

ARHAUS, INC.
CORPORATE DISCLOSURE POLICY

1. Purpose.

It is the goal of Arhaus, Inc. (the “*Company*”) to provide timely, consistent and reliable disclosure of information to the public, within legal and regulatory requirements including, but not limited to, Regulation FD (Fair Disclosure) (“*Regulation FD*”) adopted by the Securities and Exchange Commission (the “*SEC*”), to foster orderly behavior in the financial markets. The purpose of this Corporate Disclosure Policy (this “*Policy*”) is to provide clear guidelines and procedures for receiving external requests for, and making disclosure of, material information to promote the Company’s disclosure goals.

The Company’s Chief Executive Officer (“*CEO*”), Chief Financial Officer (“*CFO*”) and General Counsel (collectively, the “*Authorized Persons*”), with assistance from the Company’s Disclosure Committee (the “*Disclosure Committee*”), will interpret and enforce this Policy and make materiality and distribution determinations with respect to the information disclosed about the Company. All questions about this Policy should be directed to the CFO. Any suspected or known violations of this Policy should be reported immediately to the CFO and the CFO must pre-approve in writing any deviation from this Policy.

2. Scope.

This Policy applies to all directors, officers, employees and other parties authorized to act on behalf of the Company. It covers the following types of disclosures and activities:

- (a) periodic and current reports, proxy statements, information statements, registration statements, and any other information filed with or furnished to the SEC;
- (b) news and earnings releases and related conference calls;
- (c) letters to stockholders;
- (d) speeches and public statements by senior management or directors;
- (e) information contained on the Company’s website;
- (f) social media communications including investor message boards, corporate blogs, chat rooms, Facebook, Twitter, LinkedIn and any other similar forms of communication;
- (g) oral statements made in group and individual meetings and phone calls with analysts and current or potential investors;
- (h) interviews with the media as well as news conferences;
- (i) press releases containing financial information, earnings guidance, information about material acquisitions or dispositions or other information material to the Company’s securityholders;
- (j) responding to market rumors; and
- (k) referring to or distributing analyst reports on the Company.

3. General Procedures.

(a) Securities Market Participants. Regulation FD prohibits the selective disclosure of material nonpublic information to certain specified persons. Selective disclosure occurs when the Company, or any person acting on its behalf, intentionally releases material nonpublic information about the Company to any of the following persons before such information is disclosed to the general public (the following persons are referred to collectively as “*Securities Market Participants*”):

- (i) Any securities market professional, including:
 - (1) Broker-dealers and persons associated with them, including investment analysts;
 - (2) Investment advisers, certain institutional investment managers and their associated persons; and
 - (3) Investment companies, hedge funds and affiliated persons; or
- (ii) Any security holder under circumstances in which it is reasonably foreseeable that the security holder would purchase or sell the Company’s securities on the basis of the information.

Communications to Securities Market Participants include broad communications to the general public, including through social media, that might reach Securities Market Participants.

(b) Intentional Disclosure. Regulation FD requires issuers who intentionally disclose material nonpublic information to a Securities Market Participant to simultaneously make a public disclosure in a manner consistent with Regulation FD. Disclosure is “*intentional*” when the person making the disclosure either knows, or is reckless in not knowing, that the information being communicated is both material and nonpublic.

(c) Unintentional Disclosure. If the Company learns that it (or certain persons acting on its behalf) has unintentionally disclosed material nonpublic information, the Company must promptly publicly disseminate the information no later than 24 hours after discovering the unintentional disclosure or at the commencement of the next day’s trading on the Nasdaq Stock Market, whichever is later. If any person believes that material nonpublic information has been disclosed other than in compliance with this Policy, that person should contact an Authorized Person immediately.

(d) Disclosure Methods. Public disclosure may be made by one of the following methods (“*Disclosure Methods*”):

- (i) Issuing a press release to major news wires.
- (ii) Furnishing or filing a Current Report on Form 8-K with the SEC.
- (iii) Conducting a conference call or webcast in a manner that provides broad, non-exclusionary access to the public after appropriate prior notice (normally by means of a press release issued to all major news wires or Form 8-K). Prior notice should generally occur at least one week before the event. In the event that it is not practical, due to unforeseen circumstances, to issue a press release or Form 8-K at least one week prior to any call or webcast, a shorter period may be approved by

the Authorized Persons, if the press release or Form 8-K includes adequate information about the material subject matter of the meeting or the call.

- (iv) Utilizing another method or combination of methods of disclosure that is reasonably designed to provide broad, non-exclusionary distribution of the information to the public. These methods must be reviewed and approved by the Authorized Persons on a case-by-case basis.

Merely posting information on the Company's website or disseminating it through social media will not, generally speaking, constitute "public disclosure" under this Policy.

Although communications in the ordinary course of business with customers, suppliers, strategic partners and government agencies are generally not covered by Regulation FD, all employees should act to safeguard and maintain the confidentiality of Company information and avoid disclosure of material nonpublic information unless necessary and unless a confidentiality agreement is in place. Disclosure of information to a person who is subject to a confidentiality obligation is not a violation of Regulation FD.

(e) Spokespersons. The CEO, CFO and the SVP of Investor Relations are designated as the primary spokespersons for the Company (each, a "*Spokesperson*" and collectively, the "*Spokespersons*"). Such other persons may also be designated as spokespersons for the Company to respond to specific inquiries, including any investor relations firm engaged by the Company, subject to the express prior approval of a Spokesperson specifically obtained for the particular communication. Where such express approval is granted, such other persons will be considered Spokespersons only with respect to the particular communication for which approval has been granted.

4. Additional Procedures.

(a) Materiality and Public Disclosure of Significant Company Information.

Any time a Spokesperson decides to disclose or discuss nonpublic Company information with anyone who is or might be a Securities Market Participant or any broader group that includes or may include a Securities Market Participant, the Spokesperson should consult with the other Authorized Persons and, where appropriate, legal counsel, to determine whether the information is material.

To the extent practicable, Spokespersons should be accompanied by a representative of the Legal Department familiar with Regulation FD or another Spokesperson at conversations with any Securities Market Participant. It should be determined in advance whether it is intended that any material nonpublic information be disclosed. If so, the material nonpublic information should be disclosed prior to or simultaneously with the planned conversation to the public in a manner consistent with Regulation FD.

In general, a fact about a company is considered "*material*" if there is a substantial likelihood that a reasonable investor would consider it important in deciding to buy, sell or hold a security. In other words, information that is reasonably likely to have a significant effect on the market price of the security is material. In this regard, potential market reaction or sensitivity to the information is a key consideration. Moreover, although multiple pieces of information may not be material individually, if the aggregate effect of those pieces, when they become public, would alter the "total mix" of available information and result in a reevaluation of the issuer's securities, then such pieces of information are considered material. Both positive and negative information may be material. The determination as to materiality depends on the facts and circumstances and it is very difficult to define each and every category under this heading. However, information and events that should be considered sensitive and potentially material includes, but is not limited to, the following:

- (i) Financial results;
- (ii) Future earnings or losses, management guidance as to future financial results or significant events and milestones and likelihood of achieving or not achieving that guidance;
- (iii) Information of a pending or proposed merger or acquisition of a business or assets, or sale or divestiture of a business or assets;
- (iv) Major changes in senior management;
- (v) Significant developments involving corporate relationships, including with manufacturers, suppliers and distribution channels;
- (vi) Changes in dividend policy;
- (vii) Stock dividends or splits or other corporate reorganization or restructuring events;
- (viii) Securities offerings (potentially including securities offerings by management or significant stockholders) and other financing or capital raising transactions;
- (ix) Changes in financial liquidity and other information related to financial condition;
- (x) Developments (whether positive or negative) in pending litigation;
- (xi) Significant litigation exposure due to actual or threatened litigation;
- (xii) Significant cybersecurity or data privacy breaches or systems interruptions;
- (xiii) Sales channel or product development milestones, such as significant capacity or store footprint changes, new contracts, partnerships or eCommerce developments;
- (xiv) Strategic initiatives or changes, such as entry into a new line of business, announcement of new product offerings and entry into other agreements or other contracts with business entities.

If information to be disclosed is deemed material, it must be disclosed through a Disclosure Method before or at the same time that the information is disclosed to Securities Market Participants. The Board should be kept aware of material developments and significant information disseminated to the public. In addition, Board members and other insiders will be apprised of material developments the Company is not ready to announce publicly in order to avoid premature or selective disclosure or inadvertent insider trading.

(b) Pre-Written Presentations, Investor Meetings and Inquiries.

Pre-written speeches, written statements, presentations and other external communications should be reviewed by the Authorized Persons and the Disclosure Committee and, where appropriate, legal counsel, unless the communication merely refers to a previously approved communication (e.g., a posting on social media that a press or earnings release has been issued). It is the Company's policy to publicly disclose material nonpublic information before discussing such information with the press.

Generally, any meeting with, or presentation to, members of the investment community or the media regarding financial or investment information should be conducted by one or more of the Spokespersons. Limiting the number of designated Spokespersons and having them present during any such meeting or presentation will assure responsiveness and continuity of communication, and minimize the risk of inconsistent messages or inadvertent disclosure. To the extent practicable, at least one other Company representative (in addition to the Spokesperson) should also be present to listen and note any statements or disclosures inconsistent with this Policy. As soon as practicable after the meeting, the

General Counsel should discuss with the Spokesperson any issues that were discussed that were not covered by the briefing materials.

Employees who are not Spokespersons should refer all external inquiries to the CFO. Under no circumstances should any attempt be made to handle these inquiries without prior authorization from a Spokesperson.

If inadvertent contact or communication occurs, the employee must immediately report the contact or communication and the matters discussed to the CFO to determine whether any inadvertent disclosure of material nonpublic information was made.

(c) Earnings Calls.

Adequate advance (generally at least a week) public notice shall be given of any quarterly earnings conference calls and/or webcasts. Notice should include a press release issued to the Company's wire service and a posting on the Company's website with the date, time, telephone number and webcast URL for the call or webcast. The press release should also state the period for which a replay of the call or webcast will be available. A copy of the release must be provided to the Nasdaq, to the extent required under its rules and regulations, prior to issuance. Before the conference call, the Company will publicly issue its quarterly or annual earnings press release and will generally furnish the same to the SEC on a Current Report on Form 8 K.

A quarterly earnings call or webcast must be open to analysts, media representatives and the general public. Any such call or webcast must be reflected in a transcript or otherwise recorded and kept by the Company in its internal records for at least one year. The Company will ensure that the date of the conference call and the oral forward-looking statement safe harbor legend is recited at the beginning of the call or webcast and included in the recording so that the date of the information discussed in the call or webcast is unmistakable to listeners. This practice reinforces the historical nature of the information discussed in the call or webcast.

Following any earnings or other investor call or public comment, the Company will not provide material nonpublic information or elaborate in a material way beyond what was covered during the call or public comment.

(d) Guidance, Quiet Period and Analysts.

At its sole discretion, the Company may publicly disclose estimates and/or projections relating to the Company's future earnings, performance or operations. The Company may provide guidance in its quarterly earnings releases or conferences or in other corporate communications. To the extent the Company provides any guidance, it will be done only through the Disclosure Methods and will constitute forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995.

The Company and its employees cannot give earnings guidance in any form (including providing "soft" or indirect guidance, "comfort" with respect to an earnings estimate or other guidance to "walk the street" up or down (i.e., suggesting adjustments to an analyst's estimates)) in nonpublic settings. Even just affirming (explicitly or implicitly) previously, publicly disseminated projections or Company guidance can violate Regulation FD. Authorized Persons asked to so affirm should follow the "no comment" policy.

To the extent practicable, analysts will be requested to provide a written agenda or questions in advance of meetings or calls to avoid inadvertent disclosures or to allow the preparation and simultaneous

public release of information the Company is willing to disclose. Any statements regarding earnings expectations will be limited to press releases, publicly available and adequately noticed earnings calls and Forms 8-K. In response to any question about the earnings expectations, Spokespersons should say only that it is the Company's policy not to comment on projections.

The Company will observe a "*quiet period*" during which it will not comment on the Company's financial outlook. Unless the Authorized Persons determine otherwise, the quiet period will begin, and the Company will no longer comment on its financial outlook, two weeks after the later of the Company's periodic earnings disclosure by earnings release or on Form 10-K or Form 10-Q. Unless the Authorized Persons determine otherwise, the Company should avoid analyst meetings and substantive communications in the time period between the end of a quarter and the announcement of earnings results for that quarter due to the heightened risk of inadvertent disclosure of material nonpublic information in this time period.

To the extent practicable, at least two Company representatives should participate in meetings with analysts (whether two Spokespersons or a Spokesperson and at least one other Company representative) to ensure that no statements or disclosures inconsistent with this Policy are made or, to the extent there is an inadvertent statement or disclosure that is not consistent with this Policy, it can be promptly addressed.

The Company's policy is not to comment on analysts' reports or projections other than to correct historical factual errors based on publicly available information. The Company regards analyst reports as proprietary information belonging to the analyst's firm and will not post copies on the Company's website or distribute copies to members of the investment community, stockholders or the media. This avoids the appearance of endorsing any specific report and the potential obligation to distribute negative reports along with positive reports. Under no circumstances should the Company, through a review of an analyst's model or report, communicate material, nonpublic information.

All analyst reports on the Company and available industry reports will be provided periodically to the Board and executive officers. The Company will provide a list of analysts who follow the Company for interested parties to contact directly. The Legal Department should keep a record of any comments provided on an analyst's report.

(e) News Releases.

The Company has developed and intends to maintain the following routine procedure for all significant corporate communications, including but not limited to financial or investment matters: (i) draft a news release; (ii) circulate it for review to the Authorized Persons, the Disclosure Committee, the Director of Investor Relations and other executive officers and to legal counsel and the Company's independent auditor, if appropriate; and, (iii) once approved and ready for release, alert the Nasdaq, to the extent required under its rules and regulations, at least ten minutes prior to transmitting it to the Company's wire service. The Company will retain a copy of the news release as part of its disclosure records. Normally, news releases will be transmitted before or after normal trading hours.

(f) Correcting Inaccurate Disclosure and Responding to Market Rumors.

If a director, officer or employee of the Company learns of information that causes him or her to believe that a disclosure may have been misleading or inaccurate when made or may no longer be true, such person should report that information without delay to the CFO.

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, Spokespersons should state only that it is Company policy to not comment on rumors.

When unusual stock price or trading volume activity occurs which is not attributable to a Company press release or statement, the response to inquiries should be the following or substantially similar: "The Company has not released any news or made any announcements that might account for the activity in our stock." This response will offer legal protection and avoid unintentional selective, inappropriate, incomplete, inaccurate or misleading disclosures.

Notwithstanding the foregoing, in the event of unusual market activity or unusual variations in the prices of the Company's securities, especially during periods of material developments or consideration of significant corporate matters, or if the Nasdaq requests that the Company make a definitive statement in response to a market rumor that is causing significant volatility in the Company's stock, the Authorized Persons and, if possible, legal counsel, will be consulted as to whether an exception should be made to the general policy regarding responding to market rumors, especially when the rumors may be associated with statements or actions by directors, officers, employees or other representatives of the Company. In the interim period before counsel can be consulted, the response should be a firm "no comment" with the speaker declining to say more.

(g) Use of Social Media and Personal Communications.

Use of social networks, including corporate blogs, employee blogs, investor message boards, chat boards, Facebook, LinkedIn, Twitter, YouTube and any other non-traditional means of communication, to disclose material, nonpublic information is considered selective disclosure and would violate this Policy.

Employees posting on personal social media channels or making other personal communications are not permitted to disclose confidential Company information or other information intended for internal use and are always expected to communicate in a professional and responsible manner.

Employees posting on personal social media channels or making other personal communications must not post any comments regarding the Company, except for promotional communications by authorized personnel that do not include business information about the Company. The Company may monitor what others are saying about the Company in online chat rooms, forums and social media platforms. However, the Company will generally not respond to any business-related rumors or correct any inaccuracies that might appear unless required to do so by law or by regulators.

5. Forward-Looking Information.

The Authorized Persons will review with the Board from time to time the nature of financial guidance or other forward-looking information it provides to the public. Forward-looking information is subject to known and unknown risks and uncertainties that could cause actual results to differ and will be accompanied by appropriate cautionary disclosure about factors that may be impact such forward-looking information.

6. Monitoring the Company's Website.

The CFO is responsible for placing investor-related information on the Company's website and, with assistance from the Disclosure Committee, for monitoring all Company information on the website to ensure it is accurate, complete and up-to-date. Any material changes in information must be updated immediately. Material, nonpublic information may not be disclosed by posting that information on the Company's website without concurrently disclosing that information by one of the Disclosure Methods.

7. Violations of this Policy.

Violations of Regulation FD are subject to SEC enforcement actions, which may include an administrative action seeking a cease-and-desist order, a civil action against the Company or an individual seeking an injunction and/or civil monetary penalties. Because of the serious nature of Regulation FD violations, any violation of this Policy by a director or employee shall be brought to the attention of the CFO and may constitute grounds for discipline, including termination of service.