

Bowman

WHISTLEBLOWER POLICY

August 15, 2024

Bowman

Scope

This Whistleblower Policy (the "Policy") applies to all directors, officers, employees and temporary workers (collectively, "Employees") of Bowman Consulting Group Ltd. and its subsidiaries and affiliates (collectively, "Bowman Consulting," "we," "us," "our," or the "Company").

All Employees are required to comply with applicable whistleblower laws and with the Company's Code of Ethics and Business Conduct (the "Code"). As an additional measure to support our commitment to ethical conduct, the Audit Committee of our Board of Directors (the "Audit Committee") has adopted the following policies and procedures for (1) the receipt, retention, and treatment of complaints received by the Company regarding accounting, internal controls, auditing matters or violations of the Code; and (2) the confidential, anonymous submission by Employees of concerns regarding questionable accounting or auditing matters, commonly referred to as whistleblower procedures.

Purpose

Bowman Consulting is committed to its cultural values and to conducting its business affairs in accordance with the Code and applicable laws. As part of this commitment, Bowman Consulting provides a mechanism for Employees to report suspected wrongdoing or dangers in relation to Bowman Consulting's activities, and to have those concerns addressed in a timely and confidential manner. In scenarios where one Employee suspects another Employee of wrongdoing, or has other concerns covered by the Code, that Employee should refer to this Policy and to the Code on the appropriate course of action.

Personnel Responsible for the Policy

The Audit Committee has overall responsibility for this Policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this Policy. The Compliance Committee, consisting of the Chief Operating Officer, the Chief Legal Officer, and the Chief People Officer, is responsible for administering this Policy on behalf of the Company. All Employees are responsible for the success of this Policy and should ensure that they use it to disclose any suspected danger or wrongdoing, in line with the procedures set forth herein and in compliance with applicable legislation.

Types of Whistleblowing Concerns

Bowman Consulting is committed to conducting its business with honesty and integrity, and all staff are expected to maintain high standards and act in accordance with the Code. Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to Bowman Consulting's activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment, and any breach of legal or professional obligations, as well as any concerns regarding questionable accounting or auditing matters (including deficiencies in internal controls). It also includes any other matter detailed in the Code. Any suspected wrongdoing should be reported as soon as possible.

Reporting of Whistleblowing Concerns or Complaints Regarding Accounting, Internal Controls, or Auditing Matters

If an Employee has a whistleblowing concern, Bowman Consulting hopes that in most cases they will feel able to raise those concerns with their supervisor. However, where they prefer not to raise it with their supervisor for any reason, they should contact one or more members of the Compliance Committee. The Compliance Committee will promptly arrange a meeting with the Employee as soon as possible to discuss their concerns. If a member of the Compliance Committee is the subject of the Employee's concerns, the Employee should contact any member of the Audit Committee.

Investigation and Outcome

Once an Employee has raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform the Employee of the outcome of our assessment. The Employee may be required to attend additional meetings in order to provide further information. In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimize the risk of future wrongdoing.

We will aim to keep the Employee informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving the Employee specific details of the investigation or any disciplinary action taken as a result. The Employee should treat any information about the investigation as confidential.

Confidentiality

Bowman Consulting hopes that Employees will feel able to voice whistleblowing concerns openly under this Policy. If Employees want to raise their concerns confidentially, Bowman Consulting will make every effort to keep their identity secret and will only reveal it where necessary to those involved in investigating their concern.

Employees are not encouraged to make disclosures anonymously. Completely anonymous disclosures are difficult to investigate. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should speak to the Compliance Committee about their particular concerns so that appropriate measures can be taken to preserve confidentiality.

If Employees only feel able to raise concerns on an anonymous basis, they can do so by calling Bowman Consulting's confidential Reporting Hotline at 703-787-3400.

External Disclosures

The aim of this Policy and the Code is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. The Company believes that in most cases, Employees should not find it necessary to alert anyone externally.

The law recognizes that in some circumstances it may be appropriate for Employees to report their concerns to an external body, such as a regulator. It will rarely, if ever, be appropriate to alert the media. Bowman Consulting strongly encourages Employees to seek advice from the Compliance Committee before reporting a concern to anyone external. Again, if they wish to do so anonymously an Employee may contact Bowman Consulting's confidential Reporting Hotline at 703-787-3400.

This Policy provides a mechanism for the Company to be made aware of any alleged wrongdoings and address them as soon as possible. However, nothing in this Policy is intended to prevent any employee from reporting information to federal or state law enforcement agencies when an employee has reasonable cause to believe that the violation of a federal or state statute has occurred. A report to law enforcement, regulatory, or administrative agencies may be made instead of, or in addition to, a report directly to the Company through the Company's third-party reporting hotline or any other reporting method specified in this Policy.

Zero Tolerance for Retaliation or Malicious Acts

Employees who raise a whistleblowing concern or participate in good faith in any investigation must not suffer any form of retaliation or victimization as a result. Bowman Consulting will treat very seriously any acts of victimization or retaliatory action taken against Employees who, in good faith, raise a whistleblowing concern and/or participate in a whistleblower investigation. Victimization or retaliation in these circumstances is unlawful and any Employee who is found to have violated this provision will additionally be subjected to disciplinary action under Bowman Consulting's disciplinary procedure, including but not limited to dismissal.

Employees who feel they are being or have been victimized or retaliated against should report this immediately to their supervisor and/or to the Compliance Committee. However, if a whistleblowing concern is found to have been deliberately falsified or made maliciously or in bad faith, the Employee concerned may be subjected to disciplinary action under Bowman Consulting's disciplinary procedure, including but not limited to dismissal.