## ASTRA SPACE, INC. CORPORATE COMMUNICATIONS POLICY

As adopted June 30, 2021

1. <u>Introduction</u>. Astra Space, Inc. (the "<u>Company</u>") is committed to fair disclosure of information about the Company, consistent with all applicable legal and regulatory requirements. This Corporate Communications Policy (this "<u>Policy</u>") is designed to comply with the Securities and Exchange Commission's (the "<u>SEC</u>") Regulation Fair Disclosure ("<u>Regulation</u> FD").

The Company's General Counsel and Chief Financial Officer shall serve as the Company's Compliance Officers (the "Compliance Officers") for the purposes of this Policy, in consultation with the Chief Executive Officer as deemed necessary. The Compliance Officers or the Chief Executive Officer may designate another employee to be responsible for administration of this Policy.

Under Regulation FD, publicly traded companies may only disclose information to investors through a broad, non-exclusionary means of distribution in order to promote fairness and create a level playing field for all investors. Specifically, Regulation FD prohibits the selective disclosure of material nonpublic information (whether written or oral) to the following persons specified in Rule 100(b)(1) of Regulation FD (the "Enumerated Persons"):

- brokers or dealers or persons associated with them, including investment analysts;
- investment advisers, certain institutional investment managers and their associated persons;
- investment companies, hedge funds and their affiliated persons; and
- any security holder of the Company, including employees, under circumstances in which it is reasonably foreseeable that such security holder would purchase or sell the Company's securities on the basis of the information.

This Policy applies to all employees, officers and directors of the Company and its subsidiaries. The Company may also determine that other persons should be subject to this Policy, such as contractors or consultants who have access to material nonpublic information. Any such other persons will be notified by the Compliance Officers. It is your obligation to understand and comply with this Policy.

This Policy should be read in conjunction with the Company's Insider Trading Policy, which sets forth the Company's guidelines with respect to insider trading and provides guidance to help Company personnel avoid violations of the insider trading laws.

Should you have any questions regarding this Policy, please contact the Compliance Officers.

2. <u>Company Policy</u>. Neither the Company nor any employee or other person acting on the Company's behalf may make any disclosure of material nonpublic information about the Company to any Enumerated Persons, unless the Company also simultaneously discloses such

information to the public. However, the following disclosures are exempt from Regulation FD and this Policy: (1) those made to persons who owe a duty of trust or confidence to the company (e.g., lawyers, bankers and accountants); (2) those made to persons who expressly agree to maintain the information in confidence (e.g., lenders who have signed a confidentiality agreement); and (3) certain specified disclosures made in connection with certain registered securities offerings, as specified in Regulation FD.

Information is material if there is a substantial likelihood that a reasonable investor would consider it important in deciding whether to buy, hold or sell a security. Any information that could reasonably be expected to affect the price of the security is material. Examples of potentially material information are included in Section 9.1 of this Policy.

The initial disclosure of material information by the Company shall be made through a press release or other broad, non-exclusionary means of distribution that is reasonably designed to provide all members of the investment public with an equal opportunity to access simultaneously the material information.

If the Company learns that it, or any person acting on its behalf, has unintentionally disclosed material nonpublic information to any Enumerated Person, the Company shall publicly disseminate the information as soon as reasonably practicable, but in no event after the later of (i) 24 hours or (ii) the commencement of the next day's trading on the Nasdaq Stock Market. If you believe that disclosure of material nonpublic information about the Company may have occurred unintentionally, immediately notify the Compliance Officers.

3. <u>Authorized Spokespersons</u>. The only individuals authorized to speak on behalf of the Company to Enumerated Persons (the "<u>Authorized Spokespersons</u>") are the Chief Executive Officer, Chief Financial Officer, Chief Business Officer and the General Counsel.

In appropriate cases, an Authorized Spokesperson may designate others to respond to inquiries regarding specific areas of interest or speak on behalf of the Company so long as such communications are in compliance with this Policy. Employees, officers and directors who are not Authorized Spokespersons must not respond under any circumstances to inquiries from the investment community unless specifically asked to do so by an Authorized Spokesperson. All such inquiries should be promptly referred to an Authorized Spokesperson.

4. Procedures for Dissemination of Material Nonpublic Information. Any time an Authorized Spokesperson determines to disclose or discuss nonpublic Company information with anyone who is or might be an Enumerated Person, the Authorized Spokesperson should consult with the Compliance Officers and other departments as appropriate to determine whether the information is material. If information to be disclosed is determined to be material, unless otherwise authorized by the Compliance Officers, the information may be disclosed to the Enumerated Person if it is also disclosed through a press release, Current Report on Form 8-K or a conference call and/or webcast in advance or simultaneously. If public disclosure is to be disclosed in a conference call and/or webcast, the public must be given adequate advance notice thereof, which must include an adequate description of the type of information to be disclosed and the means of accessing it. Any such public disclosure must be reviewed with the Compliance Officers.

In addition, if the Company's Authorized Spokespersons publicly announces that the Company's corporate website or other internet postings have been designated as a Regulation FD compliant channel, the Company may post material nonpublic information on that website or through that internet channel. The Compliance Officers will be primarily responsible for overseeing all web-based communications of the Company. In addition, the Compliance Officers will be primarily responsible for updating the investor relations section of the Company's website and for monitoring all Company information placed on the website to ensure that is it accurate, complete and up to date.

5. Procedures for Speeches, Articles, Electronic Communications and Public Appearances. Any speeches made in a public forum, participation on panels (including via webcasts or podcasts), public conferences or other events in which any Enumerated Person might have access must be approved in advance by the Compliance Officers. Any employee making such a public appearance must also provide no less than one week's advance notice of the event to the Compliance Officers. The Compliance Officers will review all such content to ensure compliance with this Policy.

Unless previously authorized by the Compliance Officers, employees, officers and directors of the Company, other than Authorized Spokespersons, are prohibited from participating in Internet or social media forums (including, but not limited to, blogs, chat rooms, Twitter, Facebook, LinkedIn, Snapchat, Instagram and YouTube) when that participation could give the appearance that the employee, officer or director is speaking on behalf of the Company on any matters pertaining to the Company's activities or securities.

6. <u>Financial Guidance, Analyst Reports</u>. Whenever the Company issues or updates financial projections in accordance with this Policy, employees, officers and directors may not subsequently comment on those projections to any Enumerated Person. In response to any question about financial projections, unless otherwise directed by the Compliance Officers, Authorized Spokespersons may say only that it is the Company's policy not to comment on projections during the quarter. The Company also will not comment on its intention to update these materials.

No Authorized Spokesperson may provide updated guidance of any sort with respect to a previous publicly disseminated projection or financial estimate, including but not limited to a reiteration of guidance, except in accordance with the procedures for dissemination of material nonpublic information specified above. If an analyst inquires as to the reliability of a previous publicly disseminated projection or financial estimate, the Authorized Spokesperson should specifically note the date of the last update of such information and should make clear that no update is to be implied in the course of said inquiry (e.g., the Authorized Spokesperson may not state that the Company is "on track" to meet previously issued guidance) absent approval from the Compliance Officers and compliance with the requirements of Regulation FD.

Analyst reports and earnings models may be reviewed only to correct errors that can be corrected by referring to publicly available, historical, factual information or to correct any mathematical errors. No other analyst feedback or guidance on earnings models may be communicated to an analyst.

Furthermore, the Company shall observe a "quiet period" during which the Company shall not comment on financial results. These quiet periods normally begin two weeks prior to the end of each fiscal quarter and end after the next full trading day following the date of the public release of the company's earnings results for that quarter.

- 7. Parties Who May Receive Material Nonpublic Information. There are certain third parties who are required by professional responsibility or by contract to keep the Company's information confidential. These include the Company's attorneys, accountants, investment bankers and other people or entities that are subject to confidentiality or nondisclosure agreements with respect to information about the Company. If you are in doubt about whether someone falls within this category, contact the Compliance Officers for guidance.
- 8. <u>Violations</u>. Violations of Regulation FD are subject to SEC enforcement action, which may include an administrative action seeking a cease-and-desist order or a civil action against the Company or an individual seeking an injunction and/or monetary penalties.

Failure to comply with this Policy may also subject you to Company-imposed sanctions, including dismissal for cause, whether or not your failure to comply with this Policy results in legal action.

Any violation or suspected violation of this Policy must be immediately reported to the Compliance Officers.

## 9. <u>Material Nonpublic Information</u>.

- 9.1. <u>Material information</u>. Information is material if there is a substantial likelihood that a reasonable investor would consider it important in deciding whether to buy, hold or sell a security. Any information that could reasonably be expected to affect the price of the security is material. Some examples of potentially material information are:
  - information regarding the progress or outcomes of the Company's products;
  - significant regulatory developments;
  - timelines for expected launches of new products;
  - projections of future cash expenditures, or other financial guidance;
  - changes to previously announced financial guidance, or the decision to suspend financial guidance;
  - a pending or proposed joint venture or licensing agreement;
  - a pending or proposed merger, acquisition or tender offer;
  - a pending or proposed acquisition or disposition of a significant asset;
  - a Company restructuring;
  - significant related party transactions;

- a change in dividend policy, the declaration of a stock split or an offering of additional securities;
- bank borrowings or other financing transactions out of the ordinary course;
- the establishment of a repurchase program for Company Securities;
- a change in the Company's cost structure;
- a change in management;
- a change in auditors or notification that the auditor's reports may no longer be relied upon;
- pending or threatened significant litigation, or the resolution of such litigation;
- impending bankruptcy or the existence of severe liquidity problems;
- the imposition of a ban on trading in Company Securities or the securities of another company; and
- significant cybersecurity breaches.

Both positive and negative information can be material. Because disclosure that receives scrutiny will be evaluated after the fact with the benefit of hindsight, questions concerning the materiality of particular information should be resolved in favor of materiality and in consultation with the Compliance Officers.

- 9.2. <u>Nonpublic information</u>. Nonpublic information for purposes of this Policy is information that is not generally known or made available to the public through a broad, non-exclusionary means of distribution, such as a Form 8-K.
- 10. <u>Amendments</u>. The Board of Directors of the Company may amend this Policy, or grant waivers in exceptional circumstances, provided that any such modification or waiver may not be a violation of any applicable law, rule or regulation, and, provided further, that any such modification or waiver is appropriately disclosed if required.