



Regulation FD Disclosure Policy Statement

I. Introduction

Compass Diversified Holdings, Compass Group Diversified Holdings LLC (collectively, the “**Company**”) and Compass Group Management LLC (the “**Manager**”) are committed, consistent with legal and regulatory requirements, to maintaining an active and open dialogue with the Company’s securityholders and potential investors.

The Securities and Exchange Commission’s (“**SEC**”) Regulation Fair Disclosure (“**Regulation FD**”) prohibits the selective disclosure of material nonpublic information to certain Enumerated Persons (as described below, including broker-dealers, analysts and securityholders). The regulation is intended to eliminate situations where a company may disclose material nonpublic information, such as earnings information, to Enumerated Persons before disclosing the information to the general public.

Regulation FD requires that, whenever the Company (or a person acting on its behalf) intentionally discloses material nonpublic information to an Enumerated Person, the Company must simultaneously disseminate the information to the public. If the Company learns that it has unintentionally disclosed material nonpublic information, such information must be promptly disclosed.¹

The guidelines and procedures set forth in this Regulation FD Policy Statement (this “**Policy**”) apply to all directors, employees and independent contractors of the Manager and the Company and its subsidiaries. The Company’s General Counsel may pre-approve any deviation from the guidelines and procedures outlined in this Policy.

II. Authorized Representatives

The only persons authorized to speak on behalf of the Company to Enumerated Persons are the Company’s Board Chair; Chief Executive Officer; Chief Financial Officer; General Counsel; the Chief Operating Officer of the Manager; the Company’s investor relations contacts (including the investor relations service provider listed on the Company’s website) (“**Investor Relations**”); or other persons specifically designated by them to speak with respect to a particular topic or purpose (each an “**Authorized Representative**”).

Certain members of the Chief Financial Officer’s staff, as designated by the Chief Financial Officer, are authorized to communicate with securityholders and beneficial owners in response to inquiries regarding shareholder accounts and other administrative matters.

¹ In the case of an unintentional disclosure, the disclosure must be made “promptly,” which means as soon as reasonably practicable, but no later than either 24 hours after discovery of the unintentional disclosure or prior to the commencement of the next day’s trading on the New York Stock Exchange, if later.



Other officers of the Company and/or the Manager may communicate, from time to time, with Enumerated Persons, subject to the prior approval of an Authorized Representative. Such persons are not authorized to communicate business or financial information about the Company that is material non-public information, except through Company-approved public disclosure. For purposes of this Policy, “public disclosure” means filing or furnishing a Form 8-K with the SEC, and/or by disseminating information through other recognized channels of distribution that are reasonably designed to provide broad, non-exclusionary distribution of the information to the public (such as a press release distributed through a national news wire service). It is essential that the Company’s legal department and Investor Relations representatives have knowledge of the information being disseminated by those individuals to facilitate the Company’s compliance with other applicable legal and regulatory requirements in its external communications.

To the extent practicable, Authorized Representatives should contact an appropriate person in the Investor Relations and legal departments before having conversations with any Enumerated Person in order to review the substance of the intended communication, including slides and other prepared materials, and to consider potential inquiries that may be raised an Enumerated Person in connection with such communication and prepare Regulation FD-appropriate responses. In addition, to the extent practicable, all Authorized Representatives (other than Authorized Representatives who are representatives of Investor Relations) should be accompanied by a representative of Investor Relations at such conversations.

III. “Enumerated Persons” Subject to Regulation FD Disclosure Requirements

Regulation FD prohibits selective disclosure to certain specified persons, including (a) broker-dealers and persons associated with them, including investment analysts; (b) investment advisers, certain institutional investment managers and their associated persons; and (c) investment companies, hedge funds, and affiliated persons. Selective disclosure is also prohibited if made to any securityholder under circumstances in which it is reasonably foreseeable that the securityholder would purchase or sell securities on the basis of disclosed information. (All such persons referenced in this paragraph, the “**Enumerated Persons**”).

Communications in the ordinary course within the Company (including its subsidiaries and the Manager) to or among employees or directors on matters that are related to the participants’ duties with the Company are not subject to Regulation FD. Communications in the ordinary course of business with customers, suppliers or strategic partners, as well as communications with the press or news organizations, rating agencies, the government or persons who owe a duty of confidence to the Company, are not subject Regulation FD. Communications made in connection with certain offerings of registered securities are not subject to Regulation FD.

IV. Day-to-Day Communications

Inquiries from analysts, securityholders and other Enumerated Persons received by any



director or employee other than an Authorized Representative regarding the Company's financial condition, results of operations, strategies and other similar matters, should be forwarded promptly to the Company's Chief Financial Officer or another Authorized Representative. Under no circumstances should any attempt be made to handle these inquiries without prior authorization and input from an Authorized Representative.

The Company believes that one-on-one communications with securities analysts, broker-dealers, securityholders and other Enumerated Persons can be a valuable component of its investor relations program. During such conversations, Authorized Representatives may discuss information the Company has previously publicly disclosed, non-material information and generally known Company or industry- related information.

If practicable, planned conversations should include a designated Investor Relations representative. It should be determined in advance whether any material nonpublic information is intended to be disclosed. If so, the material nonpublic information should be disclosed prior to, or simultaneously with, the planned conversation by the issuance of a press release, the filing or "furnishing" of a report on a Form 8-K, and/or other means reasonably designed to provide broad, non-exclusionary distribution of the information to the public.

The Company's Director of Communications will periodically update the key public statements and messages and circulate to the Authorized Representatives to ensure awareness of information in the public domain.

V. Public Disclosure of Significant Company Information

Any time an Authorized Representative determines to disclose or discuss nonpublic Company information with anyone who is or might be an Enumerated Person, the Authorized Representative may review this Policy or consult with the Company's legal department or other departments, as appropriate, to determine whether the information is material. Information is material if there is a substantial likelihood that a reasonable investor would consider it important in making a decision to buy, sell, or hold a security or where the fact is likely to have a significant effect on the market price of the security. Both positive and negative information may be material.

Possible material information or events include, but are not limited to:

- earnings information and quarterly results;
- guidance/statements on earnings estimates;
- certain mergers, acquisitions, tender offers, joint ventures, or changes in assets;
- new investments or financings or developments regarding investments or financings;
- changes in control of the Company or changes in senior management;
- changes in auditors or auditor notification that the issuer may no longer rely on an audit report;
- significant events concerning the Company's physical assets;



- events regarding the Company's securities (e.g., repurchase plans, stock splits or changes in dividends, changes to the rights of securityholders, public or private sales of additional securities or information related to any additional funding);
- bankruptcies or receiverships;
- regulatory investigations or litigation-related developments involving the Company;
- regulatory approvals or changes in regulations and any analysis of how they affect the Company; and
- cybersecurity risks and incidents, including vulnerabilities and breaches.

If the determination is made that the information to be disclosed is material, the information must be disclosed in a Regulation FD-compliant manner (e.g., a press release and accompanying Form 8-K) before or at the same time that the information is disclosed to the Enumerated Person. The public disclosure may either disclose the material information or, if it is issued prior to disclosure to the Enumerated Person, may disclose that a conference call and/or webcast will be held to disclose the information. The public must be given adequate advance notice of any conference call and/or webcast and the means of accessing it.

VI. Earnings Calls/Updates

Adequate advance public notice shall be given of earnings conference calls and/or webcasts, which shall be held quarterly. Notice shall include a press release issued to major news wires and a posting on the Company's website with information including the date, time, telephone number and webcast URL for the earnings call. Quarterly earnings conference calls and/or webcasts will be open to analysts, media representatives and the general public and shall be recorded and available for playback via the Company's website after the conference call. The Company will make certain that the oral forward-looking statement safe harbor is recited at the beginning of the call or webcast and included on any playback mechanism so that the date of the information discussed in the call or webcast is unmistakable to listeners of archived material.

As needed, from time to time, the Company may hold topical investor conferences open to the public and media and provide public notice of the conference through a media release, by electronic distribution, posting on at least one well known public financial information website, and the Company website.

VII. Guidance, Quiet Period and Analyst Reports

All guidance provided by the Company relative to Company financial goals, and changes to or affirmation of guidance, will be provided through public disclosure. Whenever the Company has issued any estimate or projections regarding earnings or other financial measures, no employee will elaborate or provide new material information related to those projections other than through publicly disseminated statements. The Company will not comment on its intention to update these materials other than through publicly disseminated statements.



No Authorized Representative shall provide “comfort” with respect to an earnings estimate or otherwise “walk the Street” up or down (i.e., suggest adjustments to an analyst’s estimates). If an analyst inquires as to the reliability of a previously, publicly disseminated projection, the spokesperson should follow the “no comment” policy.

Other than publicly disseminated statements, as such term is interpreted in accordance with Regulation FD, the Company will observe a “quiet period,” during which the Company shall not comment on its earnings estimates or other prospective financial results for the period for the Company. The quiet period will begin fourteen days prior to release of the Company’s earnings for the quarter and continue until the Company’s earnings information for the applicable period is made public.

Analyst reports and earnings models may only be reviewed to correct errors that can be corrected by referring to publicly available, historical, factual information or to correct any mathematical errors. The Company and its employees cannot give earnings guidance in any form (including “soft” or indirect guidance) other than through public disclosure.

VIII. Analyst Meetings/Investment Banker Conferences/Roadshows

This Policy will apply to communications between Authorized Representatives and Enumerated Persons at analyst meetings, investment banker conferences and roadshows (other than roadshows undertaken in connection with a public offering of the Company’s securities which are not subject to Regulation FD).

The Company will participate in securities firm-sponsored and other investor conferences only to the extent that adequate prior public notice is given. The Company’s practice is to issue media releases in conjunction with the Company’s major presentations scheduled during the year, and to post those presentations on its website.

The Company will participate in other forums at which Enumerated Persons could be present, including industry seminars, trade shows, employee, retiree, annual shareholder meetings, and meetings with commercial partners that are shareholders. The Company does not intend to disclose any material nonpublic information during these meetings.

Safe harbor guidelines for forward-looking information will be utilized as part of individual, group, and investor conference communications formats. Prior to the meeting, conference or roadshow, the Company will disclose in a Regulation FD-compliant manner, any material information that is not already public and which may be discussed or presented at the meeting, conference or the roadshow.

IX. Inadvertent Disclosures

If it is determined that material nonpublic information may have been disclosed unintentionally, the legal department should be notified immediately. If it is determined that



an inadvertent disclosure of material nonpublic information has occurred, a press release (accompanied by a current report on Form 8-K) will be issued disclosing the information no later than either 24 hours after discovery of the unintentional disclosure or prior to the commencement of the next day's trading on the NYSE, if later.

X. Rumors: No Comment Policy

The Company will not comment on market rumors in the normal course of business. When it is learned that rumors about the Company are circulating, Authorized Representatives should state only that it is Company policy to not comment on rumors. If the source of the rumor is found to be internal, the legal department should be consulted to determine the appropriate response.

XI. Social Networks

Use of social networks, including corporate blogs, employee blogs, Facebook, X, TikTok, YouTube, LinkedIn, and other non-traditional means of communications, to disclose material, nonpublic information may be considered selective disclosure.

XII. Violations of this Policy

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 civil money penalties. Any violation of this Policy by a director or employee shall be brought to the attention of the legal department.

(Amended and Restated October 24, 2024)