



# Caf Code

Code of Conduct & Ethics





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## Message from our executive

# Hello!

Here at Caf, our goal is to provide technology services as a way to help our customers validate the identity of their customers, promoting more agile onboarding flows, limiting fraud and irregularities in their businesses. Therefore, a culture of compliance, ethics and integrity is part of our DNA.

Therefore, it is essential that everyone observes the provisions of our **Caf Code** while carrying out its activities, because each team member is responsible for our corporate culture, including the best corporate governance practices that promote the sustainability of our business.

**Jason Howard**

CEO





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## 1. Introduction

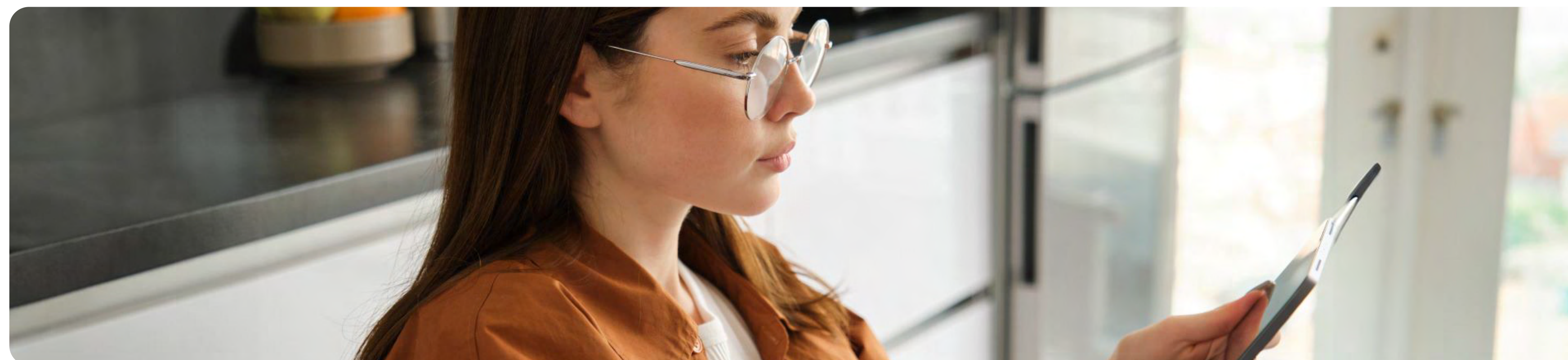
Combateafraude Tecnologia da Informação S.A. and its affiliated entities (hereinafter collectively referred to only as "**Caf**" or the "**Company**" for the purposes of this Code) is an organization that provides technology services for data analysis, used to automate user validation flows and combat irregularities and fraud. Given the nature of its services, it is essential that CAF conduct its business in compliance with the applicable laws and regulations and in accordance with a strict standard of business ethics.

Therefore, formalized in this Code of Conduct & Ethics (hereinafter referred to as "**Code**" for the purposes of this document) is the set of rules and values which reflect our organizational culture, and which must be observed by all members of your organization.

## 2. Objective

Our Code establishes values, principles and guidelines that guide the CAF. Observing them is the responsibility of all of us, our suppliers, third parties or anyone involved in our activities.

The guidelines we establish must be applied in conjunction with all applicable legislation, internal policies and procedures, seeking the highest standard of ethical conduct and transparency.



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## 3. Caf Global Culture

Our role is to live the values that guide our business, strengthens our teams, and supports our organization. The following are key elements of Caf's culture:



Caf fosters a culture of talented people who respect, understand, connect, and collaborate with one another. We are a team that seeks to grow, and work with autonomy, responsibility, Will d and empowerment.



Transparency, communication, and collaboration is how we seek to work together. Our relationships are based on trust, respect, transparency and sharing of mutual understanding.



We add value and support our customers. They are our first priority: we bring results and create a positive, timely impact.



We are responsible for achieving our goals, We are further guided by a strong sense of responsibility. We don't focus on blame, rather, we influence and work collaboratively to achieve our mission.



We act with focus and teamwork to deliver high quality standards and create the desired final impact. We are committed to delivering on our commitments and adapting our plans, without losing track of our deadlines or commitments.



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## 4. Coverage

The Code applies to:

- ✓ All Caf Employees, regardless of (i) area of performance, (ii) hierarchical level; (iii) headquarters, branch or country in which it is located.
- ✓ All third-party providers of goods and services that carry out their professional activities at Caf, regardless of the headquarters, branch or country in which they are located.

For the purpose of the Codewe define Employees and Third Parties as **“Caf Personnel”** or **“Personnel”**.





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## 5. Responsibilities

It is the responsibility of all **Caf Personnel** to:

- ✓ (i) Know the CAF Code as well as to participate in training on the Caf Code, current laws, information security requirements, and other Caf internal policies;
- ✓ (ii) Act in accordance with the guidelines described here;
- ✓ (iii) Inform the Compliance department or the Caf Ethics Channel of situations that do not comply with the provisions of the Caf Code;
- ✓ (iv) Collaborate with any investigations related to non-compliance with the Caf Code.

The **Caf Compliance** area is responsible for:

- ✓ (i) Interpreting and applying the provisions of the Caf Code;
- ✓ (ii) Dealing with instances (real or potential) of non-compliance with the Caf Code.
- ✓ (iii) Acting as an educational area on the Caf Code, by providing training and communications, whenever necessary.



Compliance Contact: [compliance@caf.io](mailto:compliance@caf.io)

Contact Caf Ethics Channel: **0800 800 0158** or <https://www.contatoseguro.com.br/caf>

We encourage cases of non-compliance with the Caf Code to be reported through the channels discussed in the Code. Caf does not tolerate any retaliation for reports or complaints in good faith.

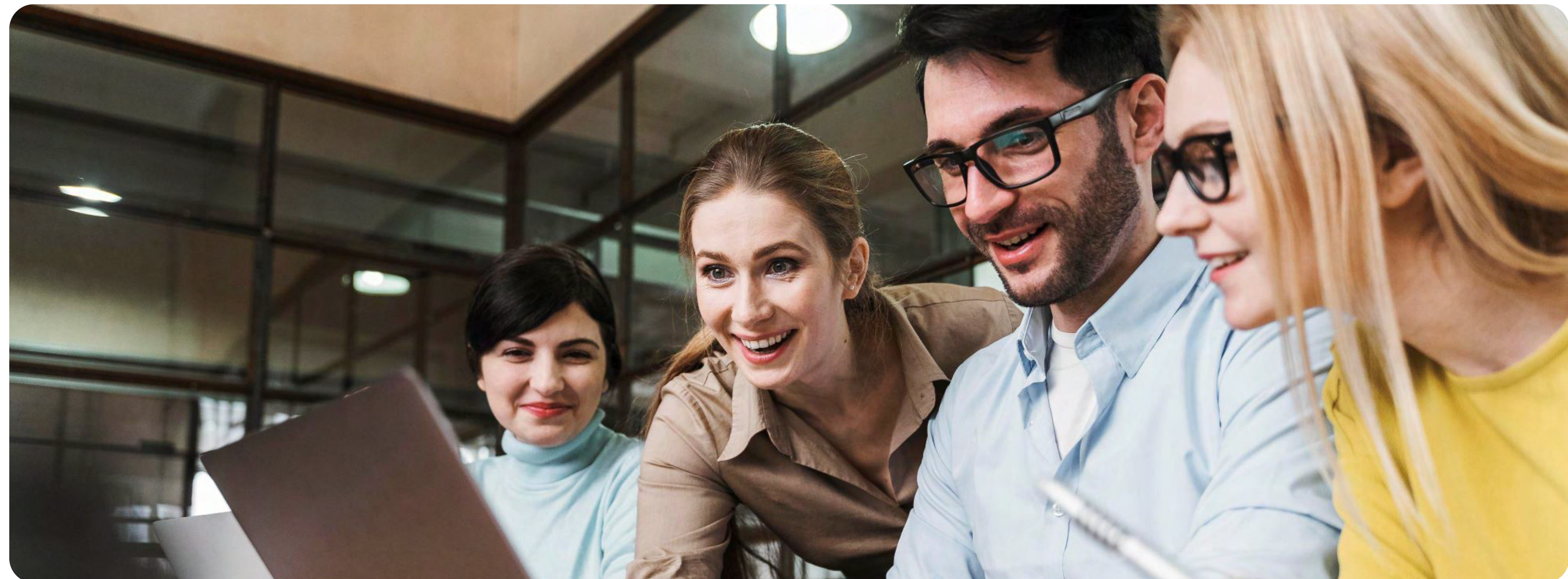


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## 6. Our Work Environment

We are committed to a healthy, ethical and honest working environment for everyone. Therefore, Caf Personnel must conduct themselves in a manner that focuses on integrity, respect, honesty, teamwork and adheres to the terms of the Code.





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## 7. Reputation Protection

We must always consider the reputation of Caf, all Caf Personnel, its partners and customers while carrying out our activities. Therefore, you must:

- ✓ (i) In your personal and professional relationships, take the necessary care not to expose Caf's internal and confidential matters.
- ✓ (ii) When browsing social media, be careful with posts that may expose Caf in a negative or unauthorized way. If you have any questions about the content you want to post, validate in advance;
- ✓ (iii) When carrying out your professional activities before customers, suppliers and other members of the community, seek to preserve your image and that of Caf, acting in a courteous, attentive and careful manner towards everyone.

## 8. Confidentiality

Caf Personnel have the obligation to maintain the confidentiality and secrecy of internal Caf information to which they have access. Without due consent and authorization for the information to be shared with third parties, you must not reveal it to anyone, nor even use such information for personal purposes. This obligation will remain in force even after the end of the employment contract or provision of services - as agreed in your applicable contract.

Caf has internal guidelines on the classification and appropriate use of information. If you have any questions, please contact our Information Security area through e-mail [infosec@caf.io](mailto:infosec@caf.io).



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## 9. Protection and Use of Assets

It is the responsibility of all Caf Personnel to protect assets (physical or digital) that are in their use and/or custody. Caf Personnel must:

- ✓ (i) Use Caf assets (assets, property, equipment, software, hardware, etc.) for professional purposes and guaranteeing the company's interests.
- ✓ (ii) Refrain from using Caf assets to commit illegal acts, encourage violence or criminalization and share inappropriate and/or offensive content.
- ✓ (iii) Refrain from creating or storing explicit material (i.e. adult-oriented content) on Caf's assets.
- ✓ (iv) Refrain from making video or audio recordings of meetings without prior authorization and/or consent.

- ✓ (v) Generate accurate and truthful records and reports, whether external or internal.
- ✓ (vi) Store data and information in locations recommended by the Information Security team.
- ✓ (vii) Follow such other requirements and guidelines put forth by the Caf Information Security Team.

Caf has internal guidelines on the use of technology resources. If you have any questions, please contact our Information Security or through e-mail [infosec@caf.io](mailto:infosec@caf.io).



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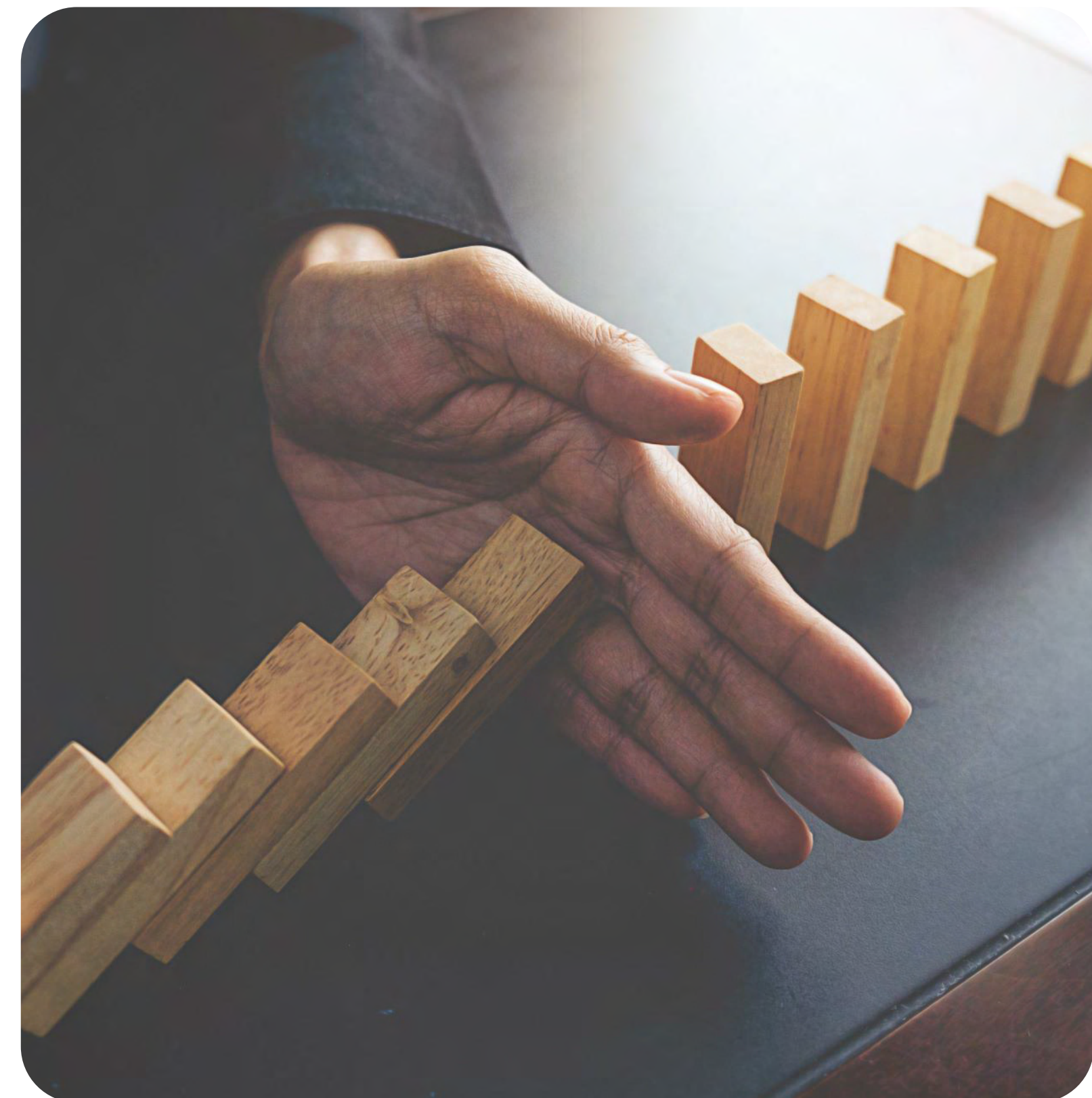
## 10. Conflict of Interest

A conflict of interest occurs when a person's private/private interest unduly conflicts with or influences their activities and decision-making related to the performance of their professional duties. Therefore, any situation that could generate a conflict (directly or indirectly) between the private interests of Caf Personnel and the interests of the Caf must be avoided.

Furthermore, the offering and/or receipt of undue advantages (regardless of the type or amount involved) by any Caf Personnel is strictly prohibited, especially when public officials/agents are involved.

*Note: Undue advantage can be defined as something, with or without any financial value, that is given to someone with the intention of inappropriately influencing a decision-making process.*

If Caf Personnel becomes aware of any situation that could be characterized as a conflict of interest, whether real or potential, they should immediately contact the Compliance department for guidance.








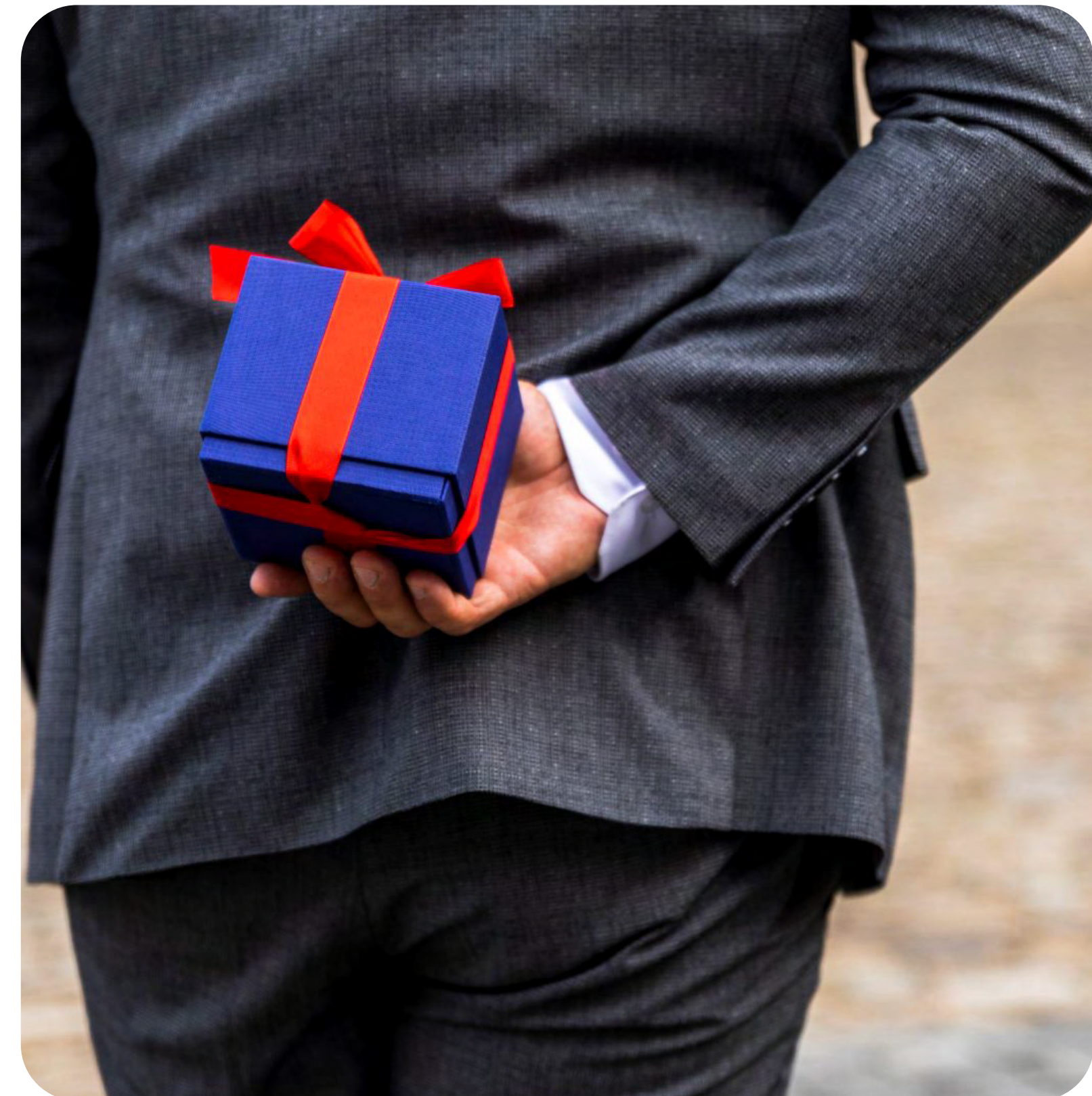
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## 10.1.1 Receiving/Offering Gifts, Presents and/or Hospitality

Caf Personnel must take the necessary care if they are involved in situations in which they are offered, or wish to offer a third party, gifts, presents and/or hospitality.

-  (i) **Gifts** These are items of low value, or of intangible value, that are normally used to promote the companies' brand. (Ex. pens, notepad, etc.)
-  (ii) **Presents** are goods or services, for individual use, that have significant or material value, and that are not classified as gifts.
-  (iii) **Hospitalities** These are expenses for meals, drinks, entertainment, transport, travel, tours, among others.





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## 10.1.1 Receiving/Offering Gifts, Presents and/or Hospitality

**It's forbidden** the receipt or offering of gifts, presents and/or hospitality, when:

- ✘ (i) There is ill intent, which could constitute a conflict of interest and/or bribery of a public or private official/agent;
- ✘ (ii) It is from/to public officials and/or agents, national or international, regardless of type or value;
- ✘ (iii) It is in cash or equivalent (e.g. cards, guarantees, etc.);
- ✘ (iv) It is recurring and has an exorbitant value, which does not reflect the normal conditions of a commercial relationship;
- ✘ (v) It is illegal.

As Caf Personnel, it **is permitted** accept or offer a gift, present or hospitality, provided that:

- ✔ (i) Do not disobey the rules described above;
- ✔ (ii) Be a normal part of the commercial relationship;
- ✔ (iii) Be modest;
- ✔ (iv) Be approved by your direct manager.

If the situation does not comply with the guidelines above, you may only accept or offer gifts, presents and/or hospitality with authorization from the Compliance department.



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## 10.1.2 About Charitable and/or Donation Requests

You must not, as Caf Personnel, (i) make a charitable request on behalf of Caf to charities that have no relationship with the company; (ii) request donations and/or charity donations to Caf from third parties, without authorization from the competent internal authority and the Compliance department.





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## 10.1.3 Personal and/or Family Bonds between Caf Personnel

If you have direct and/or indirect relatives who (i) work at Caf, whether or not in the same department as you or not; (ii) work for a company that has a commercial relationship with Caf; and/or (iii) are employees or public agents classified as Politically Exposed Persons (PPE), you must inform the department of Compliance.

We understand that interpersonal relationships contribute to a pleasant and collaborative work environment. We all form personal friendships and eventually there will be family and even romantic relationships with co-workers. However, such relationships must not interfere with professional favoritism or interference of any nature.

Caf does not allow decisions at Caf to be based on personal relationships and interests, which could be configured as a Conflict of Interest. As such, we do not permit a direct or indirect hierarchical reporting structure when there is an underlying relationship. If there are cases in this regard, Personnel must inform the Compliance department.

The Compliance department has the prerogative to assess the existence of a potential conflict of interest and take the necessary measures to assess the situation.





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## 10.1.4 Conducting External Activities

As Caf Personnel, it is not prohibited to carry out external activities (paid or unpaid), as long as it does not represent a conflict of interest (potential or real) with the professional activities you carry out with Caf.

If you carry out another professional activities, you must observe the following rules:

- ❌ (i) It is prohibited to carry out external activities during working hours at Caf;
- ❌ (ii) The use of Caf resources (e-mails, telephone, other IT resources, etc.), data and information to develop or promote its external activities is prohibited;
- ❌ (iii) It is prohibited to conduct external activities that affect your impartiality, judgment and/or conduct within Caf.

The Compliance department must be informed if you carry out external activities that violate the above guidelines.





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## 11. Legal Compliance

Acting in accordance with applicable legislation, whether national or foreign, is essential for a sustainable governance environment. As such, Caf does not tolerate illegal acts. It is the obligation of all Caf Personnel to act in accordance with the laws and rules applicable to their activities. Any non-compliance will be subject to the sanctions and penalties described in this Code or otherwise determined by Caf, without prejudice to the penalties provided for by law.

Caf's Legal department must be immediately contacted in case of doubts about the application of the laws and regulations that guide its activities, through e-mail **[legal@caf.io](mailto:legal@caf.io)**.





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## 11.1.1 Respect the Dignity of the Human Person

We repudiate any acts of violation of human dignity, of any type and in any circumstances. Therefore, we have zero tolerance for practices (actions or omissions) that are characterized - or could be characterized - as:



### Prejudice and/or discrimination

Related to race, skin color, religious option, sex, gender identity, age, origin, physical or mental disability, marital status, sexual orientation, political option or any other condition protected by law.



### Moral Harassment

Direct or indirect actions, in the work environment, carried out repeatedly by the aggressor, and which aim, mainly (i) to cause damage to the mental and emotional health of the victim; (ii) defame your image; (iii) make them feel incapable and/or unmotivated in carrying out their professional activities; and (iv) embarrass or coerce her.



### Sexual Harassment

Actions, repeated or not, that aim to violate the victim's privacy, against their will, to obtain sexual advantages. The practice does not necessarily need to involve physical contact between the aggressor and the victim, that is, verbal, written or gestural acts can also characterize the occurrence of sexual harassment.



### Child Labor, Slave or Slave-like Labor

We do not tolerate any form of exploitation of child labor, slave or slave-like labor in our facilities or operations, nor those of our suppliers. Likewise, we repudiate any act that involves prostitution or sexual exploitation.



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## 11.1.2 Respect and Attention to Diversity

We believe in an environment with diversity of opinions, backgrounds and experiences, in which all people feel welcomed and can perform to the best of their potential, develop and grow at Caf. For this reason, we respect and pay attention to Diversity, Equity and Inclusion.

## 11.1.3 Health, Safety and Wellbeing

We provide a healthy and safe environment for work, observing and complying with all applicable health and safety standards.

Caf Personnel are responsible for complying with the safety rules and practices applicable to their work, as well as taking the necessary precautions to protect other people. Accidents or unsafe conditions should be reported to the People Department.

It is prohibited for Personnel to work while intoxicated or under the influence of substances that could harm their performance, their relationships or compromise their safety. Furthermore, the use or possession of illicit substances, as well as the possession, storage or manipulation of weapons/ammunition of any kind on Caf premises, is expressly prohibited.





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## 11.1.4 Personal Data Protection

We operate in compliance with laws (national and foreign) related to the protection of personal data. In order to safely and effectively protect the data from Personnel, customers, partners and suppliers, Caf has a team that monitors and ensures compliance with the rules applicable to its activities..

Caf Personnel have the obligation to act in compliance with current data protection legislation, and to seek assistance from the Legal department or the Caf Data Officer (also known as DPO), in case of doubts or requests on the topic.



Legal Contact: [legal@caf.io](mailto:legal@caf.io)

Data Protection Officer - Responsible Contact (DPO): [dpo@caf.io](mailto:dpo@caf.io)





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## 11.2 Prevention of Corruption and Bribery

We have zero tolerance for corruption and bribery practices, and we want to maintain an honest and ethical relationship with government bodies (national or foreign), and act in compliance with national (Law 12,846/2013 - Brazilian Anti-Corruption Law) and foreign (FCPA - Foreign Corrupt Practices Act and UK Bribery Act) which establish guidelines on the subject.

Caf Personnel have the responsibility to act in accordance with the aforementioned laws during the development of their professional activities, and in accordance with the Caf Internal Policy on the prevention of corruption and bribery. Furthermore, you are required to:

- ✓ (i) Establish relationships with public agents based on ethics, professionalism and transparency, immediately reporting to Caf any form of pressure, offer or request contrary to these principles;
- ✓ (ii) Refrain from offering gifts, presents or any type of financial or non-financial advantage to any public agent or employee, in exchange for private benefits;
- ✓ (iii) Refrain from using an intermediary natural or legal person to hide or disguise the interests or identity of any person who may benefit from any illicit act committed;
- ✓ (iv) Refrain from making prior agreements or arrangements with competitors or associations representing competitors, which have the purpose of defrauding the competitive nature of procedures involving direct and indirect public administration.

Additionally, the following is strictly prohibited:

- ✗ (i) The involvement of Caf or any of its Personnel acting on its behalf, in party political activities, using Caf funds, facilities, or any resources to support, directly or indirectly, any candidate or political party.
- ✗ (ii) Making donations (of any type) to political parties, candidates for public office, religious institutions, individuals or organizations that represent or may represent a reputational risk to Caf.

Any and all situations that may represent a real or potential risk of corruption and/or bribery must be immediately reported to the Compliance department, or to the Caf Ethics Channel.



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## 11.3 Prevention of Fraud, Money Laundering and Terrorist Financing

We have as a premise to act in accordance with laws (national and foreign) that provide for the prevention of the crime of fraud, prevention of money laundering and financing of terrorism.

All Caf Personnel must work to mitigate and prevent risks involving such crimes, in accordance with current internal policies, in addition to reporting to the Compliance department, or the Caf Ethics Channel, any real or potential situation of fraud, money laundering and/or terrorist financing in Caf operations.





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## 11.4 Free Competition

Our relationship with competitors must comply, at least, with the following rules and guidelines:

- ✓ (i) Ensure fair competition and not engage in activities or businesses that are harmful to the consumer, public administration or society;
- ✓ (ii) Refrain from retaliation against competitors, collusion on prices, production capabilities, market sharing, sales territories or production programs and demonstrating attitudes that imply unfair competition;
- ✓ (iii) Refrain from entering into agreements with competitors that serve to restrict business with suppliers, or presenting fictitious offers in the context of bidding;
- ✓ (iv) Refrain from improperly obtaining and using confidential information from competitors; and
- ✓ (v) Refrain from engaging in any other activities which may be anti-competitive as determined by the Caf legal and compliance organizations.

Our success is due to the quality of our products and services but, above all, to the quality of our relationships with customers. All customer transactions must be conducted legally, ethically and in good faith. Caf Personnel must always be focused on customer needs, engaged in our value of "Customer Obsession".



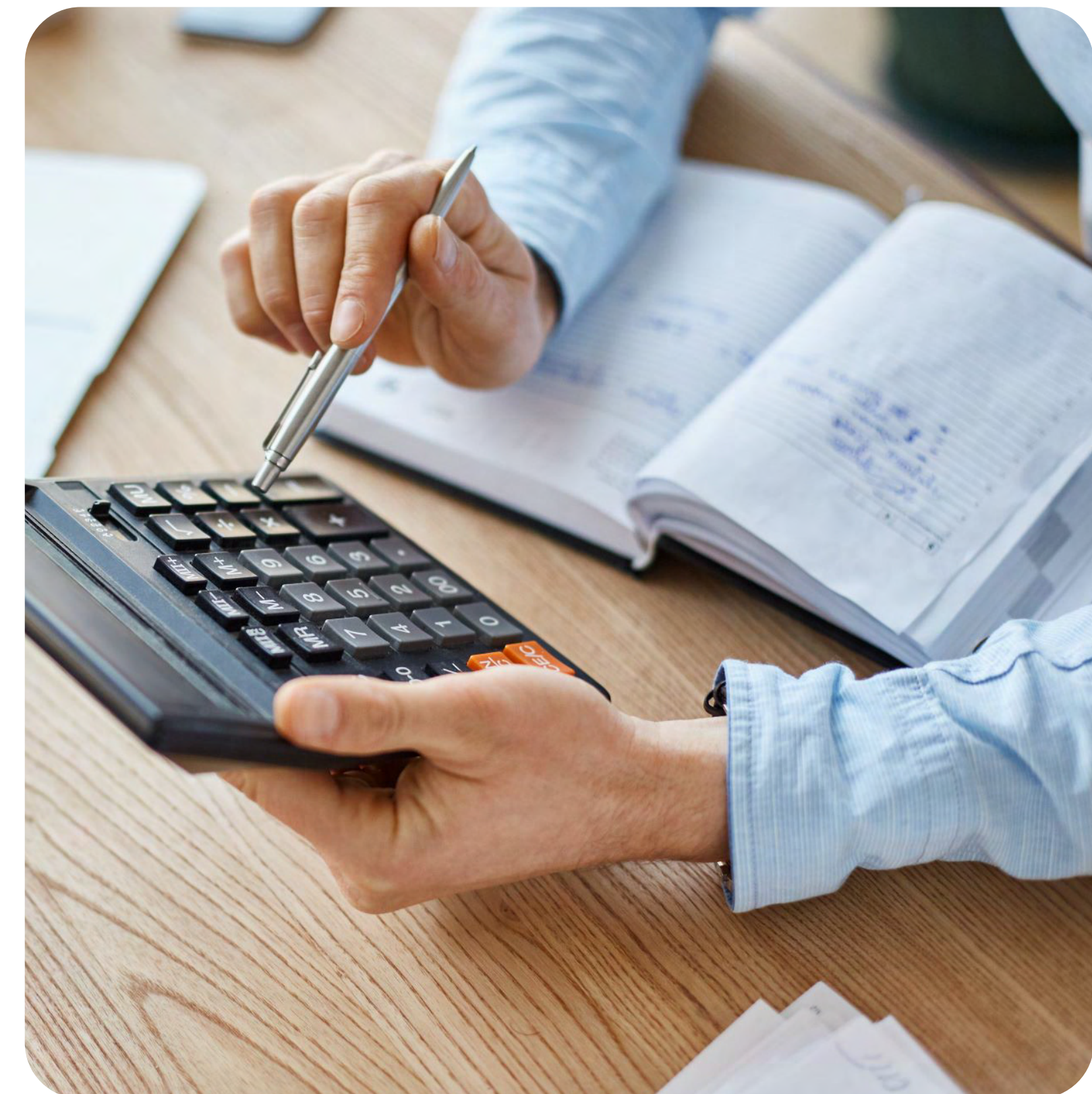
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## 11.5 Accounting and Financial Statements

Our accounting will be maintained in permanent records, in accordance with current accounting standards. We follow accounting rules to ensure that assets are protected and used appropriately, and that records and reports are accurate and reliable.

The Finance Department must ensure that accounting records created by them or under their responsibility, whether financial reports, accounting records, research reports, sales reports, purchase reports, expense accounts and other Caf documents, are complete, accurate, honestly reflect each transaction, income or expense and are generated in a timely manner and in accordance with applicable accounting rules and standards.





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## 12. Penalties

Violations of the rules established in this Code will be investigated and evaluated, and may be subject to the following penalties:

- ✓ (i) Verbal or written warning;
- ✓ (ii) Suspension;
- ✓ (iii) Dismissal with or without just cause;
- ✓ (iv) Immediate termination of the supply/services contract;
- ✓ (v) Filing of legal action.

It is the Caf's discretion to define which penalty will be applied for each specific case, considering the peculiarities and severity of each situation.

As Caf Personnel, it is important that you are aware of the penalties that may be applied in case of non-compliance with the Code.





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## 13. Validity

This Code will be in force for an indefinite period, but may be reviewed annually or whenever any relevant fact or event motivates its early review.

## 14. Version History

Version	Data	Description Changes	Produced by
1.0	2022	Inicial release	Legal, Privacy & GRC
2.0	10/2023	1 <sup>st</sup> review	Legal, Privacy & GRC People Information Security Marketing Financial
2.0	10/01/2024	Directors final approval	Legal, Privacy & GRC Directors



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### Annex I - Declaration of Consent

I declare that I have been provided and apprised myself of the **Caf's Code** and I undertake to act in accordance with its rules throughout the duration of my relationship with Caf, under penalty of the penalties described therein being applied.

Furthermore, I declare that I am aware that Caf has a reporting channel, known as **Caf Ethics Channel**, where I can report, confidentially and anonymously, about violations of this Code and current legislation.

**Date:**

**Name:**

**Signature:**

### Annex II - Contact List



**Caf Ethics Channel**

Site: [www.contatoseguro.com.br/caf](http://www.contatoseguro.com.br/caf)

Telephone: **0800 800 0158**



**Caf Compliance Department**

E-mail: [compliance@caf.io](mailto:compliance@caf.io)



**Caf Legal Department**

E-mail: [legal@caf.io](mailto:legal@caf.io)



**DPO - Data Protection Officer Caf**

E-mail: [dpo@caf.io](mailto:dpo@caf.io)



**Caf Information Security Department**

E-mail: [infosec@caf.io](mailto:infosec@caf.io)



**Caf People Department**

E-mail: [people@caf.io](mailto:people@caf.io)



# Caf Code

Code of Conduct & Ethics



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