

Government and Law Enforcement Request Policy

Effective: 5/14/2024

SCOPE

This Policy applies to all employees, officers, board members, and third parties who conduct business on behalf of Evolv Technologies Holdings, Inc. including those of all wholly owned subsidiaries, joint ventures, or acquired entities. Country-specific and other jurisdictional requirements will take precedence when appropriate. To the extent there are conflicts amongst this and any local policy, this policy governs unless the local policy is more strict as required by local laws or regulations. Failure to comply with this Policy may result in disciplinary action up to and including termination, subject to local laws.

PURPOSE

At Evolv Technologies Holdings, Inc. (“Evolv”), we value the privacy and security of our customers and their data. Therefore, we have taken precautions designed to ensure that we are safeguarding the information entrusted to us by our customers from any unlawful access or intrusions. This policy was created to provide greater transparency regarding the guidelines used by Evolv to determine how and when we will process demands received from law enforcement, national security, and other regulatory bodies (“Government”) for information about our customers, their employees, and/or their visitors (“Customer Information”).

In addition, it is important to note that while this policy is not specifically intended to address requests for Customer Information arising from private or commercial disputes, Evolv will, to the extent applicable, take the same precautions specified herein for such requests.

POLICY

Upon receipt of a Government request for Customer Information, Evolv takes the following steps into consideration before responding:

- **Subject.** Wherever possible, Evolv believes that the Government should first seek to obtain the information that they are seeking directly from the customer or end user who is the subject of the investigation before requesting such Information from Evolv.
- **Authority.** Evolv will only provide Customer Information if the Government has appropriate authority under applicable law to request such information. Absent a valid warrant, subpoena, court order, equivalent legal process, or emergency situation, it is Evolv’s position not to provide Customer Information to the Government.
- **Scope.** Wherever possible, Evolv will seek to ensure that any request for Customer Information is limited to a clear and reasonable scope about a specific customer account, request additional context if the nature of the investigation is not clear, and may push back on the request for other reasons. In the event Evolv does provide information, it will be the minimum amount of information required to comply with the demand.
- **Notice.** Except in circumstances where Evolv has been advised by the Government not to notify, is prohibited from doing so, or there is a clear indication of illegal conduct or risk of harm, Evolv will notify the customer of a request before disclosing any Customer Information so that the customer may seek available legal remedies.

Information Governments Must Provide

Government officials are asked to ensure that any requests for Customer Information be reasonable in scope and narrowly tailored to request only the information needed to complete their investigation. To help us respond in an effective and timely manner, please provide as much of the following information as possible:

- Agency name
- Agent name and badge/identification number
- Business email address
- Business phone number, including any extension
- Business address
- Brief description of the nature of inquiry
- Where applicable, relevant Evolv Customer name and location.
- Any relevant attachments (for example, subpoena or warrant).

Where to Submit a Request

Evolv accepts Government requests via an online form available at <https://forms.office.com/r/smVspD69Js>

While we agree to accept requests by this method, neither Evolv nor our customers waive any legal rights based on this accommodation.

International Requests

All Government requests must be issued pursuant to applicable laws and made through official channels (e.g., executed order, Government e-mail address, etc.). In addition, requests must be made under appropriate legal basis, as determined by Evolv.

We will review all international Government requests on a country-by-country and case-by-case basis in order to consider and balance our local legal obligations against our commitments to promote users' safety and privacy. We may choose to respond differently to requests from different countries where these commitments conflict with local law.

REPORTING CONCERNS

All employees are responsible for complying with this policy and reporting any suspected violation of this Policy, the law, or the Evolv Code of Business Conduct and Ethics. Any person with a concern can make a report using the Company's Ethics Helpline that is available 24 hours a day, 7 days a week, by telephone at 833-770-2416 or via the Internet at <https://www.whistleblowerservices.com/evolv>. The Ethics Helpline is operated by a third-party vendor. Any employee or third party who uses these Ethics Helpline resources may remain anonymous and will not be required to reveal his or her identity in a telephone call or on the anonymous website or mobile app, except in countries that have laws that do not allow for anonymous reporting. If you are located in the UK or in the EU, or your Concern relates to an incident that took place in the UK or in the EU, while you may remain anonymous, the Company prefers that you identify yourself so that the Company can obtain all facts and properly investigate allegations. More information about how, when, and what to expect when reporting concerns may be found in Evolv's [Speak Up Policy](#).

The Company will not discipline, discriminate against, or retaliate against any person who reports a concern in good faith and will not tolerate any such action. It will abide by all laws that prohibit retaliation against employees who lawfully submit complaints under these procedures. Reports of suspected violations will be kept as confidential as possible, consistent with local laws and the need to conduct an investigation.

REVISION HISTORY

Changes	Effective Date	Approved By