

DUTCH BROS INC.

**WHISTLEBLOWER POLICY
FOR ACCOUNTING AND AUDITING MATTERS**

**LAST AMENDED BY AUDIT AND RISK COMMITTEE OF
THE BOARD OF DIRECTORS
DECEMBER 5, 2022**

Dutch Bros Inc. and its consolidated subsidiaries, including Dutch Mafia, LLC (collectively, the “**Company**”) is committed to providing a workplace conducive to open discussion of our business practices and is committed to complying with the laws and regulations to which we are subject. Accordingly, the Company will not tolerate conduct that is in violation of such laws and regulations. In accordance with the provisions of this Whistleblower Policy for Accounting and Auditing Matters (this “**Policy**”), each Company employee, including employees of our subsidiaries, is encouraged to promptly report a good faith complaint regarding accounting or auditing matters. Employees who file reports or provide information without a good faith, reasonable belief in the truth and accuracy of such information are not protected by this Policy and will be subject to disciplinary action. Any other third party, such as vendors, customers, stockholders or competitors also may report, under the procedures provided in this Policy, a good faith complaint regarding accounting or auditing matters. To facilitate the reporting of complaints regarding accounting or auditing matters, the Audit and Risk Committee of our Board of Directors (the “**Audit and Risk Committee**”) has established procedures for the receipt, retention, and treatment of complaints regarding accounting, internal accounting controls, or auditing matters (“**Accounting Matters**”). This Policy is a supplement to the Code of Business Conduct and Ethics (the “**Code**”) and should be read in conjunction with the Code.

SCOPE OF MATTERS COVERED BY POLICY

This Policy covers complaints relating to Accounting Matters, including, without limitation, the following types of conduct:

- fraud, deliberate error or gross negligence, or recklessness in the preparation, evaluation, review, or audit of any financial statements of the Company or any of its direct and indirect subsidiaries;
- fraud, deliberate error or gross negligence, or recklessness in the recording and maintaining of financial records of the Company or any of its direct and indirect subsidiaries;
- violations of the rules and regulations of the U.S. Securities and Exchange Commission (the “**SEC**”) that are related to accounting, internal accounting controls, and auditing matters;
- misrepresentations or false statements to management, regulators, the Company’s outside independent auditors, or others by a senior officer,

accountant or other employee regarding a matter contained in the financial records, financial reports, or audit reports of the Company;

- intentional noncompliance, significant deficiencies, or material weaknesses with the internal and reporting controls of the Company or any of its direct and indirect subsidiaries;
- deviation from full and fair reporting of the Company's results or financial condition; or
- fraud against investors, securities fraud, mail or wire fraud, bank fraud, or fraudulent statements to management, outside auditors, the SEC, or members of the investing public.

Timeliness is critical because, as with all investigations, evidential matter may deteriorate, disappear, or otherwise become harder to discover or less useful as time passes. You are encouraged to provide as much detail as possible regarding dates, times, places, names of people involved in any way, actions or inactions, statements made, or the identity of other evidential matter.

POLICY OF NON-RETALIATION

It is the Company's policy to comply with all applicable laws that protect you against unlawful discrimination or retaliation by us or our agents as a result of your lawfully reporting information regarding, or your participation in, investigations involving Accounting Matters. If you believe you have been subjected to any harassment, threat, demotion, discharge, discrimination, or retaliation by the Company or its agents for reporting complaints regarding Accounting Matters in accordance with this Policy, you may file a complaint with our Chief Legal Officer. If it is determined that you have experienced an improper employment action in violation of this Policy, then we will endeavor to take prompt, appropriate corrective action.

REPORTING COMPLAINTS

The Chief Legal Officer is responsible for administering this Policy. You are encouraged to submit concerns regarding Accounting Matters you believe to be questionable in one of the following ways:

- via electronic mail to the Company's Chief Legal Officer at victoria.tullett@dutchbros.com or legal@dutchbros.com;
- through our online whistleblower reporting system at:
 - https://irdirect.net/BROS/whistleblower_iframe or
 - by calling 1-800-916-7037 and entering company code 2767; or

- if the matter relates to the Chief Legal Officer or a member of the Legal Department, via electronic mail to HRHelp@dutchbros.com or via telephone at 877-899-2767.

We have also established a procedure under which you may anonymously submit complaints regarding Accounting Matters. You may anonymously report these concerns in one of the following ways:

- through our online whistleblower reporting system at
 - https://irdirect.net/BROS/whistleblower_iframe or
 - by calling 1-800-916-7037 and entering company code 2767;
- via regular mail to the following address of the Company:

Dutch Bros Inc.
Attn: Chief Legal Officer
1930 W. Rio Salado Pkwy
Tempe, Arizona 85281; or

- if the matter relates to the Chief Legal Officer or a member of the Legal Department you may make an anonymous report through our online whistleblower reporting system or via regular mail to the Chair of the Audit and Risk Committee at:

Dutch Bros Inc.
Attn: Chair of the Audit and Risk Committee
1930 W. Rio Salado Pkwy
Tempe, Arizona 85281.

You may also submit concerns directly to the SEC or other government agency. If you elect to do this, the Company requests that you submit the complaint to the Company prior to or in connection with submission of a complaint to the SEC or any other governmental agency, so that the Company may properly investigate and remediate the issue.

PROCEDURES FOR RECEIVING AND INVESTIGATING COMPLAINTS

Upon receipt of a complaint, the Chief Legal Officer will determine whether the information alleged in the complaint pertains to an Accounting Matter. Complaints that do not pertain to an Accounting Matter will be forwarded to the appropriate person or department for investigation (e.g. Human Resources), unless the Chief Legal Officer deems other treatment is necessary.

Unless the complaint comes directly to the Audit and Risk Committee, the Chief Legal Officer shall promptly notify the Audit and Risk Committee of all complaints determined to pertain to an Accounting Matter. The Audit and Risk Committee shall determine the planned course of action with respect to the complaint, including determining that an adequate basis exists for

commencing an investigation. The Audit and Risk Committee may direct and oversee any investigation of any such complaints and may also delegate the oversight and investigation of such complaints to the appropriate members of the Company's management.

If appropriate, one or more internal and/or external investigators may be appointed to promptly and fully investigate each viable claim under the direction and oversight of the Audit and Risk Committee or such other persons or committees of the Board of Directors as the Audit and Risk Committee determines to be appropriate under the circumstances.

The Chief Legal Officer will confidentially inform the reporting person (if his or her identity is known) that the complaint has been received and, if applicable, provide him or her with the name of, and contact information for, the investigator assigned to the claim.

Confidentiality of the reporting person will be maintained to the fullest extent possible, consistent with the need to conduct an adequate investigation. In the course of any investigation, the Company may find it necessary to share information with others on a "need to know" basis. If the investigation confirms that a violation has occurred, the Company will promptly take appropriate corrective action with respect to the persons involved, including discipline up to and including termination, and, in appropriate circumstances, referral to governmental authorities. The Company will also take appropriate steps to correct and remedy any violation.

RETENTION OF COMPLAINTS

The Chief Legal Officer will maintain a log of all complaints, tracking their receipt, investigation and resolution, and shall prepare a periodic summary report thereof for the Audit and Risk Committee. Each member of the Audit and Risk Committee and, at the discretion of the Chief Legal Officer, other personnel involved in the investigation of complaints, shall have access to the log. Copies of the log and all documents obtained or created in connection with any investigation will be maintained by the Chief Legal Officer, as reasonably necessary and in compliance with applicable law.

MODIFICATION

The Company may modify this policy at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with applicable laws, rules, and regulations and to accommodate organizational changes.