

# EVERCOMMERCE INC.

## CODE OF CONDUCT AND ETHICS

### **Message from the CEO**

Each of you is empowered to make decisions and act in a way that impacts the reputation of EverCommerce and its family of brands. Our Code of Conduct and Ethics serves as the foundation for how we conduct business.

No matter your role or responsibilities within the EverCommerce ecosystem, you are important to ensuring our continued success. We, as an executive team, commit to creating an environment of transparency and accountability, where all of us have the opportunity to grow and encourage one another to be world-class in everything we do. All employees and directors are expected to follow our Code of Conduct and Ethics, to act with integrity, to communicate openly and honestly, and to treat everyone with respect and fairness. We will meet the needs of our customers and our fellow employees by maintaining the highest standards of business conduct and ethics.

The Code of Conduct and Ethics is not a contract, nor does it cover every situation you might encounter in your work. The Code of Conduct and Ethics cannot replace simple good sense or individual conscience and honesty. Doing the right thing is part of our culture and is expected of each of you. No document can guarantee ethical behavior—only each of us individually can do that.

I expect everyone to accept personal responsibility for observing the letter and spirit of this Code. If you see something that doesn't seem right, speak up! We want to hear from you.

Thank you for your continued dedication to EverCommerce.



Eric Remer  
Chief Executive Officer  
EverCommerce

## **1. INTRODUCTION**

### **1.1 GENERAL**

The Code of Conduct and Ethics (the “Code”) is the essence of EverCommerce Inc. (“EverCommerce”) management philosophy and provides an overview of standards of behaviors applicable to all EverCommerce officers, employees and members of the EverCommerce Board of Directors (the “Board”). It is not, however, an exhaustive statement of EverCommerce’s policies and procedures, nor does it address every potential scenario. When faced with questions beyond those addressed in the Code, we are expected to follow both the spirit and letter of the Code and the other EverCommerce policies and procedures that govern the issue. We are expected to observe these high standards and use good judgment in situations where rules may not clearly define the appropriate course of action. If you need help, you should reach out to your manager, the People Experience team, the Legal Department or the anonymous EverCommerce Hotline ([www.speakupevercommerce.com](http://www.speakupevercommerce.com)).

This Code is not a contract of employment, and it does not create any contractual rights between you and EverCommerce or any of its subsidiaries or affiliates. Unless otherwise set forth in writing and signed by an EverCommerce executive, employment at EverCommerce or its subsidiaries or affiliates is on an “at-will” basis. This means that you can end your employment whenever you wish, for any reason, just as EverCommerce may end your employment at any time, with or without notice and with or without cause. It is EverCommerce policy that any employee or director who violates this Code will be subject to appropriate discipline, which may include, for an employee, termination of employment or, for a director, a request that such director resign from the Board.

In this Code, we refer to our principal executive officer, principal financial officer, principal accounting officer and controller, or persons performing similar functions, as our “principal financial officers.”

### **1.2 ADDITIONAL RESPONSIBILITY**

Managers are expected to exemplify the highest standards of ethical business conduct. We maintain an open-door policy, promoting open discussion of ethical and legal implications of business decisions amongst all EverCommerce employees at all times. Managers have a responsibility to create and sustain a work environment in which we know that ethical, legal behavior is expected.

This responsibility includes ensuring the Code is communicated to those employees working for or with the manager. It also means managers are responsible for ensuring subordinates are properly trained and familiar with policies required to perform their jobs and where to go if they have questions or concerns.

### **1.3 ACKNOWLEDGMENT**

Employees acknowledge their understanding and agreement to comply with the Code upon commencement of employment. After reading this Code and on an annual basis, all officers, directors and employees should execute and return to the Company’s General Counsel the Certification of Compliance form attached hereto as “Attachment A.”

### **1.4 WAIVERS**

Any waiver of this Code for our directors, executive officers or other principal financial officers may be made only by the Audit Committee of our Board of Directors and will be disclosed to the public as required by law or the rules of The Nasdaq Stock Market LLC, when applicable. Waivers of this Code for other employees may be made only by our Chief Executive Officer or General Counsel and will be reported to our Audit Committee.

## **2. EVERCOMMERCE CORPORATE VALUES – I-GROW**

Our values are a core element of our culture at EverCommerce. As employees, managers, directors and principal officers, it is crucial we not only understand our values but that our actions and behaviors reflect them every day.

### **Inclusive:**

We embrace differences and respect all people, allowing individuals to bring their full authentic selves into our organization.

### **Growth:**

We thrive on growing both personally and professionally.

### **Reflection:**

We constantly focus internally to improve how we connect externally with the world.

### **Opportunity:**

We provide opportunities so individuals can reach the next level of their journey.

### **World-Class:**

We aspire to be world-class in everything we do – Talent, Technology, Operations, and Service.

## **3. ASKING FOR GUIDANCE AND VOICING CONCERNS**

We encourage you to raise any questions or concerns about this Code or any other EverCommerce policies or procedures. You should be alert to any violations and should immediately report them to your manager, the People Experience team, the Legal Department or the anonymous EverCommerce Hotline ([www.speakupevercommerce.com](http://www.speakupevercommerce.com))

Your concerns will be taken seriously, and all information provided in this process will be treated in a confidential manner to the extent possible. You may also choose to submit your questions or concerns to the EverCommerce Hotline anonymously.

Anyone who knowingly and willfully reports false information will be subject to disciplinary action.

### **3.1 ANTI-RETALIATION**

EverCommerce does not tolerate retaliation against any employee who raises concerns or questions regarding a potential violation of the law, this Code or any company policy. If you believe you are being retaliated against in this manner, contact your manager, the People Experience team, the Legal Department or the anonymous EverCommerce Hotline ([www.speakupevercommerce.com](http://www.speakupevercommerce.com)).

## **4. FOSTER DIVERSITY AND INCLUSION**

At EverCommerce we treat one another with respect and fairness at all times, just as we wish to be treated ourselves. We value diversity and inclusion, and respect the culture and customs of our employees, business partners, and customers. We strive to establish an environment where everyone is welcome and has the equal opportunity to grow within the organization.

#### **4.1 EQUAL OPPORTUNITY EMPLOYMENT**

Consistent with applicable federal, state, and local laws, EverCommerce expressly prohibits all forms of employment discrimination based on race, creed, color, religion, sex, gender (including pregnancy), sexual orientation, national origin, ancestry, age, veteran status, genetic information, any physical or mental disability, or any other legally protected status.

#### **4.2 ANTI-HARASSMENT**

EverCommerce prohibits discrimination, harassment and bullying in any form. Everyone is encouraged to speak out when another employee's conduct makes you or others uncomfortable, and to report harassment when it occurs. Reach out to your manager, the People Experience team, the Legal Department or the anonymous EverCommerce Hotline ([www.speakupearcommerce.com](http://www.speakupearcommerce.com)) if you believe you have been harassed, discriminated against or bullied.

#### **4.3 INTEGRITY**

EverCommerce holds itself to the highest ethical standards as a company, and we expect all of our employees, managers, directors and principal officers to do the same. We are committed to interacting in an open, honest, positive manner and to maintain an environment built on trusting one another.

### **5 COMPLY WITH LAWS AND REGULATIONS**

EverCommerce complies with the laws, rules, and regulations applicable where it conducts business. Each of us must respect and comply with all applicable laws, rules, and regulations of the United States, Canada, the United Kingdom, Australia, New Zealand, and Jordan and other countries, states, provinces, and jurisdictions in which EverCommerce companies conduct business. If you aren't sure about the laws that might apply in any given situation, reach out to the Legal Department for advice at [legal@evercommerce.com](mailto:legal@evercommerce.com) or anonymously through the EverCommerce Hotline ([www.speakupearcommerce.com](http://www.speakupearcommerce.com)). A few specific laws are easy to violate unintentionally and are worth pointing out below.

#### **5.1 INTERACTIONS WITH THE GOVERNMENT**

We must take special care to comply with all legal and contractual obligations when dealing with governments and government officials. National and local governments around the world have specific and varied procurement laws and regulations. Such laws generally prohibit or put strict limits on gifts, entertainment, and travel offered to government officials. Each of you who deals with government officials and contracts is responsible for knowing and complying with applicable laws and regulations.

EverCommerce deals honestly and fairly with government authorities and complies with valid government requests and processes. You must be truthful and straightforward in any dealings with the government and may not direct or encourage others to provide false or misleading information to any government official or representative.

In addition to the above, you must obtain approval from the Legal Department for any work activity that requires communication with any member or employee of a legislative body or with any government official or employee. Work activities covered by this policy include meetings with legislators or members of their staffs or with senior executive branch officials on behalf of the Company. Preparation, research and other background activities that are done in support of lobbying communication are also covered by this policy even if the communication ultimately is not made.

Please see additional information regarding EverCommerce policy on government interactions in the Employee Compliance Policy Handbook, available on the EverHub intranet site. If any doubt exists about whether a given work activity would be considered covered by this provision or any other EverCommerce policy, you should seek advice immediately from your supervisor or the Legal Department.

## **5.2 TRADE CONTROLS**

Many countries regulate international trade transactions, such as imports, exports and international financial transactions. In addition, the United States prohibits any cooperation with boycotts against countries friendly to the United States or against firms that may be “blacklisted” by certain groups or countries. It is EverCommerce’s policy to comply with these laws and regulations even if it may result in the loss of business opportunities.

Please see additional information regarding EverCommerce policy on trade controls in the Employee Compliance Policy Handbook, available on the EverHub intranet site. These laws are complex, but if you are in any way involved in sending or making available EverCommerce companies’ products, services, software, equipment, or any form of technical data from one country to another, work with your manager and the Legal Department to ensure that the transaction stays within the bounds of the law.

## **5.3 COMPETITION LAWS**

Antitrust laws of the United States and other countries are designed to protect consumers and competitors against unfair business practices and to promote and preserve competition. Our policy is to compete vigorously and ethically while complying with all antitrust, monopoly, competition or cartel laws in all countries, states or localities in which the Company conducts business. Violations of antitrust laws may result in severe penalties against the Company and its employees, including potentially substantial fines and criminal sanctions. You are expected to maintain basic familiarity with the antitrust principles applicable to your activities, and you should consult the Company’s Legal Department with any questions you may have concerning compliance with these laws.

Employees should exercise caution in meetings with competitors. Any meeting with a competitor may give rise to the appearance of impropriety. As a result, if you are required to meet with a competitor for any reason, you should obtain the prior approval of an executive officer of the Company. You should try to meet with competitors in a closely monitored, controlled environment for a limited period of time. You should create and circulate agendas in advance of any such meetings, and the contents of your meeting should be fully documented.

Employees should be cautious when attending meetings of professional organizations and trade associations at which competitors are present. Attending meetings of professional organizations and trade associations is both legal and proper, if such meetings have a legitimate business purpose and are conducted in an open fashion, adhering to a proper agenda. At such meetings, you should not discuss the

Company's pricing policies or other competitive terms or any other proprietary, competitively sensitive information. You are required to notify your supervisor or the Legal Department prior to attending any meeting of a professional organization or trade association.

#### **5.4 ANTI-BRIBERY LAWS**

The Company is committed to complying with the U.S. Foreign Corrupt Practices Act (the "FCPA") and other applicable anti-corruption laws. The FCPA prohibits the Company and its employees, directors, officers, and agents from offering, giving, or promising money or any other item of value, directly or indirectly, to win or retain business or to influence any act or decision of any government official, political party, candidate for political office, official of a public international organization, or any individuals in a position to influence them. The Company prohibits employees, directors, and officers from giving or receiving bribes, kickbacks, or other inducements to foreign officials. This prohibition also extends to payments to agents acting on the Company's behalf if there is reason to believe that the payment will be used indirectly for a prohibited payment to foreign officials. Indirect payments include any transfer of money or other item of value to another individual or organization where the person making the transfer knows or has reason to know that some or all of that transfer is for the benefit of an individual to whom direct payments are prohibited. The use of agents for the payment of bribes, kickbacks or other inducements is expressly prohibited.

Violation of the FCPA and other applicable anti-corruption laws is a crime that can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including, for an employee, termination of employment or, for a director, a request that such director resign from the Board of Directors. For further guidance, please contact the Legal Department or reference additional information regarding EverCommerce policy for doing business with foreign officials in the Employee Compliance Policy Handbook available on the EverHub intranet site.

#### **5.5 INSIDER TRADING LAWS**

Consistent with the Company's Insider Trading Compliance Policy, the Company's employees and directors are prohibited from trading in the stock or other securities of the Company while in possession of material nonpublic information about the Company. In addition, Company employees and directors are prohibited from recommending, "tipping" or suggesting that anyone else buy or sell the Company's stock or other securities based on material non-public information. Employees and directors who obtain material non-public information about another company in the course of their duties are prohibited from trading in the stock or securities of the other company while in possession of such information or "tipping" others to trade on the basis of such information. Violation of insider trading laws can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including, for an employee, termination of employment or, for a director, a request that such director resign from the Board of Directors. You are required to read carefully and observe our Insider Trading Compliance Policy, as amended from time to time. Please go to EverHub, the Company's intranet site, to find a copy of the Insider Trading Compliance Policy or reach out to the Legal Department with any questions you may have about insider trading laws.

#### **5.6 REGULATION FD AND PUBLIC COMMUNICATIONS**

The Company places a high value on its credibility and reputation in the community. What is written or said about the Company in the news media and investment community directly impacts our reputation, positively or negatively. Our policy is to provide timely, accurate and complete information in response to public requests (from media, analysts, etc.), consistent with our obligations to maintain the confidentiality of competitive and proprietary information and to prevent selective disclosure of market-sensitive financial data. The Company has adopted a separate Guidelines for Corporate Disclosure to maintain the Company's credibility and reputation in the community, to maintain the confidentiality of competitive and proprietary information and to prevent selective disclosure.

In connection with its public communications, the Company is required to comply with a rule under the federal securities laws referred to as Regulation FD (which stands for "fair disclosure"). Regulation FD provides that, when we disclose material non-public information about the Company to securities market professionals or stockholders (where it is reasonably foreseeable that the stockholders will trade on the information), we must also disclose the information to the public. "Securities market professionals" generally include analysts, institutional investors and other investment advisors.

The Company has designated certain individuals as "spokespersons" who are responsible for communicating with analysts, institutional investors and representatives of the media. Any employee or director who is not a designated spokesperson of the Company should not communicate any information about the Company to analysts, institutional investors or representatives of the media, except at the request of the Company's designated spokespersons or as specifically provided in the Company's Guidelines for Corporate Disclosure.

For more information on the Company's policies and procedures regarding public communications and Regulation FD, please contact the Legal Department for a copy of the Company's Guidelines for Corporate Disclosure or with any questions you may have about disclosure matters.

## **6. BUSINESS PRACTICES AND BUSINESS PARTNERS**

### **6.1 AVOID CONFLICTS OF INTEREST**

Each of us must act with honesty and ethical behavior, avoid actual or apparent conflicts of interest between personal and professional relationships whenever possible, and handle such conflicts openly and fairly on behalf of EverCommerce. A conflict of interest exists when a personal interest or activity interferes or appears to interfere with the duties you perform at, or owe to, EverCommerce. A conflict of interest may unconsciously influence even the most ethical person, and even the appearance of a conflict may cause your actions or integrity to be questioned.

Potential conflicts of interest must be disclosed to your manager, the People Experience team, the Legal Department or the anonymous EverCommerce Hotline ([www.speakupevercommerce.com](http://www.speakupevercommerce.com)). The Legal Department will work with you to determine whether you have a conflict of interest and, if so, how best to address it. All transactions that could give rise to a conflict of interest involving a director, executive officer or principal financial officer must be approved by the Audit Committee of the Board of Directors, and any such approval will not be considered a waiver of this Code.

It is not possible to define all the situations that can involve a conflict of interest. In most cases, however, good judgment should be sufficient to evaluate a situation.

The following situations might reasonably be expected to give rise to a conflict of interest:

- Outside Employment. An employee being employed by, serving as a director of, or providing any services to a company that the individual knows, or suspects is a material customer, supplier or competitor of the Company (other than services to be provided as part of an employee's job responsibilities for the Company).
- Improper Personal Benefits. An employee or director obtaining any material (as to him or her) personal benefits or favors because of his or her position with the Company. Please see Section 6.2 below for additional guidelines in this area.
- Financial Interests. An employee having a "material interest" (ownership or otherwise) in any company the individual knows or suspects is a material customer, supplier or competitor of the Company and using his or her position to influence a transaction with such company. Whether an employee has a "material interest" will be determined by the General Counsel or the Board of Directors, as applicable, in light of all of the circumstances, including consideration of the relationship of the employee to the customer, supplier or competitor, the relationship of the employee to the specific transaction and the importance of the interest to the employee having the interest.
- Loans or Other Financial Transactions. An employee or director obtaining loans or guarantees of personal obligations from, or entering into any other personal financial transaction with, any company that the individual knows or suspects is a material customer, supplier or competitor of the Company. This guideline does not prohibit arms-length transactions with banks, brokerage firms or other financial institutions.
- Service on Boards and Committees. An employee or director serving on a board of directors or trustees or on a committee of any entity (whether profit or not-for-profit) whose interests reasonably would be expected to conflict with those of the Company.
- Actions of Family Members. The actions of family members outside the workplace may also give rise to the conflicts of interest described above because they may influence an employee's or director's objectivity in making decisions on behalf of the Company. For purposes of this Code, "family members" include your spouse or life-partner, brothers, sisters, parents, in-laws and children whether such relationships are by blood or adoption.

For purposes of this Code, a company is a "material" customer or partner if the customer or partner has made payments to the Company in the past year in excess of \$120,000. A company is a "material" supplier if the supplier has received payments from the Company in the past year in excess of \$120,000. If you are uncertain whether a particular company is a material customer or supplier, please contact the General Counsel for assistance.

In each of these situations, the rule is the same – if you are considering entering into a business situation that creates a conflict of interest, don't do it. If you are in a business situation that may create a conflict of interest, or the appearance of a conflict of interest, review the situation with your manager and the Legal Department.

If you have any doubt about whether a conflict exists, contact the Legal Department for guidance.

## **6.2 GIFTS AND ENTERTAINMENT**

Under no circumstance should you offer or accept money, gifts, entertainment or any other individual gratuity to/from a customer, vendor or competitor, other than customary token giveaways, meals, events



with a specific business purpose, and event tickets. Acceptance or provision of these inexpensive non-cash gifts is generally permissible, but they should never be excessive or give the appearance of impropriety.

Gifts or courtesies offered—even if just of token value—must never be in return for a specific decision or outcome or made with the expectation that it will influence a decision. Permitted gifts, hospitality, and reimbursement of expenses must be:

- Made without creating obligation or expectations—the gift or hospitality should not place the recipient under any obligation and should not create any expectations in the giver.
- Made openly—if made secretly, then the purpose will be suspect.
- In accord with stakeholder perception—or otherwise may be viewed unfavorably by stakeholders if made known to them.
- Of reasonable value—the gift should be small, and the value of hospitality should be in accord with general business practice.
- Appropriate—the nature of the gift or hospitality should be appropriate to the relationship and should accord with general business practice.
- Legal—conforming to the laws of the country in which it is made and complying with laws as required by EverCommerce.
- In conformity with the recipients’ rules—the gift or hospitality should meet the rules or code of conduct of the receiving organization.
- Infrequent—such that giving and receiving between the giver and receiver should not occur regularly.

### **6.3 BUSINESS OPPORTUNITIES**

As an employee or director of the Company, you have an obligation to advance the Company’s interests when the opportunity to do so arises. Subject to Article XI of the Company’s Amended and Restated Certificate of Incorporation (the “Certificate”), if you discover or are presented with a business opportunity through the use of corporate property or information or because of your position with the Company, you should first present the business opportunity to the Company before pursuing the opportunity in your individual capacity. Subject to Article XI of the Certificate, no employee or director may use corporate property, information or his or her position with the Company for personal gain while employed by us or, for a director, while serving on our Board of Directors.

You should disclose to your supervisor the terms and conditions of each business opportunity covered by this Code you wish to pursue. Your supervisor will contact the Legal Department and the appropriate management personnel to determine whether the Company wishes to pursue the business opportunity. If the Company waives its right to pursue the business opportunity, you may pursue the business opportunity on the same terms and conditions as originally proposed and consistent with the other ethical guidelines set forth in this Code.

### **6.4 FAIR DEALING**

All employees should endeavor to deal fairly with fellow employees and with the Company’s collaborators, licensors, customers, suppliers and competitors. Employees should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information,

misrepresentation of material facts or any other unfair-dealing practice. Employees should maintain and protect any intellectual property licensed from licensors with the same care as they employ with regard to Company-developed intellectual property. Employees should also handle the nonpublic information of our collaborators, licensors, suppliers and customers responsibly and in accordance with our agreements with them, including information regarding their technology and product pipelines.

## **7. SAFEGUARDING COMPANY RESOURCES**

### **7.1 CONFIDENTIALITY**

Confidential information includes, without limitation, all non-public information of EverCommerce and each of its companies, such as:

- Business and marketing plans
- Product and service information
- Internal company communications

If the disclosure of confidential information is required, or even likely to be required, to conduct business with a third party, an EverCommerce non-disclosure agreement (NDA) must be signed by the third party before disclosure is made. Unauthorized disclosure of any confidential information is prohibited. For the avoidance of doubt, directors that have been designated to the Board pursuant to the Stockholders' Agreement entered into by and among the Company and stockholders affiliated with Providence Strategic Growth and Silver Lake may share confidential information with Providence Strategic Growth and Silver Lake.

### **7.2 PROTECTION AND USE OF COMPANY ASSETS**

All EverCommerce property must be maintained according to company standards. EverCommerce property is to be kept in good condition and used primarily for work-related purposes.

To maintain a safe, healthy, and efficient working environment—and to protect EverCommerce property, equipment, operations, and customers—EverCommerce reserves the right to inspect all EverCommerce property at any time.

All company-issued computers and other equipment are the property of EverCommerce. EverCommerce voicemail and/or e-mail should primarily be used for business purposes. EverCommerce reserves the right to monitor voicemail and e-mail messages without notice to the employee, at any time, and not necessarily in the employee's presence.

Cooperation in the conduct of inspections or searches is required as a condition of employment. An EverCommerce-initiated search does not necessarily imply an accusation of theft. You must protect EverCommerce assets and ensure their efficient use. EverCommerce assets shall not be sold, loaned, or given away, regardless of condition or value, without proper authorization. EverCommerce assets include, without limitation, equipment, buildings, tools, funds, accounts, supplies, computer programs, information technology, documents, know-how, data, patents, trademarks, copyrights, cellular telephones, and any other resources or property of EverCommerce.

We must protect against waste, loss, damage, misuse, theft, misappropriation, or infringement of EverCommerce assets, and we must use these assets in responsible ways. In addition, we must be vigilant

regarding access to our assets by others. Any such access to EverCommerce intellectual or physical assets must be limited to authorized persons for an authorized business purpose.

Additional information regarding the protection and use of EverCommerce property can be found in the EverCommerce Acceptable Use Policy and the Personnel Security Policy, both of which are included in the Employee Compliance Policy Handbook, available on the EverHub intranet site.

### **7.3 ACCURACY OF COMPANY RECORDS**

All EverCommerce data, records, and reports must be complete, accurate, truthful, verifiable, and fairly presented. Such documents include, but are not limited to, expense reports, accounting entries, cost estimates, patient records, patient billing statements, contract proposals, and other presentations to management, customers, and the public. It is essential that those who rely on these documents—managers, creditors, customers, auditors, and other decision makers—have truthful and accurate information. The integrity of the EverCommerce accounting, technical, personnel, financial, patient, and other records is based on their validity, accuracy, and completeness.

Anyone preparing the type of documents described above must be diligent in ensuring the document's accuracy and completeness. Anyone representing or certifying the accuracy of such information should make inquiries and/or perform adequate reviews to establish a good faith belief in the accuracy of the information. Custodians of EverCommerce data, records, and reports must be sure that such information is released, whether internally or externally, only if adequately protected and then only for authorized purposes. Both federal law and our policies require the disclosure of accurate and complete information regarding the Company's business, financial condition and results of operations. Inaccurate, incomplete or untimely reporting will not be tolerated and can severely damage the Company and result in legal liability.

The Company's principal financial officers and other employees working in the finance department have a special responsibility to ensure that all our financial disclosures are full, fair, accurate, timely and understandable. These employees must understand and strictly comply with generally accepted accounting principles and all standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts.

Any questionable accounting practices must be immediately reported through the EverCommerce Hotline ([www.speakupevercommerce.com](http://www.speakupevercommerce.com)) or to the General Counsel and/or the Audit Committee of the Board of Directors, including, without limitation to, the following:

- Fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement, or the recording and maintaining of financial records
- Deficiencies in, or failure to comply with, internal accounting controls
- Misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports, or audit reports or deviation from full and fair reporting of EverCommerce' financial condition

### **7.4 RECORDKEEPING**

EverCommerce sustains a system of internal accounting controls sufficient to provide reasonable assurances that:

- All transactions are performed in accordance with management's general or specific authorization.
- All transactions are properly recorded to maintain accountability for EverCommerce assets and liabilities.
- Access to EverCommerce assets is allowed only in accordance with management's general or specific authorization.
- The recorded accountability for assets is physically compared with the existing assets at reasonable periods and appropriate action is taken with respect to any variances.
- Undisclosed or unrecorded funds or assets are not allowed to be created for any purpose.

## **7.5 RECORD RETENTION**

All employees must make themselves aware of retention guidelines prior to the disposal or destruction of any EverCommerce records or files. These guidelines are documented in the EverCommerce Information Classification, Handling, Data Retention and Disposal Policies and Procedures which are included in the Employee Compliance Policy Handbook, available on the EverHub intranet site.

Retention guidelines are necessary because of laws and regulations that require retention of certain records for various time periods, particularly in the areas of billing, taxes, contracts, personnel, health and safety, and corporate structure.

When litigation or an investigation is pending, relevant records (including records in electronic format) are not allowed to be destroyed. Destruction or falsification of any potentially relevant documents may lead to criminal prosecution for obstruction of justice or making false statements. Therefore, if you have any doubt about the legality of destroying any document, consult with your immediate supervisor or the Legal Department prior to doing so.

## **8. COMMUNITY INVOLVEMENT**

### **8.1 PERSONAL ACTIVITIES**

EverCommerce understands the need for balance between work and personal life. We encourage you to be involved in your community. However, out of respect for one another and in order to create a hospitable work environment, you should refrain from imposing your personal beliefs or opinions on others in the workplace. Additionally, you should not represent personal opinions as if they are opinions or positions of EverCommerce.

### **8.2 POLITICAL ACTIVITIES AND CONTRIBUTIONS**

Political activities should be conducted on your own time and using your own resources. You should not promote any political or personal views or beliefs (including by posting or distributing notices or other materials) on or around EverCommerce premises, and you should not indicate or suggest that you speak for EverCommerce or that EverCommerce supports your views. However, as an individual with your own beliefs and pursuits you certainly may speak or post on social media or any other forum on your own behalf as long as it is not on behalf of the company. When you participate in non-Company political affairs, you should be careful to make it clear that your views and actions are your own, and not made on behalf of the Company.

### **8.3 CHARITABLE CAUSES**

EverCommerce believes in giving back to our communities where we live, work and service our customers. We continue to find ways to support and champion our employees in their volunteer efforts for charities important to them.

## **9. QUESTIONS**

Should you have any questions regarding the Code or need additional guidance, please contact:

People Experience – [peopleops@evercommerce.com](mailto:peopleops@evercommerce.com)

Legal Department – [legal@evercommerce.com](mailto:legal@evercommerce.com); General Counsel – [lstorey@evercommerce.com](mailto:lstorey@evercommerce.com)

To anonymously contact these departments or report a violation anonymously, please use the EverCommerce Hotline below. You may also choose to identify yourself when making a report via the Hotline, though it is not required.

Call (800) 461-9330 (or go to the below website for local numbers if you are not in the US)

Text to (720) 770-8210

[www.speakupevercommerce.com](http://www.speakupevercommerce.com)