



### Code of Business Conduct - Policy

<b>Document Name:</b>	Code of Business Conduct - Policy
<b>Document Owner:</b>	Legal & Compliance People & Culture
<b>Executive Approvers:</b>	Noah Webster, Chief Legal & Compliance Officer Cara Antonacci, Chief People Officer
<b>Classification:</b>	INTERNAL USE ONLY
<b>Audience:</b>	All Everbridge Employees, Temporary Workers and Contractors
<b>Review Frequency:</b>	N/A
<b>Version:</b>	5.0
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<b>Effective as of:</b>	February 1, 2026

## Change/Review History

Version	Author	Date	Description
1.0		March 17, 2022	Published as standalone policy (previously an addendum to Employee Handbook)
1.1	Jennifer Kenyan	March 6, 2023	Updated approvers
1.2	Jennifer Kenyan	February 26, 2024	No changes
1.3	Jennifer Kenyan	January 3, 2025	Added relationship disclosure as a bullet point to conflicts of interest. Added requirement for an initial disclosure in respect of any potential conflicts of interest. Removed wording in respect of 404 Regulation S-K Waivers of this Code – updated wording to reflect Everbridge is no longer publicly listed. For Board Members only – removed this section as no longer relevant. Added a section for conflicts of interest disclosure or confirmation that there is no disclosure required. Updated wording in the receipt and compliance acknowledgement signature requirement.
1.4	Jennifer Kenyan	September 5, 2025	Added clarification on Insider Trading Restrictions.
5.0	Jennifer Kenyan	January 23, 2026	Version number sequence updated Added an embedded Relationship Disclosure form and related wording.

## Review & Approval

This document requires the following management review and approvals. Changes to this document should be recorded in the change/review history.

Name	Title	Signed	Date
Noah Webster	Chief Legal & Compliance Officer		
Cara Antonacci	Chief People Officer	 Cara Antonacci (Jan 23, 2026 09:22:27 EST)	



## Policy Overview

This Code of Business Conduct flows directly from our commitment to our mission and core values. We consistently aim for excellence and to provide value for both our customers and stockholders, and it is critical that we do so with integrity and high ethical standards. It is unacceptable to cut legal or ethical corners for the benefit of Everbridge or for personal benefit.

This code is intended to deter wrongdoing as well as the appearance of wrongdoing. Doing the right thing is more important than winning while risking our reputation or the trust of our customers, partners and stockholders.

This code is designed to ensure:

- Operating our business ethically and with integrity;
- Avoiding actual or apparent conflicts of interest;
- Compliance with the letter and spirit of all laws and Everbridge policies, including full, fair, accurate, timely and understandable disclosure in reports and documents we file with the U.S. Securities and Exchange Commission and in our other public communications; and
- The prompt internal reporting of suspected violations of this code.

To whom does the code apply?

The code applies to all of us, the directors, executives, employees and independent contractors of Everbridge and its subsidiaries. In addition to our own compliance, all of us must ensure that those we manage, and those that we hire to work on our behalf, comply with this policy.

## Honest and Ethical Conduct

Consistent with our core values, Everbridge personnel must act and perform their duties ethically, honestly and with integrity—doing the right thing even when “no one is looking.” We tell customers, partners, publishers, investors and the public the truth about our company. We commit to only what we can do and we deliver on our commitments. No winks. No nods.

## Conflicts of Interest

A conflict of interest may exist where the interests or benefits of one person or entity conflict or appear to conflict with the interests or benefits of Everbridge. Your decisions and actions related to Everbridge should be based on the best interests of Everbridge and not based on personal relationships or benefits, either for yourself or for others. Everbridge personnel must never use or attempt to use their position with Everbridge to obtain improper personal benefits.

A conflict of interest may arise in many situations. We cannot list them all in this policy of course. However, some examples include:

- Serving as a director, employee or contractor for a company that has a business relationship with Everbridge or is a competitor of Everbridge;
- Having a financial interest in a competitor, supplier or customer of Everbridge, other than holding direct interest of less than a 1% in the stock of a publicly traded company;
- Receiving something of material value from a competitor, supplier or customer of Everbridge beyond entertainment or nominal gifts in the ordinary course of business, such as a meal or logo wear;
- Being asked to present at a conference where the conference sponsor has a real or potential business relationship with Everbridge (as a vendor, customer or investor, for example), and the

sponsor offers travel or accommodation arrangements or other benefits materially in excess of our standard benefits; or

- Directly or indirectly using for personal gain, rather than for the benefit of Everbridge, an opportunity that you discovered through your role with Everbridge.
- Being in a relationship with a colleague or working alongside a relative as a colleague. While this typically does not represent practical issues on a daily basis, it is important that the relationship is declared, so that we can ensure measures are put in place to prevent conflicts of interest from happening.

Evaluating whether a conflict of interest exists can be difficult and may involve a number of considerations. We encourage you to seek guidance from your manager and the People Team or the Legal Department when you have any questions or doubts.

To ensure transparency and compliance, all employees, workers and contractors are required to make an initial disclosure regarding conflicts of interest. Employees, workers and contractors must declare either:

- Any actual or potential conflicts of interest they are currently aware of;
- or
- That they do not have any conflicts to disclose at this time.

If anyone declares that they have no conflicts to disclose, they must also agree to promptly notify their manager and the Compliance Committee (General Counsel) should any actual or potential conflicts arise in the future. This proactive approach ensures ongoing compliance and accountability.

If you are aware of an actual or potential conflict of interest, or are concerned that a conflict might develop, please discuss this with your manager and then obtain approval from our Compliance Committee (General Counsel) before engaging in that activity or accepting something of value.

### **Securities Laws – Insider Trading**

It is illegal for you to buy or sell the stock of companies that work with Everbridge on the basis of material, non-public information. It is also illegal for you to pass such information on to others who use it to buy or sell stock. This applies to all directors, officers, employees, consultants and contractors of Everbridge. This restriction also applies to all family members and other household members of those covered by this policy and all companies controlled by those covered by this policy.

### **Compliance**

Everbridge strives to comply with all applicable laws and regulations. It is your personal responsibility to adhere to the standards and restrictions imposed by those laws and regulations, including those relating to financial and accounting matters. The same applies to policies we adopt, such as this one. Even if conduct complies with the letter of the law or our policies, we must avoid conduct that will have an adverse impact on the trust and confidence of our customers, partners or investors. For example, regardless of local practices or actions by competitors, you must never directly or indirectly make a payment (cash or any other items of value) to a foreign official or government employee to obtain or retain business for Everbridge, or to acquire any improper advantage. You must fully comply with all anti-corruption laws of the countries in which we do business, including the U.S. Foreign Corrupt Practices Act, which applies globally. For more information about the rules governing gifts to foreign officials, please reference our [Anti-Corruption Policy](#).



### **Accurate Financial and Accounting Disclosures**

Our principal executive officer, principal financial officer and people who perform similar functions are our “senior financial officers” and are responsible for ensuring that disclosures in our periodic reports and other public communications are full, fair, accurate, timely and understandable.

### **Managing Compliance Accountability**

This code is a statement of certain fundamental principles, policies and procedures that govern Everbridge personnel in the conduct of our business. Reported violations of this code will be investigated and appropriate action taken. Any violation of this code, including fraudulent reports, may result in disciplinary action. That disciplinary action may include termination of employment and legal proceedings if warranted.

### **Reporting**

If you have a concern regarding conduct that you believe to be a violation of a law, regulation or Everbridge policy, or you are aware of questionable legal, financial or accounting matters, or simply are unsure whether a situation violates any applicable law, regulation or Everbridge policy, please:

- Discuss the situation with your manager;
- If your manager is involved in the situation or you are uncomfortable speaking with your manager, contact our Compliance Committee; or
- If you don't believe your concern is being adequately addressed, or you are not comfortable speaking with one of the above-noted contacts, or you believe you are the subject of retaliation for good-faith reporting of a concern, please report your concern via our hotline online at [www.whistleblowerservices.com/EVBG](http://www.whistleblowerservices.com/EVBG) or by phone at 844-401-1749, through which you may choose to identify yourself or remain anonymous. The Compliance Committee, an audit or corporate governance committee member or others, as appropriate, will review concerns submitted through the hotline.

We expect our employees to do their best to comply with this policy. It is important that you stay vigilant to ensure there are no violations of this policy by anyone. Do not stay silent in the face of a potential violation. If you have knowledge of a potential violation and fail to report it via the process set forth above, you too may be subject to disciplinary action under this code.

### **No Retaliation**

Everbridge will not retaliate against any individual for filing a good-faith concern regarding noncompliance with this policy. Everbridge will not retaliate against any individual participating in the investigation of any such complaint either. Finally, Everbridge will not permit any such retaliation by any manager or executive officer or by any company with which we contract.

### **Waivers of this Code**

Any amendment or waiver of any provision of this Code of Business Conduct must be approved in writing by the Board or, if appropriate, its delegate(s) and promptly disclosed pursuant to applicable laws and regulations.

### **Amendments**

We are committed to continuously reviewing and updating our policies. We therefore may amend this code at any time and for any reason. We welcome your comments about this policy as well. Contact your manager or our Compliance Committee with any such comments.

## DECLARATION, RECEIPT AND COMPLIANCE ACKNOWLEDGEMENT

### Disclosure of Conflicts of Interest

In line with this policy, you are asked to disclose any actual or potential conflicts of interest.

### Relationship Disclosure

Where you have a personal relationship with another Everbridge Worker that, under this policy, should be disclosed, please submit the details using the following form: [Relationship Disclosure Form](#). Information will be handled appropriately and shared only with those who need it to access and manage any potential conflict of interest.

All other actual or potential conflicts of interest must be disclosed to your manager and the Compliance Committee in line with this policy.

**I understand it is my responsibility to know and understand the content of this Policy. I have read, understand, and will comply with the Code of Business Conduct including the requirements to:**

- **Disclose any actual or potential conflicts of interest at this point in time (including submitting a Relationship Disclosure via the above form where applicable); and**
- **Promptly notify my manager and the Compliance Committee should any conflicts arise in the future.**