



CODE OF CONDUCT

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I. Momentus Commitment

Momentus Inc. (“Momentus” or “Company”) conducts business with the highest standards of ethics and integrity in compliance with all applicable laws, rules, and regulations. This Code of Conduct (“Code”) applies to every business decision and Momentus entities worldwide.

This Code follows the below guiding principles:

1. **Ethics** – Demonstrate honesty and the best ethical standards in business decisions.
2. **Integrity** – Maximize trust by exemplifying strong moral principles.
3. **Respect** – Treat all employees and third parties with respect and courtesy.
4. **Privacy** – Protect all sensitive information.
5. **Compliance** – Ensure all decisions comply with applicable laws and regulations.

Our Vision: A future where humanity is equipped with all it needs to move freely throughout the solar system.

Our Mission: To provide the most efficient in-space transportation powered by deep space resource utilization services and propulsion technologies.

Not all Momentus policies and procedures are in this Code of Conduct and in some cases, it contains a summary of other policies of the Company. Many items covered here may be covered in more detail in other company documents, in which case those documents are controlling. Employees are responsible for their own up-to-date knowledge about Company policies, procedures, benefits, and working conditions. Momentus reserves the right to at any time supplement, revise, revoke, or rescind any part or all of this Code of Conduct or any or all the benefits or policies set forth herein.

Nothing in this Code of Conduct or any other Momentus policy or document limits or prohibits employees from engaging for a lawful purpose in any “Protected Activity.” “Protected Activity” means filing a charge, complaint, or report, or otherwise communicating with or participating in any investigation or proceeding that may be conducted by a state, federal, local, or other governmental agency. In connection with such



Protected Activity, employees are permitted to disclose documents or other information as permitted by law, and without giving notice to, or receiving authorization from, Momentum. In making any such disclosures or communications, employees must take all reasonable precautions to prevent any unauthorized use or disclosure of any information that may constitute Momentum Proprietary Information or Confidential Information (as defined in your Confidential Information and Invention Assignment Agreement (“CIIAA”) and in this Code of Conduct) to any parties other than the relevant government agencies. “Protected Activity” does not include the disclosure of any Momentum attorney-client privileged communications or attorney work product and any such disclosure, without Momentum’s written consent, violates Momentum policy.

Any language in any other document or communication regarding an employee’s right to engage in Protected Activity that in any way could be read as conflicting with, or is contrary to, this paragraph is superseded by the language in these paragraphs. In addition, pursuant to the Defend Trade Secrets Act of 2016, you are notified that an individual will not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that (i) is made in confidence to a federal, state, or local government official (directly or indirectly) or to an attorney solely for the purpose of reporting or investigating a suspected violation of law, or (ii) is made in a complaint or other document filed in a lawsuit or other proceeding, if (and only if) such filing is made under seal. In addition, an individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the individual’s attorney and use the trade secret information in the court proceeding, if the individual files any document containing the trade secret under seal and does not disclose the trade secret, except pursuant to court order.

II. Equal Employment Opportunity

Momentum is an equal opportunity employer and will not discriminate in recruiting, hiring, training, promotion, transfer, discharge, compensation or any other term or condition of employment based on merit and other lawful factors. In accordance with applicable law, the Company prohibits discrimination based on race (including, but not limited to, hair texture and protective hairstyles such as braids, locks, and twists), religious creed, color, national origin, ancestry, physical or mental disability, medical condition, genetic information, marital status (including registered domestic partnership status), sex and gender (including pregnancy, childbirth, lactation, and related medical conditions), gender identity and gender expression (including transgender individuals who are transitioning, have transitioned, or are perceived to be transitioning to the gender with which they identify), age (40 and over), sexual orientation, Civil Air Patrol status, military and veteran status and any other consideration protected by federal, state, or local law (collectively referred to as "Protected Characteristic(s)").

III. Open Door Policy

Here at Momentum, we want to maintain a positive and pleasant environment for all our employees. To help us meet this goal, we have an open-door policy, under which you are

encouraged to report work-related concerns. If something about your job is bothering you, or if you have a question, concern, idea, or problem related to your work, please discuss it with your immediate manager as soon as possible. If for any reason you do not feel comfortable bringing the matter to your manager, feel free to raise the issue with HR, and then to any Company officer. We encourage you to come forward and make your concerns known to the company. We cannot solve the problem if we do not know about it!

IV. Harassment Prohibition

Momentum strictly prohibits harassment based on Protected Characteristics and other factors that shape the creative perspective and professional experience. All harassment is prohibited by this policy and will not be tolerated. The Company is committed to preventing the creation of a hostile environment based on prohibited harassment and will therefore take a proactive approach to preventing and correcting any disrespectful behavior that might, if left unchecked, contribute to a hostile environment. If the Company initiates disciplinary action, up to and including termination of employment, offenders may also be personally liable, in the event of litigation, for damages and attorney's fees and other costs of litigation. This policy protects and applies to all persons involved in the operation of Momentum and prohibits harassment by any employees of Momentum, as well as, consultants, contractors, volunteers, paid and unpaid interns, suppliers, or visitors. If you believe yourself to be a victim of harassment or are aware of harassment you should immediately report the harassment according to the Reporting Procedures described below. If you think you are a victim of harassment, you may discuss the offensive conduct with the offender(s) before reporting it to management but are not required to do so.

V. Reporting Procedures

The Company's reporting procedure is aimed at providing a prompt, thorough, and objective investigation of any complaint, including claims of harassment, discriminatory conduct, and retaliation. Appropriate corrective action, including discipline if deemed appropriate by the Company, will be taken against anyone who the Company determines violated Company policy. All employees must report all violations of policy, even if they have not lost a job or some other economic benefit.

If you believe you have been subject to conduct that violates the Company's policy against harassment or discrimination, or if you are aware of such conduct directed at others, you are required to provide a written or verbal report to your manager or Human Resources. All managers who receive a complaint from any source must report the complaint to Human Resources or Legal before the end of the next business day. The report should include details of the incident(s), the names of individuals involved, the names of any witnesses, direct quotes when relevant, and any documentary evidence (notes, pictures, cartoons, emails, etc.). If, for any reason, you do not feel comfortable discussing the matter with your manager, you may bring the matter to the attention of another management team member. If you feel uncomfortable with any of the above options, you may make a report to our third-party reporting hotline at 844-927-2810 or on the website at <https://secure.ethicspoint.com/domain/media/en/gui/76636/index.html> which can be

done using your name or anonymously. The important thing is to bring the matter to the Company's attention promptly so that any concern of harassment or discrimination can be investigated and addressed appropriately.

All complaints, regardless of the nature of the issue, will be investigated by Human Resources and Legal in a fair, timely, objective, and thorough manner. The investigation will be documented and tracked to ensure reasonable progress of the investigation. All information disclosed during an investigation will remain as confidential as possible, except as necessary to conduct the investigation and take any remedial action, and in accordance with applicable law. All employees have a duty to cooperate in an investigation fully and to the best of their abilities and failing to cooperate or deliberately providing false information during an investigation is grounds for disciplinary action, up to, and including, termination of employment. At the conclusion of its investigation, if the Company determines a violation of policy has occurred, it will act commensurate with the severity of the offense to remediate and be effective to address the current situation and prevent recurrences. This may include disciplinary action against the accused party, up to, and including, termination of employment.

VI. No Retaliation

The law and Momentum policy also prohibit retaliation against any employee or other third party, by any employee or by the Company for using this complaint procedure or for filing, testifying, assisting, or participating in any manner in any report of discrimination or harassment or any investigation, proceeding or hearing conducted by the Company or a federal or state enforcement agency. Any report of retaliatory conduct will be promptly, objectively, and thoroughly investigated in accordance with this procedure. If a complaint of retaliation is substantiated, corrective and/or disciplinary action will be taken as deemed appropriate by the Company, which may include discipline up to an including immediate termination of employment.

VII. Romantic Relationships

Momentum recognizes that certain relationships and conduct in the professional setting can have the potential to compromise, or appear to compromise, the fairness and objectivity of decisions and the discharge of other professional duties. This applies to all employees, regardless of gender or sexual orientation. For the purposes of this policy, "relationship" includes consensual romantic relationships and sexual relations. Non-consensual relationships constitute sexual harassment and are explicitly prohibited.

Entering a relationship with a colleague may cause problems if not handled correctly so before you do:

- Consider any possible conflict of interest before entering a relationship with a coworker.

- Inform Human Resources when you enter a romantic or intimate relationship with a colleague and, if appropriate, we may ask you to sign a consensual relationship agreement.
- Keep discussions of personal issues out of the workplace.
- Maintain professionalism despite the status of the relationship.

Relationships between managers or managers and subordinates are strictly prohibited, including any subordinate in your reporting chain. If such a relationship develops, you must report the relationship to Human Resources and failing to report such a relationship may lead to disciplinary measures up to and including termination of your employment.

If possible, in the event of reported relationship of any type in a reporting chain or within a working group, we will try to separate the parties organizationally to the extent practicable and feasible. If no suitable position is available or if circumstances dictate otherwise, then one or both of the parties may be required to leave Momentum. The decision as to which party will leave may be made by Momentum in its sole discretion. Failure to cooperate to resolve a conflict caused by such relationships, may result in disciplinary measures up to and including termination of your employment.

VIII. Anti-Nepotism

The employment of relatives can cause various problems including but not limited to charges of favoritism, conflicts of interest, and scheduling conflicts that may work to the disadvantage of both Momentum and its employees.

For the purposes of this policy the term “relative” will include the following relationships: relationships established by blood, marriage, or legal action. Examples include the employee’s: spouse, parent, children, sibling, parent-in-law, sibling-in-law, child-in-law, stepparent, stepchild, aunt, uncle, nephew, niece, grandparent, grandchild, or cousin. The term also includes domestic partners (a person with whom the employee’s life is interdependent and who shares a common residence) and the children of an employee’s domestic partner.

It is our goal to avoid creating or maintaining circumstances in which the appearance or possibility of favoritism, conflicts, or management disruptions exist. Momentum may allow existing personal relationships to be maintained or employ individuals with personal relationships to current employees under the following circumstances:

- You and a family member may not work under the supervision of the same manager;
- You may not create a manager/subordinate relationship with a family member;
- You may not supervise or evaluate a family member;
- The relationship will not create an adverse impact on work productivity or performance;
- The relationship may not create an actual or perceived conflict-of-interest;
- You may not audit or review in any manner a family member’s work.

You may not be employed by the Company if a member of your immediate family (spouse, children, parents, grandparents, siblings, stepfamily members, in-law family members) serves on Momentus' Board or any Committee or Council which has authority to review or order personnel actions or wage and salary adjustments which could affect their job.

It is the responsibility of every employee to identify to Human Resources any potential or existing personal relationship which falls under the definitions provided in this section. Employees who fail to disclose personal relationships covered by this policy will be subject to disciplinary action up to and including the termination of employment.

IX. National Security Agreement Confirmation and Commitment; No communications with Investors (defined below)

Momentum signed a National Security Agreement with the US Government on June 8, 2021. Pursuant to that agreement all employees have confirmed that after June 8, 2021, and as a condition of ongoing employment at Momentus that to their knowledge, they do not have and will not have any professional communications with Mikhail Kokorich, Lev Khassis, or any relatives of or companies controlled by either of Mssrs. Kokorich or Khassis, or any of their family members (collectively, the "Investors"). Furthermore, all employees shall immediately report any and all communications, whether or not professional, with any Investors to Legal. Violations of this policy will result in corrective action up to and including immediate termination of employment.

Further information regarding NSA compliance will be circulated as an addendum to this Code of Conduct, to be reviewed and executed by each Momentus employee.

X. Domestic Violence, Sexual Assault, and Stalking Accommodation

You have the right to request help or changes in your workplace to make sure you are safe at work, including requests for time off to secure your safety or get assistance. Momentus will work with you to see what effective, reasonable changes can be made provided they do not cause undue hardship to the business. You may be asked to provide written documentation of the need for the accommodation, but all such information will remain confidential. As provided under applicable law, the Company will not discriminate or retaliate against you for asking for any accommodations or time off under this policy.

XI. Managers

Questions about your job, pay, benefits, relations with your co-workers(s), policies and procedures of Momentus in general should be directed to your manager. Look to your manager for guidance and seek their assistance when you encounter difficulties. Cooperation and communication with your manager will promote a mutually beneficial work environment. Throughout this Code of Conduct, the term manager is used but includes managers, supervisors, or anyone to whom you have a reporting relationship.

You must follow the directions of your manager in the performance of your work duties. Your manager is responsible for directing your work throughout your shift, evaluating your performance, providing instruction and guidance in your job, and taking any disciplinary action that may be necessary though others at Momentum from time to time also may exercise one or more of these responsibilities.

XII. Workplace Conduct

*All safety detailed in this Code of Conduct is in support of the Momentum Safety Manual and Illness and Injury Prevention Program (IIPP). Any conflicts shall be governed by the Momentum Safety Manual and Injury and IIPP.

A. Workplace Safety

The safety, welfare, and security of employees is a primary concern to Momentum. Acts or threats of violence, intimidation, harassment, or coercion which occur during working times, which occur on Company property or at a Company-sponsored event regardless of location, which involve or affect the Company in any manner will not be tolerated. This applies to all persons involved in the operations or business of Company or who interact with Company employees or representatives. Violations of this policy will result in corrective action up to and including immediate termination of employment.

Weapons are not permitted on Company property or at a Company-sponsored event. Please notify Facilities if you become aware of a breach of security or if your identification badge is lost or a security code compromised. If you become aware of a security issue, a workplace hazard, or have an idea for increasing security or safety please let us know. You are responsible for the safety of yourself and others in the workplace.

B. Workplace Violence

Workplace violence is conduct which causes an individual to reasonably fear for their personal safety or the safety of others (such as other employees, family members, or friends) because of severe, offensive, or intimidating conduct. The following are examples of prohibited behavior which will not be tolerated by any employee:

- Any direct or indirect harassing, intimidating, abusive or threatening language, actions, or behavior towards another person, regardless of the relationship of the parties. This includes communications via phone, text, instant messaging, or social media.
- Any direct or indirect plan, threat or act of violence, injury, death, or property damage (including, but not limited to fistfights, wrestling, shoving, or other forms of physical aggression with or without weapons).
- Destruction of or threat of destruction of Company's or another party's property.
- Symbols or gestures that communicate a stated or implied threat.
- Stalking or surveillance.

C. Enforcement of Workplace Safety

If you believe there has been a violation of this policy or the guidelines found in the Momentus Safety Manual, you must report the details of the incident(s) to your manager or another member of management as soon as possible. All such reports will be promptly investigated in accordance with the IIPP found in the Momentus Safety Manual. In addition, the Company retains the discretion to notify law enforcement at any time.

Anyone who violates this policy in any manner, at the Company's discretion, may be removed from the premises as quickly as safety permits and may be required to remain off Company premises pending the outcome of an investigation. When any violation of this policy occurs, the Company will determine the appropriate measure(s) to be taken, which include possible disciplinary action and immediate termination of employment.

In emerging situations, decisions may be needed to prevent a threat from being carried out, a violent act from occurring, or a life-threatening situation from arising or continuing. No Company policy or procedure should be interpreted in a way that prevents those decisions and actions being undertaken, however, do not place yourself in any situation that would compromise your safety or in any way would endanger you, your co-workers, or others. Any victim of workplace violence that involved weapons or personal injury should immediately call 911.

D. Personal Property

Personal property should be kept with you or always secured. Momentus is not responsible for personal property that is lost, stolen, damaged, or destroyed including your personal vehicle or other means of transportation. If you ride a bicycle to work, be sure to securely lock it in the designated space(s). Employees are responsible for providing their own locking devices.

E. Health and Safety in the Workplace and Quality Management

Workplace health and safety is a top priority and is everyone's responsibility and processes developed and controlled within the Company Quality Management System will include measures to ensure safety. Momentus is committed to providing a healthy and safe work environment and protecting employee well-being. In addition, the Company believes that it is in everyone's best interests to develop, implement, and maintain an effective Quality Management System. Momentus has empowered its Director of Quality to be responsible for maintenance and communication of the Quality Management System. The Quality Objectives will be maintained and defined by the Director of Quality.

Employees are encouraged to take an active interest in health, safety, and quality to always perform their work in a safe and secure manner. Employees are responsible and held accountable for following the Company's safety and quality procedures.

F. General Safety Guidelines

The following general guidelines help to prevent accidents and promote a safe working environment:

- Use CAUTION when lifting any item. Remember, lift with your legs, not your back! Employees should always feel comfortable requesting assistance if it is needed, and a 2-person team must handle packaged or heavy items. Use assistive equipment, such as a dolly, when transporting heavy objects.
- Do not use any equipment that you have not been certified to use.
- Observe all safety precautions and/or manufacturer's specifications prescribed for use of equipment. Always consult your manager if in doubt.
- Appropriate cutting tools must be used when opening boxes (i.e., box cutters from approved vendors with self-retracting blades). Other sharp objects including broken glass and knives should always be handled with proper caution.
- All material handling will be in accordance with manufacturer's specifications for loading, unloading, and moving. Materials stacking should not exceed authorized heights as prescribed by management, and no un-banded or non-interlocking materials may be stacked higher than can be safely reached while standing on the ground.
- Work areas should be kept clean and free of obstructions, and other slip, trip, or fall hazards. These include spills, electrical cords, boxes, debris, etc.
- Fire exits and electrical panel boxes must be always kept clear of obstructions.
- When working with substances such as cleaning supplies, employees should always use the product in accordance with the instructions on the label. If you require further information on a product, ask your manager to obtain the Safety Data Sheet for the product.

For more detailed safety guidelines, refer to Momentus' Safety Manual.

G. Smoke and Tobacco Free

Smoking, use of smokeless tobacco, and/or electronic cigarettes are prohibited inside any Company facility or within 20 feet of any door, window, or air intake. You may never smoke near any area where flammable or combustible materials, such as solvents, are used or stored. Other rules regarding smoking may apply depending on your work location. Employees that observe other individuals smoking in the workplace have a right to object and should report the violation to their manager or to another member of management.

H. Drugs and Substance Abuse

Employees are expected to report for work and remain at work in sufficient physical and mental condition to perform their assigned duties, including remaining free from the effects or influence of alcohol and illegal drugs (including the unauthorized use of over the counter and/or prescription drugs). You may not report to work while under the influence of or in an altered state due to the use of alcohol, drugs (legal or illegal), or controlled substances. The possession of illegal drugs or controlled substances on Momentus

property or while you are engaged in any job-related activity, while on or outside of Company property, is not permitted. The use or consumption of alcohol or illegal drugs (including the unauthorized use of over the counter and/or prescription drugs), during work hours or on Company property, is strictly prohibited and may lead to disciplinary action up to and including termination and the involvement of law enforcement. The foregoing restriction does not apply to company-sponsored events where alcohol is served.

However, Momentum may sponsor an event, such as a holiday party or happy hour, where alcoholic beverages are provided. You will not be encouraged or expected to consume alcohol at such events nor is attendance required. Those who do drink alcoholic beverages at such an event must exercise moderation and behave responsibly. At an event, if an employee appears to be impaired, arrangements should be made for the employee to ride home with a designated driver, in a cab, rideshare service, or via public transportation at Company expense. Without regard to reporting relationships, managers should take a leadership role for arranging alternative transportation for employees in this manner.

I. Telephone and Device Use Safety

You are expected to follow applicable local, state, and federal laws and regulations regarding the use of your cell phone when being used for business and in particular failure to use of hands-free devices while driving and where required by law is a violation of Momentum policy. Employees who are charged with traffic violations resulting from the use of cell phones while driving will be solely responsible for all liabilities that arise from such actions and such uses will be operating outside the course and scope of employment. Violations will subject employees to disciplinary action, up to, and including, termination of employment.

J. Hazardous Chemicals

Chemical containers cannot be shipped from the manufacturers or distributors unless they are properly labeled with the identity of the chemical. The label should tell you what chemical is in the container, what hazard that chemical may present, and the name and address of the manufacturer. Labels should not be defaced or removed, and no chemical shipments should be accepted, even on a trial basis, without the proper label. When transferring chemicals from large containers to a smaller container a label should be applied to the new container, unless the product is to be immediately and completely used by the person who transferred the chemical, and they know the new container's content and that the transfer to the new container is appropriate. The basic purpose of labeling requirements is to give an immediate warning of the chemical inside the container and to remind you that more detailed information is available from Safety Data Sheets. If a chemical container has no label, immediately inform your manager so that the contents can be labeled appropriately. Do not use the contents of any container that does not have a label.

The Safety Data Sheet (SDS) for all chemicals should be located where that chemical is stored. Should you have any questions on any of the chemicals on this list, you can request a copy of the SDS for your information. Check with your manager.

Always consider these 3 elements when working with any chemicals. The safe use of chemicals depends on:

1. Recognizing the hazard: Know the product you are using, read the SDS, become familiar with precautions to be taken, and heed warnings by the manufacturer. Use only in accordance with label instructions.
2. Evaluating your use: What you are trying to accomplish with the chemical.
3. Controlling your exposure: Personal protection should be used as recommended, proper ventilation is required, and follow appropriate storage requirements.

The SDS should provide information on chemical exposure threshold limits and routes of entry, as these terms are described below.

Threshold limits - How much of a product you can be exposed to without it being hazardous. Example: fumes from solvents, adhesives, welding, etc. A small amount of fumes inhaled over a short period of time may or may not affect you. A small amount breathed continually for 8 hours a day or a 40-hour week will increase the overall dose and could have ill effects. On the other hand, a large amount of fumes for a few minutes may be irritating and may or may not have lasting effects.

Rule of entry - How chemicals get into our system: inhalation (breathing fumes or vapors), absorption (through skin pores after handling or getting on clothing), and ingestion (swallowing or eating). Though you would not think of eating a chemical product, if you eat lunch, a snack at break time, or smoke a cigarette without washing your hands, you may be eating the chemicals that are on your hands.

Types of Chemicals - Some examples and how they can affect you:

- Corrosives - Such as sulfuric acid (commonly known as battery acid), corrode or eat away at metals and steel and can do the same to your hands and face.
- Irritants - Such as solvents, do as they say, they irritate the skin or membranes and can cause a rash or dermatitis.
- Sensitizers - Such as epoxy and lacquers, affect the nervous system, coordination, muscle control, and cognitive abilities.
- Toxins - Such as carbon monoxide, enter the bloodstream and are carried to the brain and nervous system. In excessive amounts, toxins will shut down systems and organs.
- Carcinogens - Such as asbestos fibers, are proven cancer causing to lungs and cell tissue.

Hazard communication is common sense thinking about what you are doing, informing yourself, preparing for the task, and taking the necessary precautions. What you do not

know CAN HURT YOU. By knowing, checking the SDS, evaluating your use, and controlling your exposure you can make chemical products work for you successfully and safely.

For more information, refer to the Hazard Communication Program in Momentus Safety Manual.

K. Emergency Procedures

All employees must know and understand the procedures for responding to emergencies such as fires, earthquakes, tornadoes, and power failures. Every employee should familiarize themselves with the location of exits and the fire extinguishers in their work location. Employees should evacuate using the nearest safe emergency exit and direct other employees and guests who need assistance. Once outside, employees should report to the assigned assembly area and follow the instructions of emergency response personnel. You and any visitors you have are required to evacuate the building when the emergency fire alarm system is activated. No reentry to the building will be permitted until an official all-clear notification is given. If you feel you need assistance to comply with these procedures notify your manager immediately.

L. Fire Emergency Procedures

The most frequent causes of fires are chemicals, grease, and careless smoking. In these conditions, a major fire can be only three minutes away from the “flashover”. It is vital that you utilize the three major tactics:

RESCUE, CONFINE, AND ALERT!

- First, **RESCUE** anyone in the immediate path of a fire.
- Second, **CONFINE** the fire. Shut doors and/or windows in the room or area where the fire is erupting. This will keep it from spreading into other areas, etc.
- Third, **ALERT**. Utilize your fire alarm system to tell the fire department about the fire.

After you have completed the above steps, only then can you consider fighting the fire. Make sure you use the correct extinguisher for the type of fire that you are fighting. Do not place your safety in jeopardy. If you cannot **RESCUE, CONFINE** or **ALERT** without unreasonable danger or risk, then don't!

For mor information, refer to the Emergency Action and Fire Prevention Plan in Momentus' Safety Manual.

XIII. Confidentiality of Information

In the course of your work as an employee of the Company you will have access to and create confidential, proprietary, and trade secret information of the Company and its

customers, vendors, suppliers, consultants, contractors, or business associates (collectively, “Proprietary Information”). The Company and its customers, suppliers, consultants, contractors, or business associates have developed, compiled, and otherwise obtained this Proprietary Information often at great expense, and that such information has great value to their respective businesses. You must always hold in the strictest confidence and in trust for the sole benefit of the Company, and to the extent it relates to such third parties, its customers, suppliers, partners, consultants, or contractors, each, and all of the Proprietary Information, except to the extent necessary to carry out your duties as an employee of the Company. Any publication or other disclosure of Proprietary Information through literature or speeches or other communication to the public must be approved in advance in writing by an officer of the Company.

The security of Company property is of vital importance to the Company. Momentus property includes not only tangible property, like desks and computers, but also intangible property such as information as outlined in the Confidential Information and Inventions Assignment Agreement (“CIIAA”) which you signed at the start of your employment. All employees must abide by the terms of their CIIAA as a condition of their employment.

Conflict of Interest

You are expected to use your best judgment and to always maintain the highest ethical standards, enable a culture of ethical behavior, and to avoid situations that may create an actual or potential conflict between your personal interests and the interests of Momentus. A conflict of interest may arise in any situation or transactions in which you or a family member has interests or loyalties that compete with, influence, or differ from, the business interests of the Company. Everyone must take all reasonable steps to avoid situations that might involve a conflict of interest or even the perception or appearance of a conflict of interest.

Material existing and/or potential conflicts of interest – including proposed transactions – must be reported in writing to Legal on an ongoing basis and will be reported to the Company Board of Directors. Approval from the Board of Directors may be required prior to entering a materially conflicted business relationship or arrangement. Materiality can be very situational and fact-specific so please contact the Legal department for guidance or if you have any questions.

XIV. Visitors/Tours of Momentus Facilities

The work done at and services done by Momentus are exciting and are sometimes worth showing to nonemployees. Still, some of the work performed at Momentus falls under EAR and ITAR regulations and per those requirements, limits may need to be placed on the escort of visitors (particularly non-US person or otherwise not licensed or authorized persons) within the facilities within which such work is present.

At least 5-7 business days prior to escorting a visitor through these spaces, you must contact Legal at Legal-support@momentus.space for advanced approval of the visit and for any relevant information and training required to conduct a successful tour, including



protocols contained within the Global Trade Compliance Policy. Prior to the visit, the visitor will also be required to sign an NDA and will be subject to an export-control screening and will need to confirm their status as a US person and/or licensure and authorization status. Legal or Facilities will inform you of any restrictions on access at least 48 hours before the day of the tour.

On the day of the visit, visitors will need to sign in via our visitor kiosk located in the front lobby. Visitors must be always accompanied while at the Momentum facilities by a Momentum employee.

XV. Job Duties

Your manager is responsible for defining your job responsibilities and the standards that will be expected from you. Flexibility is important to our success so your job responsibilities may change from time to time during your employment as determined by the Company and your manager. In addition to your regularly assigned job responsibilities and duties, you may be asked to work on special projects or to assist with other work important to the operation of your department or the Company. Your cooperation and assistance in performing additional work is expected. The Company reserves the right, at any time, with or without advance notice, to alter or change job responsibilities, reassign, or transfer job positions or assign additional job responsibilities.

XVI. Outside Employment

Subject to other policies, such as Conflict of Interest and Confidential Information, Momentum has no objection to an employee holding another job (in addition to employment with Momentum) if you can effectively meet the performance standards for your position with Momentum and such outside employment does not have a negative effect on your job with the Company. All employees will be held to the same scheduling demands and standards of performance.

XVII. Appearance

Your personal appearance is an important part of the way you represent Momentum to the public. Customers form an opinion of Momentum from your appearance and attitude. In general, remember to keep it simple, comfortable, neat, and, most importantly, you. Specific jobs may have stricter requirements due to safety and/or responsibilities. Please direct questions to your manager.

XVIII. Use of Momentum Equipment

All Company property – including but not limited to all equipment and resources such as copiers, facsimile machines, computers, laptops, tools, gym, furniture, e-mail, internet access, telephones, and voicemail systems are in place to facilitate effective day-to-day business operations. Employees who lose, misappropriate, or misuse Company property may be personally liable for the repair or replacement of the item to the extent permitted



by law in addition to any disciplinary measures that may be imposed. All Company-owned property including computers, keys, badges, passwords, and credit cards must be returned at the time of termination.

Employees should not have any expectation of privacy with respect to the Company's telecommunications, networking, or information processing systems (including, without limitation, stored computer files, email, instant messaging, and voice messages). Any activity and any files or messages on or using any of those systems may be monitored at any time without notice. Momentus reserves the right, always during or outside business hours and in the presence or absence of the employee, to access and search all offices, work areas, and work assets, for business-related reasons as determined in its sole discretion such as workplace safety or compliance with state or federal laws. Occasional use of Company equipment for non-work purposes or with permission from your manager is allowed so long as such use is consistent with Company policies and does not disrupt your work or Company operations, but such use is subject to this policy and possible disclosures.

In addition, any electronically stored communications that you either send to or receive from others may be intercepted, retrieved, monitored, disclosed, and reviewed in the discretion of the Company, without further notice to you. Destruction or deletion of any computer data or electronically stored material or communications other than as provided for in Company policies is not permitted. All employees should be aware that the Company has software and systems in place that are capable of monitoring and recording all network traffic to and from any computer employees may use. The Company reserves the right to access, review, and copy (deleted or not) and anything accessed through these systems with or without notice to you. In addition, the Company may review Internet and technology systems activity and analyze usage patterns and may choose to publicize this data. Employees should have no expectation of privacy as to their Internet or technology systems usage and should not use these systems for information they wish to keep private.

Employees may access only files, data, or programs that they have permission to enter. Computer software is protected from unauthorized copying and use by federal and state law and third-party contracts that the Company enters and unauthorized copying or use of computer software exposes both the Company and the individual employee to substantial fines and/or imprisonment. Employees may not load personal software onto the Company's computer system and may not copy software from the Company for personal use. Unauthorized review, duplication, dissemination, removal, installation, damage, or alteration of files, passwords, computer systems, or programs or other property of the Company or improper use of information obtained by unauthorized means, may be grounds for disciplinary action up to and including termination of your employment.

XIX. Compliance

A. Global Trade Compliance (EAR/ITAR)

Momentus produces or uses controlled products and services which fall within a variety of regulatory controls of the Export Administration Regulations ("EAR") and the International

Traffic in Arms Regulations (“ITAR”). To ensure compliance with all applicable trade compliance and technology transfer laws, please refer to the information on our compliance duties and the Global Trade Compliance Policy GTC located here. For more detailed questions contact Legal.

B. Foreign Corrupt Practices Act

Momentum has customers all over the global and therefore, complies with the U.S. Foreign Corrupt Practices Act (“FCPA”) and all other international anti-corruption and anti-bribery laws. The FCPA prohibits the offer, payment, or promise to pay or give gifts, benefits, or anything of value, directly or indirectly to officials of foreign governments, foreign political candidates, and public international organizations to obtain an improper business advantage. Other countries have enacted similar restrictions with global reach, such as the United Kingdom’s Bribery Act, that covers both public and private sector employees. Many of our customers are government entities or associated with their local governments in some way, and thus may qualify as “government officials” under the FCPA.

You may not offer or accept bribes or kickbacks and must not participate in or facilitate corrupt activity of any kind. The Company does not allow facilitation payments, or payments to expedite routine matters, to any government or quasi-government official. Payments made by or on behalf of Momentum to foreign officials should always be strictly for services rendered and reasonable given the nature of the services. A bribe can include all things of value including but not limited to money, discounts, gifts, or favors. These types of laws can be complex. If you are not certain about anything concerning your interactions with officials or international companies, please contact Legal for guidance.

C. International Trade Laws and Finance

When considering entering into an agreement with a new international business, you must contact Legal to allow for proper due diligence to be performed. The Company will conduct, on a risk basis, appropriate screening of sanctioned/restricted party lists published by applicable U.S. government authorities (such as the U.S. Office of Foreign Assets Control Specially Designated Nationals and Blocked Persons List or Financial Crimes Enforcement Network’s Section 311 list of institutions of money laundering concern) for concerns or red flags, including but not limited to relevant sanctions or money laundering lists, review for persons subject to asset freezing orders and other restrictive measures, and evaluation of politically exposed persons or senior foreign political official concerns.

D. Accurate Books and Records

All of Momentum’s books, records, accounts, and financial statements must be maintained in reasonable detail, must appropriately reflect Company transactions, and must conform both to legal requirements and to Momentum’s system of internal controls and generally accepted accounting principles (“GAAP”). Company records must be easily accessible and properly protected until their destruction dates. Destruction of Company records prior to this time is strictly prohibited. For all payments and expenses, you must submit

appropriate documentation, like an active agreement for payment of third parties or payment receipts for meals, including business objectives and attendees, and must include appropriate approvals when required.

E. Business-Related Expenses

Employees are entitled to reimbursement for all reasonable business expenses incurred in your positions. Employees must submit reimbursement requests and satisfactory proof of expenses in accordance with Momentus' reimbursement policies, as may be amended from time to time. Please see the Human Resources Department if you have questions about seeking reimbursements.

F. Business Courtesies and Gifts

Building business relationships may appropriately involve giving to and receiving from third parties certain gifts, meals, and entertainment where the items does not exceed \$200US in cash value (collectively "Gifts"). Even so, gift giving and receiving can create a conflict of interest or bias that could be viewed as a bribe. Therefore, Gifts should be made openly and transparently, be reasonable and appropriate to the relationship and local customs, not be intended to place the recipient under any obligation or persuasion and be accurately and contemporaneously reflected in the Company's books and records where required. Gifts of cash, securities, or other cash equivalents not otherwise identified below to any third party are strictly prohibited.

You may give or receive Gifts under the circumstances provided for above. Some examples of acceptable Gifts are:

- Meals, drinks, or hosted parties;
- Tickets to events (but not transportation to or from the event);
- Token holiday gifts and or branded merchandise; and
- Gift cards of nominal value (and in no circumstances over \$200 in value)

The US Government has different rules regarding gift giving and government employees may only receive gifts valued at \$20 or less individually and up to \$50 in value per year from the Company. Modest refreshments and free attendance at widely attended gatherings may also be appropriate and acceptable.

Gift giving must also comply with anti-corruption and anti-kickback laws and all other rules regarding gifts specific to our industry and these guidelines are not meant to override any of those laws. Please contact Legal if you have any questions or concerns about giving or receiving Gifts.

G. Insider Trading



Never buy or sell Momentum securities, including Momentum stock, if you are aware of information that has not been publicly announced and that could have a material effect on the value of the securities. It is illegal and against Momentum policy to give anyone, including friends and family, tips on when to buy or sell securities when aware of material non-public information concerning that security. This applies to decisions to buy or sell Momentum stock or the stock of an Momentum supplier, manufacturer, vendor, or customer, such as cellular network carriers or other channel partners.

Information is material if it would likely be considered important by an investor who is deciding whether to buy or sell a security, or if the information is likely to have a significant effect on the market price of the security. Both positive and negative information may be considered material. Examples of potential material information include financial results, information about new products or significant features, timing of significant product announcements or new product introductions, news of a pending or proposed acquisition or other corporate transaction, significant changes in sources or availability of supplies, changes in dividend policy, significant product defects or modifications, and significant cybersecurity, or other data protection or privacy incidents.

Short sales, transactions that hedge or off set, or are designed to hedge or offset any decrease in the value of Momentum securities and transactions in derivatives of Momentum stock, are always prohibited, including transactions involving prepaid variable forward contracts, equity swaps, collars, options, warrants, puts, calls, or similar instruments related to shares of Momentum stock.

H. Human Trafficking

Momentum is committed to treating everyone in our business and supply chain with dignity and respect, to upholding human rights across our global network of suppliers, and to protecting the planet we all share. Human trafficking and the use of involuntary labor are strictly prohibited in Momentum's supply chain and our own business operations. If you become aware of human trafficking or behavior supporting human trafficking, you must report this activity to Legal or Human Resources as soon as possible. Some Momentum employees who interact with the U.S. government must abide by additional requirements set for government contractors.