

RELATED PERSON TRANSACTIONS POLICY

Policy Statement

The Board of Directors (the “**Board**”) of Firefly Aerospace Inc. (the “**Company**”) recognizes that certain transactions present a heightened risk of conflicts of interest or the perception thereof, and has established this Related Person Transaction Policy (“**Policy**”) to provide a framework for the review and oversight of all Interested Transactions, as defined below. This Policy supplements our Conflict of Interest Policy.

Who Is Affected By This Policy

This Policy applies to all Related Persons, as defined below, and employees of Company tasked with assisting with the identification of Related Person Transactions, as detailed below.

Procedures and Responsibilities

1. Definitions

An “**Interested Transaction**” is any transaction, arrangement or relationship or series of similar transactions, arrangements or relationships (including the incurrence or issuance of any indebtedness or the guarantee of indebtedness) in which (1) the aggregate amount involved will or may be reasonably expected to exceed \$120,000 in any fiscal year, (2) the Company or any of its subsidiaries is a participant, and (3) any Related Person has or will have a direct or indirect interest (other than solely as a result of being a Director or a less than ten percent beneficial owner of another entity). Interested Transactions also include any material amendment or modification to an existing Interested Transaction.

A “**Related Person**” is any person who is or was (since the beginning of the last fiscal year for which the Company has filed an Annual Report on Form 10-K and proxy statement, even if such person does not presently serve in that role) (1) an Executive Officer, Director or nominee for election as a Director of the Company, (2) a greater than five percent beneficial owner of the Company’s stock, or (3) an immediate family member of any of the foregoing individuals or entities identified in (1) or (2) of this paragraph; and “**Immediate Family Member**” includes a person’s spouse, parents, stepparents, children, stepchildren, siblings, mothers- and fathers-in-law, sons- and daughters-in-law, and brothers- and sisters-in-law and anyone residing in such person’s home (other than a tenant or employee).

“**Committee**” means the Audit Committee of the Board.

“**Director**” refers to a member of the Board.

“**Executive Officer**” means the Company’s Chief Executive Officer, Chief Financial Officer, Chief Accounting Officer, General Counsel, any vice president in charge of a principal business unit or function, and any other officer or person who performs policy-making functions for the Company.

2. Identification of Related Persons

Directors and Executive Officers (including individuals nominated for election for Director or proposed for election for Executive Officer positions) are expected to:

- Complete a questionnaire designed to collect information needed to identify Related Persons at least annually (or as soon as reasonably practicable for individuals nominated or proposed

for election for Director or Executive Officer positions) with such questionnaire collecting the following information (1) a list of his or her Immediate Family Members, (2) for each person listed, and in the case of a Director, for the Director, the person's employer and job title, (3) for each person listed and the Director or Executive Officer, each firm, company or other entity in which such person is a director, general partner or principal or in a similar position or in which such person has a ten percent or greater beneficial ownership interest, and (4) for each person listed and the Director or Executive Officer, each charitable or non-profit organization for which the person is actively involved in fundraising or otherwise serves as a director, trustee or in a similar capacity; and

- Promptly notify the Company's General Counsel of any changes to questionnaire responses (e.g., any changes to Immediate Family Members or employment or charitable relationships).

The Company's General Counsel is expected to:

- Maintain a comprehensive list of Related Persons ("**Related Persons List**");
- Update the Related Persons List as needed, but at least annually;
- Distribute relevant portions of the Related Persons List (and any updates thereof) to (1) the relevant Directors, Executive Officers or nominees, and (2) the departments responsible for the Company's (a) purchases and sales of goods and services, (b) hiring activities, (c) accounts payable and accounts receivable, and (d) charitable contributions, in each case, to allow recipients to carry out the procedures for the notification, review, and approval of Interested Transactions set forth below; and
- Conduct reasonable efforts to obtain, for those who are beneficial owners of more than five percent of any class of the Company's voting securities (1) if the person is an individual, the same information as is requested of Directors and Executive Officers under this Policy, and (2) if the person is a firm, company or other entity, a list of the principals or executive officers of the firm, company or entity.

3. Procedures to Review Interested Transactions

Prior to entering into, or materially amending or modifying, any transaction that may be an Interested Transaction, the facts and circumstances of the proposed Interested Transaction shall be reported to the Company's General Counsel, and the General Counsel will undertake an evaluation of the Interested Transaction. If that evaluation indicates that the Interested Transaction would require the Committee's approval, the General Counsel will report the Interested Transaction, together with a summary of material facts, to the Committee. The Committee shall review the material facts of all Interested Transactions that require the Committee's approval and either approve or disapprove of the entry into the Interested Transaction, subject to the exceptions described below. If advance Committee approval of an Interested Transaction is not feasible, then the Interested Transaction shall be considered and, if the Committee determines it to be appropriate, ratified at the Committee's next regularly scheduled meeting. In determining whether to approve or ratify an Interested Transaction, the Committee will take into account, as it deems appropriate for the circumstances, the factors listed under Section 4 below (Standards for Review).

Each Director and Executive Officer of the Company shall complete a questionnaire at least annually, which questionnaire is designed to elicit information about any existing or potential Interested Transactions. In the event the Company's Chief Executive Officer, Chief Financial Officer or General Counsel becomes aware of an Interested Transaction that was not previously approved or ratified under this Policy, such officer shall promptly notify the Chair of the

Committee, and the Committee or, if it is not practicable for the Company to wait for the entire Committee to consider the matter, the Chair of the Committee, shall consider in accordance with this Policy whether the Interested Transaction should be ratified or rescinded or other action should be taken. The Chair of the Committee shall report to the Committee at the next Committee meeting any actions taken under this Policy pursuant to the authority delegated in this paragraph.

The Committee has reviewed the Interested Transactions described below in the section entitled "Standing Pre- Approval for Certain Interested Transactions" and determined that each of the Interested Transactions described therein shall be deemed to be pre-approved or ratified (as applicable) by the Committee under the terms of this Policy, unless specifically determined otherwise by the Committee. A summary of each new Interested Transaction deemed pre-approved pursuant to clause (c) or (d) under Section 5 below (Standing Pre-Approval for Certain Interested Transactions) and each new Interested Transaction pre-approved by the Chair of the Committee in accordance with the previous paragraph shall be provided to the Committee for its review at the next Committee meeting.

No Director shall participate in any discussion or approval of an Interested Transaction for which he or she is a Related Person, except that the Director shall provide all material information concerning the Interested Transaction to the Committee. If, in light of any abstentions, less than a majority of the Committee is qualified to approve an Interested Transaction, the Committee will submit the Interested Transaction for review by the independent directors of the Board, who shall follow the procedures set forth in this Policy as it relates to the Standards for Review of such Interested Transaction.

If an Interested Transaction will be ongoing, the Committee may establish guidelines for the Company's management to follow in its ongoing dealings with the Related Person. Thereafter, the Committee, on at least an annual basis, shall review and assess ongoing relationships with the Related Person to ensure that they are in compliance with the Committee's guidelines and that the Interested Transaction remains appropriate.

Additionally, in the event that an Interested Transaction involving a member of the Board may constitute an actual or potential director conflict of interest, the General Counsel shall notify the Chair of the Committee of such Interested Transaction.

4. Standards for Review

An Interested Transaction reviewed under this Policy will be considered approved or ratified if it is authorized by the Committee or the Chair of the Committee, as applicable, in accordance with the standards set forth in this Policy after full disclosure of the Related Person's interests in the transaction. As appropriate for the circumstances, the Committee or the Chair of the Committee, as applicable, shall review and consider:

- the nature and extent of the Related Person's interest in the Interested Transaction;
- the approximate dollar value of the amount involved in the Interested Transaction;
- the approximate dollar value of the amount of the Related Person's interest in the transaction without regard to the amount of any profit or loss;
- whether the transaction was undertaken in the ordinary course of business of the Company;
- whether the Interested Transaction was initiated by the Company or the Related Person;

- the material terms of the transaction, including whether the transaction with the Related Person is proposed to be, or was, entered into on terms no less favorable to the Company than terms that could have been reached with an unrelated third party;
- the business purpose of, and the potential benefits to the Company of, the Interested Transaction;
- the availability of other sources of comparable products or services,
- whether the Interested Transaction would impair the independence of an outside director;
- required public disclosure, if any; and
- any other information regarding the Interested Transaction or the Related Person in the context of the proposed transaction that would be material to the Committee's decision, in its business judgment, in light of the circumstances of the particular transaction.

The Committee will review all relevant material information available to it about the Interested Transaction. The Committee, or the Chair of the Committee, as applicable, may approve or ratify the Interested Transaction only if the Committee, or the Chair of the Committee, as applicable, determines in good faith that, under all of the circumstances, the transaction is just and reasonable as to the Company. The Committee, in its sole discretion, may impose such conditions as it deems appropriate on the Company or the Related Person in connection with approval of the Interested Transaction.

The review, approval or ratification of a transaction, arrangement or relationship pursuant to this Policy does not necessarily imply that such transaction, arrangement or relationship is required to be disclosed under Item 404(a) of Regulation S-K promulgated by the Securities and Exchange Commission (the "SEC").

5. Standing Pre-Approval for Certain Interested Transactions

The Committee has reviewed the types of Interested Transactions described below and determined that each of the following Interested Transactions shall be deemed to be pre-approved by the Committee, even if the aggregate amount involved will exceed \$120,000, unless otherwise specifically determined by the Committee.

- Employment of executive officers. Any employment by the Company of an Executive Officer of the Company or any of its subsidiaries and the related compensation if (1) the related compensation is reported in the Company's proxy statement, (2) the Executive Officer is not an Immediate Family Member of another Executive Officer, Director or a five percent owner of the Company, and the related compensation would be reported in the Company's proxy statement if the Executive Officer was a "named executive officer," and the Company's Compensation Committee recommended that the Board approve such compensation, or (3) the transaction involves the recovery of erroneously awarded compensation computed as provided by the rules of the SEC and applicable listing standards that is reported in the Company's proxy statement.
- Director compensation. Any compensation paid to a director if the compensation is consistent with the Company's director compensation policies and is required to be reported in the Company's proxy statement under Item 402 of Regulation S-K.
- Certain transactions with other companies. Any transaction with another firm, company or entity at which a Related Person's only relationship is (1) as an employee (other than an

executive officer or director) if the aggregate amount involved does not exceed \$200,000 or five percent, whichever is more, of that firm's, company's or entity's annual revenues, (2) as a beneficial owner of less than ten percent, together with their Immediate Family Members, or (3) in the case of partnership, as a limited partner, if the limited partner, together with his or her Immediate Family Members, holds an interest of less than ten percent and the limited partner is not a general partner and does not hold another position in the partnership.

- d. Certain charitable contributions. Any charitable contribution, grant or endowment by the Company to a charitable organization, foundation or university at which a Related Person's only relationship is as an employee (other than an executive officer or director), if the aggregate amount involved does not exceed the greater of \$200,000, or five percent of the charitable organization's total annual receipts.
- e. Transactions where all stockholders receive proportional benefits. Any transaction where the Related Person's interest arises solely from the ownership of the Company's common stock and all holders of the Company's common stock received the same benefit on a pro rata basis (e.g., dividends).

Disclosure

All Interested Transactions that are required to be disclosed in the Company's filings with the SEC, as required by the Securities Act of 1933, as amended, and the Securities Exchange Act of 1934, as amended, and related rules and regulations, shall be so disclosed in accordance with such laws, rules and regulations.

The material features of this Policy shall be disclosed in the Company's Annual Report on Form 10-K or in the Company's proxy statement, as required by applicable laws, rules and regulations.

Firefly Document:	Related Person Transactions Policy
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