrusions and other unauthorized use or access, through appropriate physical and electronic security procedures.

Intellectual Property. Our Suppliers respect the intellectual and other property rights of Firefly Aerospace and third parties, including all patents, trademarks and copyrights. We do not permit our Suppliers to use our name, trademark, photographs, intellectual property or any other information about Firefly Aerospace or our employees on their website or in their media or marketing materials, unless agreed to in writing by Firefly Aerospace.



Supply Chain Security. Our Suppliers implement practices and procedures to ensure the security of their people, property, and other assets, including their supply chain. They are encouraged to participate in (or implement processes consistent with) the Customs-Trade Partnership Against Terrorism initiative of the United States Department of Homeland Security.

Procurement Integrity. Our Suppliers must maintain the integrity of our procurement and acquisition processes. They may not improperly use competitors' confidential or proprietary information for their own benefit and, if they become aware of any such confidential or proprietary information, they must take prompt steps to avoid its improper use and inform Firefly Aerospace as appropriate.

Our Suppliers Do the Right Thing

Fair Dealing. Our Suppliers comply with competition (antitrust) laws in the countries where they operate or sell product or services. They do not co-ordinate market conduct with others in a way that improperly restricts competition.

Ethics; Improper Payments. Our Suppliers uphold the highest standards of integrity in all business interactions; avoid engaging in any corruption, extortion, embezzlement or bribery (including promising, offering, giving or accepting); and comply with all laws and regulations applicable to the conduct of their businesses, including all applicable anti-bribery and anti-corruption laws.

Gifts; Business Courtesies. Firefly Aerospace competes on the merits of our products and services, and we do not use the exchange of business courtesies to gain an unfair competitive advantage. Our Suppliers do the same in the offering or receipt of any gift or business courtesy.

Trade Controls & Customs Matters. Our Suppliers comply with all applicable export and import laws and regulations, and plan for and obtain all necessary authorizations and licenses to ensure timely and compliant delivery of their product and services.

Conflict of Interest. Our Suppliers avoid all conflicts of interest or situations giving the appearance of a conflict of interest in their dealings with Firefly Aerospace. Suppliers must notify Firefly Aerospace of any potential or actual conflicts of interest as soon as they are known.

Reporting Concerns and Non-Retaliation. Our Suppliers encourage and train their employees performing work for Firefly Aerospace to voice concerns, ask questions and seek guidance about matters involving compliance and their business operations. Our Suppliers provide tools for anonymous reporting, where allowed by law, or they may share Firefly Aerospace's Speak Up Helpline as a reporting resource with their employees, workers and their suppliers and subcontractors. Our Suppliers prohibit retaliation and comply with applicable whistleblower laws. If a concern is raised involving Firefly Aerospace, our Supplier is expected to notify us immediately and fully cooperate with any investigation conducted by Firefly Aerospace.

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All Suppliers are expected to self-monitor their compliance with our Ethical Conduct Policies and commit to maintaining a management system designed to ensure compliance with the principles set forth herein and all applicable laws and regulations, to identify and mitigate any operational risks, and to facilitate continuous improvement of the Supplier's business operations.

