



CODE OF ETHICS

MESSAGE FROM THE FOUNDERS

At Revelo, we believe prosperity comes from human connections and ethical choices.

This Code is not meant to be a rulebook for every situation. Instead, it lays out the core values and principles that should guide our decisions and behavior. Specific topics and procedures are addressed in complementary policies.

We invite everyone who is part of Revelo, directly or indirectly, to act in accordance with the ethical values described in this document. They have been crucial to getting us this far, and they will be crucial for the continuity and sustainability of our business and the impact it creates.

Revelo Founders



Lachlan Crespigny



Lucas Mendes

OUR PURPOSE & VALUES

Our purpose is clear: At Revelo, our mission is to accelerate the deployment and development of AI, leveraging the world's best tech talent, wherever they are. Our vision is to build the backbone of tech talent for the age of AI.

To achieve our mission and our vision, we are guided by the following values:



Try Things Fast to Learn Even Faster

We embrace rapid experimentation and continuous learning to accelerate growth and innovation. By testing quickly and learning from mistakes, we move faster and adapt effectively.

Keywords: experimentation, learning agility, risk-taking, adaptability.



One Team

We believe in collaboration across teams, empathy, and supporting one another.

Keywords: collaboration, empathy, team-oriented



Move-the-Needle Mindset

We focus on actions that truly move the needle, driven by data and aligned with purpose. By prioritizing impact over activity, we accelerate growth and efficiency in everything we do.

Keywords: impact, data-driven, prioritization, efficiency, purpose.



Be Resilient

We embrace challenges, adapt to change, and transform difficulties into opportunities.

Keywords: adaptability, perseverance, problem-solving.

OUR ETHICAL PRINCIPLES



Integrity in All We Do

We are honest and transparent in our actions. We comply with laws and regulations and avoid shortcuts that compromise ethics or reputation.



Respect and Fair Treatment

We treat everyone with dignity. We do not tolerate harassment, discrimination, or violence of any kind. Diversity and inclusion make us stronger.



Data and Information Protection

We safeguard company, client, and employee data and information. Confidentiality and privacy are central to our responsibility.

(Detailed in the Privacy Policy)



Conflict of Interest

We avoid situations where personal interests conflict with company interests. We do not pay or offer anything of value to any person for the purpose of influencing official actions or decisions, securing any improper advantage, or obtaining or retaining business or any other transaction. When in doubt, we disclose and seek guidance.

(Detailed in the Conflict of Interest Policy)



Responsible Use of Company Assets

We use company resources, systems, and brand responsibly and for legitimate business purposes.



Accountability and Transparency

We communicate clearly, honor our commitments, and take responsibility for mistakes. Transparency builds trust with our colleagues, clients, and partners.

SPEAKING UP

When in Doubt

Before taking action, ask yourself:

- Is this aligned with our values?
- Am I acting within the laws?
- Would I be comfortable if this became public?
- Could this decision harm Revelo, a colleague, or a client?

If the answer is unclear, seek advice from your manager, the People Team, or the Ethics Committee.

Ethics Channel - Reporting Concerns and Misconduct

At Revelo, we do not tolerate any cases of harassment, discrimination, corruption, fraud, safety violations, and conflicts of interest. We hope you will not encounter any such situations, however, should you, our ethics channel is available 24 hours a day, 7 days a week, in English, Spanish, and Portuguese.

The Revelo Ethics Channel can be accessed through:

- **Website:** <https://my.safe.space/company/revelo>
- **Phone:** 0800 887 0880
- **WhatsApp Message:** 0800 887 0880
- **Email Message:** ethics@revelo.com

Reports can be submitted anonymously and retaliation against those who raise concerns in good faith is strictly prohibited. The investigation and resolution process is outlined in the **Misconduct Reporting Policy**.

RESPONSIBILITIES

- **All Employees:** Follow this Code, uphold company values, and report concerns in good faith.
- **Leaders:** Set the example, foster an ethical culture, and support employees who raise questions.
- **Ethics Committee:** Oversees consistent and fair application of this Code, ensuring impartiality and accountability. *(Roles and procedures detailed in the Ethics Committee Policy)*

RELATIONSHIP WITH OTHER POLICIES

This Code provides guiding principles. It is complemented by specific policies, such as:

- Misconduct Reporting Policy
- Disciplinary Measures Policy
- Conflicts of Interest Policy
- Data Protection Policy
- Privacy Policy
- Ethics Committee Policy

Please note that these policies are under constant review to ensure they remain relevant and effective.

CONTINUOUS COMMITMENT

This Code will be reviewed regularly to reflect new challenges, regulations, and our company's evolution. Each employee is expected to reaffirm their commitment upon joining and periodically throughout their journey at Revelo.

TERM OF COMMITMENT TO REVELO'S CODE OF ETHICS

I, _____,

certify that I have received, read, and understood the Revelo's Code of Ethics. I am aware of the existence of specific policies and laws that complement the Code.

I declare that I am aware that the non-compliance with any of the rules set forth in the Code and Revelo's policies, as well as applicable current legislation, may result in the sanctions, in addition to possible legal implications.

If at any time, I become aware of any violation of the Code or legislation that has occurred or may occur in the future, I undertake to promptly report this information through one of the communication channels provided in the Code.

Full Name:

Document Number:

Area/Department:

Place and Date:

Signature:



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