

**LANZATECH GLOBAL, INC.  
WHISTLEBLOWER POLICY**

**Approved on 8 February 2023**

If an employee reasonably believes that the Company or any of its directors, officers or employees or other persons, in each case, acting on behalf of the Company, have violated any applicable laws, regulations or policies, the employee should immediately report any such potential violation to the employee's supervisor. If an employee is not comfortable speaking with his or her supervisor or is not satisfied with his or her supervisor's response, the employee may report the matter to anyone in management whom the employee is comfortable approaching. Alternatively, the employee can raise their complaint anonymously via the Company's independent, third-party hotline (the "Company Hotline"). The Company Hotline (1-833-433-1319) is available for reporting employee concerns. In addition, employees may submit reports via email to <https://www.whistleblowerservices.com/lanzatech>.

### **1. PURPOSE**

LanzaTech Global, Inc. (together with its subsidiaries, the "**Company**") requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All employees and representatives of the Company must practice honesty and integrity in fulfilling their responsibilities and must comply with all applicable laws and regulations. Unlawful activity of any kind is prohibited.

### **2. REPORTING RESPONSIBILITY**

It is the responsibility of all directors, officers and employees consultants and contractors working on a temporary basis for the Company to comply with all laws, regulations and operating policies, including the Company's Code of Conduct and Ethics, and to report violations or suspected violations thereof in accordance with this Whistleblower Policy (the "**Policy**").

### **3. REPORTING PROCEDURE**

The following procedures have been established and approved by the Board of Directors (the "**Board**") for the submission by employees of reports of alleged violations and the treatment of those reports. A summary of these reporting procedures follows this discussion in Appendix A.

If an employee reasonably believes that the Company or any of its directors, officers or employees or other persons, in each case, acting on behalf of the Company, have violated any applicable laws, regulations or policies, the employee should immediately report any such potential violation to the employee's supervisor. If an employee is not comfortable speaking with his or her supervisor or is not satisfied with his or her supervisor's response, the employee may report the matter to anyone in management whom the employee is comfortable approaching. Alternatively, the employee can raise their complaint anonymously via the Company's independent, third-party hotline. The Company Hotline (1-833-433-1319) is available for reporting employee concerns. In addition, employees may submit reports via email to <https://www.whistleblowerservices.com/lanzatech>.

The Company has designated a Compliance Officer who is responsible for administering this Policy, including investigating and resolving all concerns and reported complaints received pursuant to

this Policy. Supervisors and management are required to report suspected violations to the Compliance Officer. If the employee is not satisfied or is uncomfortable with the reporting channels described above, the employee may contact the Compliance Officer directly or raise their complaint anonymously via the Company Hotline. The Company's Compliance Officer is the General Counsel, or such other person that the Chief Executive Officer may designate from time to time.

Complaints or concerns regarding officers, directors or the Compliance Officer may be directed to the Chief Executive Officer of the Company. If a complaint involves both the Chief Executive Officer and an officer, director or the Compliance Officer, then the concern may be directed to the Chair of the Audit Committee. Complaints concerning financial impropriety should be simultaneously reported to the Compliance Officer and the Chair of the Audit Committee.

To allow for proper assessment, the report should be factual rather than speculative, and should provide as much specific information as possible, including names, dates, places, and events that took place. Both oral and written reports will both be considered.

Reports may be submitted anonymously via the Company Hotline if the employee desires. All reports of possible violations, whether or not submitted anonymously, will be kept confidential to the extent possible. In some instances, however, it may be impossible to keep an employee's identity confidential because of the demands of conducting a thorough investigation or certain legal requirements.

#### **4. ADMINISTRATION OF THE COMPANY HOTLINE**

- The Company's relationship with the external third-party provider is managed and overseen by the Company's General Counsel and Compliance Officer.
- The Ethics Hotline is answered by interview specialists employed by third-party provider and is operational 24-hours a day, 365 days a year. Submissions made via the internet can also be made at any time.
- The third-party provider always has multi-lingual interview specialists available.
- Except as set forth herein, all calls/submissions are confidential, and individuals do not have to give their names.
- An interview specialist will not pressure you to provide your name if you choose to remain anonymous or may, depending on your location, even strongly encourage you not to provide your name.
- An interview specialist will ask for details about your concerns and will document what you tell him or her in an incident report.
- Because the Company is a multinational corporation with multiple locations you are encouraged to provide as many details as you can. This will help to ensure that the incident is properly investigated and resolved.
- Individuals submitting anonymous reports will be asked to follow-up with the third-party provider through the Company Hotline at an appropriate time following their initial submission. At that time, individuals may be asked additional questions or be asked for additional information.
- All individuals submitting reports will be given a report number to reference in subsequent interactions with the third-party provider.

## **5. INVESTIGATION OF COMPLAINTS**

Upon receipt of a complaint, the Compliance Officer shall determine, in their reasonable judgment, whether a reasonable basis exists for commencing an investigation into the complaint. The Company's outside legal counsel may be consulted for this purpose. Other parties may become involved in the investigation based on their responsibility or expertise.

The investigation of complaints should be prompt. Unless the complaint is made anonymously, the determination of the Compliance Officer will be communicated to the employee who brought the complaint, to relevant management and to the Board, as appropriate.

The Audit Committee of the Board shall address all reported complaints regarding accounting and auditing practices. The Compliance Officer will promptly notify the Audit Committee of such complaints and will work with the Audit Committee until the matter is resolved. Appropriate corrective action will be taken if warranted by the investigation.

## **6. NO RETALIATION**

The Company encourages individuals to report possible violations in good faith and cooperate in the investigation of reported violations. The Company will not discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against any employee because of communications made in good faith under this Policy. Any act of retaliation should be reported immediately and will be disciplined appropriately. This Policy is intended to encourage and enable employees and others to raise serious concerns within the Company in good faith prior to seeking resolution outside the Company.

However, employees who file reports or provide evidence which they know to be false or without a reasonable belief in the truth and accuracy of such information will not be protected by the above policy statement and may be subject to disciplinary action, up to and including termination.

## **7. RETENTION OF COMPLAINTS AND DOCUMENTS**

All written statements, along with the results of any investigations relating thereto, shall be retained by the Company in accordance with the Company's Records Retention Policy.

## **8. COMPLIANCE WITH THIS POLICY**

All directors, officers and other employees must follow the procedures outlined in this Policy and cooperate with any investigation initiated pursuant to it. Adhering to this Policy is a condition of employment or Board service, as applicable. The Company must have the opportunity to investigate and remedy any alleged violations of applicable laws and regulations or Company policies, and each director, officer and other employee must ensure that the Company has an opportunity to undertake such an investigation.

## Appendix A: Summary of Whistleblower Reporting Procedures

### Step 1: Reporting to Your Supervisor, Management or the Compliance Officer

- An employee should immediately report any potential violation to the employee's supervisor
- An employee may also report the matter to anyone in management, to the Compliance Officer, or through the Company Hotline

*Complaints concerning financial impropriety should be reported to the Compliance Officer and the Chair of the Audit Committee*



### Step 2: Supervisor and Management Reporting to Compliance Officer

- Supervisors and management are required to report suspected violations to the Compliance Officer



### Step 3: Review by Compliance Officer

- The Compliance Officer is responsible for investigating and resolving all concerns and reported complaints received



### Step 5: Compliance Officer Notifies Senior Management

- Notification to the Head of People of reports relating to employment and human resources

- Notification to the Chair of the Audit Committee of reports relating to financial impropriety

### *Reports Concerning Senior Company Personnel*

- Complaints or concerns regarding officers, directors or the Compliance Officer may be directed to the Chief Executive Officer

- Complaints involving the CEO and an officer, director or the Compliance Officer may be directed to the Chair of the Audit Committee