COMPOSECURE, INC.
CORPORATE GOVERNANCE GUIDELINES

Effective September 23, 2025

The Board of Directors (the "***Board***") of CompoSecure, Inc. (the "***Company***"), acting on the recommendation of its Nominating and Corporate Governance Committee, has adopted these Corporate Governance Guidelines in order to codify internal Board policies and procedures. As such, they reflect the Board's current views with respect to certain matters of Board composition and practice and are subject to change from time to time. They do not establish legal duties of the Board or any committee.

1. Role of the Board

The role of the Board is to promote the best interests of the Company and its stockholders by overseeing the management of the Company's business, assets, and affairs. The Board is not expected to assume an active role in the day-to-day management and operations of the Company.

2. Size of the Board

The Board shall determine the appropriate size of the Board from time to time, provided that the Board size must comply with the limits specified in the Certificate of Incorporation and Bylaws of the Company and, to the extent applicable, that certain Governance Agreement, dated as of September 17, 2024 by and among the Company and the parties thereto (as amended, modified and/or supplemented from time to time).

3. Board Member Qualifications

The Board is responsible for periodically determining the appropriate skills, perspectives, experiences, and characteristics required of Board candidates, taking into account the Company's needs and current make-up of the Board. This assessment should include appropriate knowledge, experience, and skills in areas deemed critical to understanding the Company and its business; personal characteristics, such as integrity and judgment; and candidates' commitments to the boards of other companies. Each Board member is expected to ensure that other existing and planned future commitments do not materially interfere with the member's service as a director and that he or she devotes the time necessary to discharge his or her duties as a director.

4. Mix of Inside and Independent Directors

To the extent required under applicable rules of the Securities and Exchange Commission ("***SEC***") and the New York Stock Exchange ("***NYSE***") from time to time, the Board must be composed of a majority of directors who qualify as "independent directors" under the standards set forth by the SEC and NYSE.

The Board believes that it may be beneficial and appropriate to have the Chief Executive Officer as well as other members of management serve as directors where appropriate. The Board, in consultation with the Nominating and Corporate Governance Committee, should review annually the relationships that each director has with the Company (either directly or as a partner,

stockholder, or officer of an organization that has a relationship with the Company). Following such review, the Board shall make an affirmative determination with respect to each director's independence, taking into account all relationships considered by the Board with respect to such director, provided that in all circumstances the Board's determination of independence shall be consistent with the applicable rules of the SEC and NYSE.

5. Director Orientation and Continuing Education

The Board and the Company will develop and maintain an orientation process for new directors and ongoing education for existing directors that in each case may include, in the discretion of the Board, written material, meetings with appropriate members of senior management and outside advisors, and visits to Company facilities.

6. Term Limits

In order to avoid losing the contribution of directors who have been able to develop, through years of service on the Board, greater insight into the Company and its operations and who continue to make a significant contribution to the Board as a whole, the Board has not established arbitrary term limits. As an alternative to term limits, the Board believes that it can ensure that the Board continues to evolve and adopt new viewpoints through the evaluation and selection process described in these Corporate Governance Guidelines.

7. Board Access to Senior Management

Board members will have complete access to the Company's senior management. To the extent practicable, Board members will coordinate such access via the Executive Chairman of the Board and will use judgment to be sure that such contact is not distracting to the business or operations of the Company.

8. Outside Advice

The Board, or a committee of the Board, should be able to communicate directly with the Company's principal external and internal advisors (including its auditors, inside and/or outside legal counsel, and, when such relationships exist, investment banking and compensation advisors). It is noted that a primary function of the Audit Committee is to provide a direct communication channel to the Board for the Company's public accountants and others.

Further, there may be occasions when an outside advisors should be specially retained to assist the Board or a committee in connection with a particular matter, and the Company shall pay any fees and expenses of such advisors.

9. Executive Sessions of Independent Directors

The independent directors shall meet in executive session without management present at least twice per year.

10. Board Interaction with Institutional Investors, the Press, Customers, and Suppliers

The Board believes that management speaks for the Company. Individual directors (other than the Executive Chairman of the Board) are not authorized to be a spokesperson for the Company and, particularly when market sensitive information is involved, should avoid responding to inquiries. A director normally should refer investors, market professionals, and the media to the Executive Chairman of the Board, the Chief Executive Officer or other individual designated by the Company. If comments from the Board are appropriate, they should, in most circumstances, come from the Executive Chairman.

11. Committees of the Board

The current committees of the Board are: Audit Committee, Compensation Committee, and Nominating and Corporate Governance Committee. Each committee shall have its own charter, which will set forth the purposes, goals, and responsibilities of the committees and the qualifications for committee membership, procedures for committee member appointment and removal, committee structure, and committee reporting to the Board. Current versions of committee charters are available on the Company's website. The Board has determined that the current committee structure is appropriate, given the size of the Board. The Board may, from time to time, form new permanent and/or ad hoc committees or disband any of its committees, depending upon the circumstances and then applicable requirements of the SEC, NYSE and the Company's governing documents.

Subject to the requirements of the Company's governing documents, the Board shall determine committee membership based upon the recommendation of the Nominating and Corporate Governance Committee, after consultation with the Executive Chairman, and in making such determination, may take into account such factors as deemed appropriate by the Board. The Board does not have a policy of a mandated rotation since there may be reasons at a given point in time to maintain an individual director's committee membership(s) for a longer period of time.

12. Selection of Committee Chairs

The Board shall be responsible for the selection of committee chairpersons, based upon the recommendation of the Nominating and Corporate Governance Committee, after consultation with the Executive Chairman of the Board. The Board does not have a policy of a mandated rotation since there may be reasons at a given point in time to maintain a director's position of committee chairperson for a longer period of time.

13. Selection of New Director Candidates

The Nominating and Corporate Governance Committee is primarily responsible for identifying directors to fill vacancies on the board (subject to the rights, under the Company's governing documents or otherwise, of any parties to nominate candidates for director). The Nominating and Corporate Governance Committee is also responsible for reviewing candidates submitted by stockholders for consideration and may establish procedures for evaluating those candidates.

14. Former Chief Executive Officer's Board Membership

When the Chief Executive Officer resigns from that position, he/she should offer his or her resignation from the Board at the same time. Whether the individual continues to serve on the Board is a matter for discussion at that time with the new Chief Executive Officer and the Board (taking into account the recommendation of the Nominating and Corporate Governance Committee). A former Chief Executive Officer serving on the Board will not initially be considered an independent director. Such former Chief Executive Officer's status shall be periodically reviewed to evaluate the continued appropriateness of classifying him/her as a non-independent director.

15. Directors Who Change Their Job Responsibility

In the event of a material change in a director's qualifications or status, such as a change in employment or position with an existing employer, he or she should notify the Board and the Board may request such director to voluntarily offer his or her resignation.

Such a director should not necessarily leave the Board. There should, however, be an opportunity for the Board (based upon the recommendation of the Nominating and Corporate Governance Committee) to review the continued appropriateness of Board membership under the circumstances.

16. Retirement Age for Directors

The Board does not have a mandatory retirement age.

17. Equity Ownership

The Board recognizes that stock ownership by directors may strengthen their commitment to the long-term future of the Company and further align their interests with those of the stockholders generally. Non-Employee directors are ordinarily expected over a reasonable time to beneficially own shares of the Company's common stock having a value of at least five times their annual cash retainer (where a director's ownership for such purposes shall include all shares beneficially owned as defined under the Securities Act of 1933, as amended, including shares owned outright and restricted stock units that remain subject to time-based vesting conditions, other than unexercised stock options, whether or not vested, and any unvested awards subject to performance-based vesting criteria). The Board shall also adopt and approve management ownership guidelines for executive officers, with such terms as determined appropriate by the Board in its discretion.

18. Executive Chairman of the Board

The Board does not have a policy with respect to the separation of the offices of Chief Executive Officer and Executive Chairman of the Board.

19. The Chief Executive Officer and Outside Boards

The Chief Executive Officer will advise the Board, in advance, of his or her desire to accept a position on any for-profit or non-profit board. The Compensation Committee will be primarily responsible for determining whether such board service is appropriate under the circumstances.

20. Directors Serving on Other Boards

Directors should advise the Board when they intend to accept a position on another Board. Service on other Boards is one of the factors considered by the Nominating and Corporate Governance Committee in evaluating candidates for nomination for election or re-election to the Board. No member of the Audit Committee may serve on the audit committee of more than four public companies, including the Company, unless the Board has determined that such simultaneous service would not impair the ability of such member to effectively serve on the Audit Committee.

21. Evaluating Board Processes and Performance

The Board should meet at least annually to assess the Board's processes and performance. During this assessment, the directors will evaluate the Board's contribution and review areas in which the Board and/or management believes a better contribution could be made. If desired by any director, the independent directors will meet in executive session to discuss Board processes and performance without the Chief Executive Officer or any other management directors in attendance.

The Nominating and Corporate Governance Committee is responsible for evaluating individual Board members at the time they are considered for re-nomination to the Board.

22. Management Evaluation

The Compensation Committee shall evaluate the performance of the senior management of the Company and shall present its determinations to the full Board in such manner as deemed appropriate by the Compensation Committee. The Board shall review any reports of the Compensation Committee to ensure that management's performance is satisfactory, and that management is providing the best leadership for the Company in the long- and short-term.

23. Succession

The Board, assisted by the Nominating and Corporate Governance Committee, oversees the Company's management succession planning. The Nominating and Corporate Governance Committee will develop and recommend to the Board for approval a CEO and executive officer succession plan, and will also review such plan from time to time as appropriate.

24. Director Compensation

The form and amount of non-management director compensation will be determined by the Board, upon the recommendation of the Compensation Committee. The Board and the Compensation Committee will critically evaluate all matters they deem relevant when determining the form and

amount of director compensation, including considering whether such compensation would affect the directors' independence under applicable requirements.

25. Scheduling and Selection of Agenda Items for Board Meetings

The Board will meet as appropriate. The Executive Chairman shall set the agenda for each Board meeting, taking into account input and suggestions from members of the Board. The Executive Chairman shall preside at meetings of the Board. In the absence of the Executive Chairman at a duly convened meeting, the Executive Chairman of the Board shall select a temporary substitute to serve as chair of the meeting.

26. Conflicts of Interest

If an actual or potential conflict of interest develops because of a change in a director's circumstances (for example, significant and ongoing competition between the Company and a business with which the director is affiliated), the director should report the matter promptly to the full Board and the Nominating and Corporate Governance Committee for evaluation and appropriate resolution.

If a director has a personal interest in a matter before the Board, the director shall disclose the interest to the full Board and the Audit Committee, shall recuse himself or herself from participation in the related discussion, and shall abstain from voting on the matter.

Directors must also comply with other applicable Company policies, including the Company's Code of Conduct and Statement of Policy for the Review of Transactions with Related Persons.

27. Disclosure

These Corporate Governance Guidelines will be made available on the Company's website. The Company will include a statement in its annual proxy statement indicating that a copy of these Corporate Governance Guidelines is available on its website and in print to any stockholder who requests a copy and specifying how such request be made.