# A Message from the CEO

NextNav was founded with a bold ambition: to redefine how the world experiences location. We weren't interested in incremental change—we set out to build a new dimension of positioning technology that could unlock possibilities far beyond traditional GPS. Today, that vision is becoming reality. Our technology is powering a new era of 3D geolocation, enabling richer, more precise experiences across public safety, mobility, and commercial applications.

But technology alone doesn't define us. What truly sets NextNav apart is our culture—built on the values we call our **Beacons**:

- Accountability in how we lead and deliver
- Collaboration across teams, partners, and communities
- Transparency in our actions and decisions
- Innovation that challenges convention and drives progress
- Resilience to adapt, grow, and thrive in the face of change

These Beacons guide not only our strategy, but our everyday behavior. They shape how we treat one another, how we engage with customers and partners, and how we navigate complex challenges with integrity and purpose.

This **Code of Conduct** reflects that culture. It outlines the standards we uphold as a team and the commitments we make to each other and to those we serve. It's not just a document—it's a shared understanding of what it means to work at NextNav, and a compass for making decisions that align with our values.

As we continue to grow and lead in this transformative space, I want to thank each of you for your dedication, your talent, and your belief in what we're building. The future of location is being shaped right here—and it's being shaped by you.

If you have questions, thoughts, or feedback as you read through this Code, my door is always open. Let's keep building something extraordinary—together.

#### Thank you,

Mariam

Chief Executive Officer NextNav

# NextNav Code of Business Conduct

At NextNav, integrity is at the heart of how we operate. We're committed to doing business the right way—by acting with honesty, upholding the law, and treating everyone with respect.

**Accountability, transparency, collaboration, innovation, and resilience**—serve as our Beacons, shaping our decisions and driving our culture forward.

To help us stay aligned, we've developed this **Code of Business Conduct** (the "Code"). It's more than a policy—it's a daily compass for making sound decisions and doing what's right, even when no one's watching.

Everyone at NextNav must understand and follow our Code. This requirement applies to our directors, officers, employees, consultants, and independent contractors.

By working with us, you agree to follow this Code. Please read it regularly and check for updates.

Sometimes, we might add new rules or guidelines. If that happens, we expect everyone to follow them too. If there's no specific rule, use your common sense and personal ethics to make good decisions. If you are unsure of what to do, seek guidance from a trusted colleague, your manager, or the Company's Compliance Officer. Our general counsel serves as the Company's Compliance Officer.

In certain circumstances, it may be appropriate to waive a provision of the Code. For directors and executive officers, waivers must be approved by the Board of Directors. All other waivers require the approval of our Compliance Officer. If the Board determines to grant any waiver of this Code for an executive officer or director, the waiver and the reasons for the waiver must be disclosed to shareholders through a press release, or by filing a report with the SEC. No waiver will be given from any provision of this Code which is not permitted under applicable law, rules or regulations. You should be aware that the Company generally will not grant waivers and will do so only when there is a compelling reason to do so.

## Following the Code

We provide supporting policies and training to help you fully understand this code and any related laws and regulations and make sure you are equipped with the knowledge to follow them. These policies can be found in our Bamboo HR Policy repository. A large part of our Code is obeying the law. Everyone is expected to respect and follow all the laws and rules that apply to our company and its business. This includes things like securities laws, stock exchange rules, and insider trading laws.

#### **Asking for Help**

You don't need to memorize all the details of the laws, but you should know when to ask for advice from your supervisor, the Legal Department or others in the Company who may be able to provide guidance on a particular subject. It's important to follow the rules and seek help when you're unsure.

#### **Consequences of Breaking the Code**

Adhering to our Code of Conduct and all applicable laws and regulations is essential. Violations will result in serious consequences, which may include suspension, termination, or legal action. Please be aware that your actions and communications — including emails — may be subject to audit and review during investigations or legal proceedings. Understanding

and following the rules that govern our workplace is not just expected — it's fundamental to maintaining a respectful, lawful, and accountable environment for everyone.

### **Avoiding Conflicts of Interest**

At NextNav, we rely on sound judgment, transparency, and loyalty to our mission. It is therefore essential that you avoid any situation that might interfere with your judgment or responsibilities to NextNav. Such a conflict of interest arises when personal interests—financial, relational, or otherwise—interfere with your ability to act in the best interest of our company. Even the appearance of a conflict can undermine trust and credibility.

While you're encouraged to pursue personal investments, relationships, and outside interests, these must never compromise your professional responsibilities or decision-making at NextNav.

Conflicts can take many forms. Below are common scenarios to watch for:

- **Financial Influence:** Having a financial interest in a vendor, supplier, or competitor that could bias your decisions.
- Outside Employment or Consulting: Working for or advising another company—especially one that competes with or does business with NextNav—without prior approval.
- **Preferential Treatment:** Steering contracts, hiring decisions, or business opportunities toward friends, family members, or personal associates.
- **Use of Confidential Information:** Sharing or using non-public company data (e.g., product plans, financials, customer lists) for personal gain or to benefit others.
- **Gifts and Entertainment:** Accepting gifts, travel, or hospitality from vendors or partners that could influence—or appear to influence—your objectivity.
- **Use of Company Resources:** Using our company's time, equipment, or facilities to run a personal business or support outside ventures.
- **Board Memberships or Investments:** Serving on the board of another organization or investing in a startup that may intersect with NextNav's interests.

#### What to Do If You Suspect a Conflict of Interest

- If you believe a situation may present a conflict of interest, you must disclose it in writing to your manager (unless your manager is involved in the potential conflict) and the Compliance Officer. The Compliance Officer of our company will review the circumstances and determine the appropriate course of action.
- o If you're offered a gift, favor, or opportunity that could create a conflict—or even the perception of one—report it immediately to your supervisor and the Compliance Officer.
- If you or a close family member has a personal or financial interest in a company that does business or competes with NextNav, this must be disclosed—even if you're not directly involved in the relationship.

### **External Opportunities**

Your job is to help our company succeed. If you find a business opportunity related to the Company's work through Company resources, information, or your position, you must offer it to the Company first before you can pursue it yourself or share it with others.

You are not allowed to:

- Take or share any opportunity found through Company resources, information, or your position unless the Board decides not to pursue it.
- Use Company resources, information, or your position for personal gain.
- Compete with the Company without its permission.

If you are an employee (not an officer), consultant, or independent contractor, you can only pursue a Corporate Opportunity if the Compliance Officer gives you written permission. For directors and officers, only the Board or its Audit Committee can give this permission. If the Company decides – in writing - not to pursue a Corporate Opportunity, you can go after it, if you follow this Code.

#### **Insider Trading**

The laws against insider trading of the Company's stock are specific and complex. You may obtain, or come into regular or occasional contact with, information that qualifies as "inside information" under applicable securities laws. Inside information includes material information about the Company that is not available to the public and which would be meaningful when someone is considering making an investment decision with respect to our stock. The use of inside information for personal gain is unethical and unlawful. In all cases, it is your responsibility to comply with all relevant securities laws and regulations. Consequently, all Company personnel are expected to read, understand and comply with the Company's separate Insider Trading Policy.

Any questions regarding insider trading and what may or may not be material nonpublic information can be directed to a member of the Legal Department.

## **Bribery and Corruption**

At our Company, we do not permit or condone bribes, kickbacks, or any other improper payments. No Company personnel or contractors should offer, give, solicit, or receive any money or other item of value for the purpose of obtaining, retaining, or directing business, or bestowing or receiving any kind of favored treatment.

The U.S. Foreign Corrupt Practices Act ("FCPA") specifically prohibits any U.S. individual or business from authorizing, offering, or paying money or anything of value, directly or indirectly, to any foreign official or employee, political party, or candidate for public office for the purpose of obtaining or maintaining business or for any other business advantage. All Company personnel must comply with the Company's Anti-bribery policy.

Gifts of nominal value may be given or received, subject to the limitations described in the Company's Gifts policy.

#### **Fair Competition**

At NextNav, we strive to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information obtained without the owner's consent, or inducing such disclosures by past or present employees or officers of other companies is strictly prohibited.

We believe in respecting the rights of, and dealing fairly with, our suppliers, consultants, competitors, employees, officers, and all other individuals with whom we conduct business. Taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice is not acceptable.

## **Financial Integrity/Business Records**

We're committed to keeping clear and accurate business records. These records should honestly reflect what's happening in our company and follow all laws, accounting rules, and our own policies. Having good records helps us make smart decisions and meet reporting requirements.

Never put anything false or misleading in our records. Managers need to make sure we have proper controls in place to protect our assets and report finances correctly. Please inform our Chief Financial Officer about any accounting adjustments that depart from accepted accounting principles as well as any significant off-balance-sheet transactions, arrangements, obligations, or relationships with other companies or individuals that could impact our financial condition, operations, liquidity, capital expenditures, or revenues and expenses.

Always allow audits to be done thoroughly and without interference.

In addition, follow our records retention policies and comply with all laws regarding records preservation. Retain all records related to any legal matters, such as litigation or investigations, as advised by the Legal Department. Failure to comply with such record retention requirements can result in serious legal consequences and disciplinary action.

#### **Workplace Conduct**

We value the contributions of every team member and are committed to maintaining a workplace where everyone is treated with dignity and respect. We strive to create a positive environment where employees can perform their duties without fear of harassment or discrimination. Discrimination based on race, ethnicity, color, sex, gender identity, sexual orientation, national origin, ancestry, disability, religion, or any other protected status is strictly prohibited. Additionally, we do not tolerate retaliation against employees who report such activities in good faith.

Our hiring and employee management decisions are based on qualifications, experience, performance, and other appropriate factors. We encourage diversity of viewpoints and are dedicated to fostering an inclusive and accepting work environment. For more information, please refer to our Americans with Disabilities Act and Equal Employment Opportunity Policies.

## **Protecting Company Assets**

We all have a responsibility to protect our company's assets and ensure their efficient use. Theft, carelessness, and waste directly impact our profitability. All of our company's assets should be used for legitimate business purposes and not for non-company business, although incidental personal use may be permitted with your supervisor's permission.

Protecting our company's assets also includes safeguarding our proprietary information. This encompasses intellectual property such as trade secrets, trademarks, and copyrights, as well as business and marketing plans, technology development ideas, designs, databases, records, and any nonpublic financial data or reports. Unauthorized use or distribution of such information is strictly prohibited.

Our company reserves the right to monitor all electronic and telephonic communication. Remember, all intellectual property you create in your work for our company, as well as all records and files you create on the job, belong to our company.

### Speak Up: Making Ethical Decisions and Raising Concerns

The Company expects you to make ethical decisions in line with this Code and to report any concerns about behavior that doesn't comply with it. If you become aware of any potential misconduct related to this Code, other Company policies, or any laws or regulations, you should contact your manager. However, if you prefer not to go to your supervisor, you can discuss your concern with a member of the Legal Department, a Human Resources representative, or another trusted manager.

If you wish to leave an anonymous message, you can do so by calling our Ethics Hotline or using our dedicated Ethics and Compliance Reporting Form on our website. All submissions will be forwarded to the Compliance Officer for review. Please note that it may be difficult to conduct a thorough investigation if you submit a report anonymously, so you are encouraged to provide your contact information. Whether you identify yourself or remain anonymous, your concern will be kept strictly confidential to the extent reasonably possible and as required by law.

For concerns about questionable accounting matters, financial controls, financial reporting, or similar issues, you may contact the Audit Committee of the Board directly. In addition, our General Counsel is the responsible Compliance Officer under our Code, and you should always feel free to contact the Compliance Officer with any questions or concerns.

Compliance Officer	
	E-Mail: ethics@nextnav.com Phone: 1-571-765-3637
Compliance Reporting Form on Website and Ethics	Phone: 1-408-400-7855  https://ir.nextnav.com/governance/Ethics- and-Compliance/default.aspx  Confidential and anonymous if you choose
Audit Committee	E-Mail: auditcommittee@nextnav.com

All concerns will be taken seriously by the Company and, when appropriate, the Company will fully investigate an allegation. This may include talking to any individuals directly involved, as well as others who may have pertinent information. You are expected to cooperate fully with internal investigations of

wrongdoing or misconduct, and failure to do so will lead to disciplinary action, up to and including termination. You must also maintain the confidentiality of any investigation unless specifically authorized by the Compliance Officer to disclose such information. The Company's document retention policies strictly prohibit the destruction or alteration of documentation with the intent to obstruct any pending or threatened investigation or proceeding.

If any investigation suggests a violation of the Code of Conduct has occurred, the Company will take appropriate action based on the circumstances. If it is determined that a person is responsible for a Code violation, they will be subject to disciplinary action up to, and including, termination of employment and, in appropriate cases, civil action or referral for criminal prosecution. Appropriate action may also be taken to deter any future Code violations.

The Company will not tolerate any retaliation against any Company personnel who, in good faith, report a possible violation of this Code, a law, rule, regulation, or Company policy. "In good faith" means providing honest, complete, and accurate information, even if it later proves to be unsubstantiated or a mistake. Anyone who participates in retaliatory conduct will be subject to disciplinary action up to and including termination of employment. If you have engaged in the activity in question, the fact that you reported the incident will be given appropriate consideration in any resulting disciplinary action. Failure to report wrongdoing of which you have knowledge may be a basis for disciplinary action.

## **Manager Responsibility**

Managers are expected to role model NextNav's values, make ethical decisions, escalate concerns as appropriate, and hold themselves and others accountable to do the same.

Managers are also expected to create an open environment that empowers their teams to speak up and feel comfortable asking questions.

(As amended, November 5, 2025)

#### **NEXTNAV INC.**

#### CODE OF CONDUCT AND ETHICS ACKNOWLEDGMENT

I hereby acknowledge that I have received, read, understand and will comply with the NextNav Inc. Code of Conduct and Ethics.

I will seek guidance from and raise concerns about possible violations of the Code of Conduct and Ethics, in accordance with the terms thereof, with my supervisor, NextNav Inc.'s Compliance Officer, or through other channels identified in the Code, as applicable.

I understand that my agreement to comply with the Code of Conduct and Ethics does not constitute a contract of employment or service.

Please sign here:	
Print Name:	
Date:	

# Beacons of NextNav

# Accountability

Take ownership of your responsibilities, decisions, and outcomes. Partner with others throughout the company and hold each other accountable to drive results for NextNav's mission.

- Follow through on commitments and meeting deadlines.
- Admit mistakes and propose solutions.
- Take initiative to solve problems without being asked.
- Be reliable and consistent in delivering results.
- Ask questions like, "What do you need from me to meet your commitment or deadline?"

# Collaboration

Success comes from everyone working together toward our common vision, turning individual efforts into collective achievements. See beyond your immediate role to identify where your work intersects with others. Actively seek opportunities to generate value through these connections.

- Actively seek input and diverse perspectives.
- Support colleagues, offering ideas, information, resources, and help when needed.
- Speak up. Contribute constructively to team discussions and projects.
- Break down silos. Build bridges to create shared solutions.
- Support each other's growth and success.
- Be open to "tough" dialog. Allow others to speak "their" truth.

# Transparency

Be open, honest, and clear in communications and decision-making processes.

- Share information proactively and timely. Keep others informed, not only of progress and challenges, but also share ideas and information that could help others be more efficient and effective.
- Provide context for decisions and change.
- Be direct in feedback while maintaining respect.
- Be upfront about mistakes and course corrections. Be willing to say, "I don't know" or "I need help."
- Be willing to speak up and challenge the status quo. Trust that people embrace well-intended feedback, can handle the truth, and want to help you succeed.

# **Innovation**

Continuously seek new and better ways to solve problems and create value. Innovation is creative problem-solving, focused on driving results. Innovation is universal—not just for technical roles.

- Look for better ways to do things and suggest improvements.
- Stay curious and open to new ideas and approaches.
- Encourage and build upon others' ideas.
- Transform challenges into opportunities. Take ownership of the problem and think creatively of solutions.
- Take initiative to identify a better approach when the current practice becomes outdated.

# Resilience

Adapt and persevere through challenges while maintaining effectiveness and a positive outlook. Resilience means emerging stronger from challenges—adapting to obstacles while staying focused on long-term goals.

- Maintain composure under pressure.
- Bounce back from setbacks with constructive solutions.
- · Adjust strategies when faced with obstacles.
- Support team morale during difficult periods.
- View challenges as opportunities for growth.
- Try different ways to get something done.