

Certta Code

Code of Conduct & Ethics

Message from our executive

Hello!

Here at Certta, 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 **Certta 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

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1. Introduction

Combateafraude Tecnologia da Informação Ltda. and its affiliated entities (hereinafter collectively referred to only as "**Certta**" 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 Certta 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 Certta. 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.

3. Coverage

The Code applies to:

- All Certta 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 Certta, regardless of the headquarters, branch or country in which they are located.

For the purpose of the Codewe define Employees and Third Parties as "**Certta Personnel**" or "**Personnel**".

4. Certta 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 Certta's culture:

Better together: People are the foundation. Collaboration is how we win. We build high performance through trust, care, and shared ownership, creating an environment where people feel safe, supported, and empowered to move better together.

Transparency & Communication: Transparency & Communication is how we work together. Our relationships are built on trust, active listening, respect, and open sharing of context, feedback, and decisions.

Customer Obsession: Customer Obsession means relentlessly solving the right customer problems with rigor, speed, and long-term responsibility, while protecting trust, quality, and scalability.

Extreme Ownership: Extreme Ownership is how we turn priorities into results. Our work is driven by strong ownership, bias for action, and accountability, acting proactively, influencing others, and collaborating to create real impact.

Certta Ambassador: Being a Certta Ambassador means living our culture through action. We are curious to understand the business, take ownership beyond our role, and represent Certta with pride and authenticity. Ambassadorship isn't a role; it's a mindset we live, grow, and move forward together.

5. Responsibilities

It is the responsibility of all Certta Personnel to:

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

The Certta Compliance area is responsible for:

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

Compliance Contact: compliance@certta.ai

Contact Certta Ethics Channel: 0800 800 0158 or
<https://www.contatoseguro.com.br/certta>

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

6. Our Work Environment

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

7. Reputation Protection

We must always consider the reputation of Certta, all Certta 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 Certta's internal and confidential matters.
- (ii) When browsing social media, be careful with posts that may expose Certta 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 Certta, acting in a courteous, attentive and careful manner towards everyone.

8. Confidentiality

Certta Personnel have the obligation to maintain the confidentiality and secrecy of internal Certta 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.

Certta has internal guidelines on the classification and appropriate use of information. If you have any questions, please contact our Information Security area through email infosec@certta.ai.

9. Protection and Use of Assets

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

- (i) Use Certta assets (assets, property, equipment, software, hardware, etc.) for professional purposes and guaranteeing the company's interests.
- (ii) Refrain from using Certta 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 Certta'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 Certta Information Security Team.

Certta has internal guidelines on the use of technology resources. If you have any questions, please contact our Information Security or through email infosec@certta.ai.

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 Certta Personnel and the interests of the Certta must be avoided.

Furthermore, the offering and/or receipt of undue advantages (regardless of the type or amount involved) by any Certta 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 Certta 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.

10.1. Receiving/Offering Gifts, Presents and/or Hospitality

Certta 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.

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 Certta 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.

10.2. About Charitable and/or Donation Requests

You must not, as Certta Personnel, (i) make a charitable request on behalf of Certta to charities that have no relationship with the company; (ii) request donations and/or charity

donations to Certta from third parties, without authorization from the competent internal authority and the Compliance department.

10.3. Personal and/or Family Bonds between Certta Personnel

If you have direct and/or indirect relatives who (i) work at Certta, whether or not in the same department as you or not; (ii) work for a company that has a commercial relationship with Certta; 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.

Certta does not allow decisions at Certta 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.

10.4. Conducting External Activities

As Certta 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 Certta.

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 Certta;
- (ii) The use of Certta 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 Certta.

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

11. Legal Compliance

Acting in accordance with applicable legislation, whether national or foreign, is essential for a sustainable governance environment. As such, Certta does not tolerate illegal acts.

It is the obligation of all Certta 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 Certta, without prejudice to the penalties provided for by law.

Certta's Legal department must be immediately contacted in case of doubts about the application of the laws and regulations that guide its activities, through email legal@certta.ai.

11.1. 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.

Furthermore, 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.

11.2. 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 Certta. For this reason, we respect and pay attention to Diversity, Equity and Inclusion.

11.3. Health, Safety and Wellbeing

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

Certta 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 Certta premises, is expressly prohibited.

11.4. 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, Certta has a team that monitors and ensures compliance with the rules applicable to its activities..

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

Legal Contact: legal@certta.ai

Data Protection Officer - Responsible Contact (DPO): dpo@certta.ai

11.5. 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.

Certta Personnel have the responsibility to act in accordance with the aforementioned laws during the development of their professional activities, and in accordance with the Certta 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 Certta 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 Certta or any of its Personnel acting on its behalf, in party political activities, using Certta 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 Certta.

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 Certta Ethics Channel.

11.6. 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 Certta 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 Certta Ethics Channel, any real or potential situation of fraud, money laundering and/or terrorist financing in Certta operations.

11.7. 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 Certta 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. Certta Personnel must always be focused on customer needs, engaged in our value of "Customer Obsession".

11.8. 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 Certta 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.

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

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

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	Date	Description Changes	Produced by
1.0	2022	Initial release	Legal, Privacy & GRC
2.0	October/23	1st review	Legal, Privacy & GRC People Information security Marketing Financial
2.0	01/10/2024	Directors final approval	Legal, Privacy and GRC Directors
3.0	01/29/2026	Standardization with the new CERTTA brand.	Legal, Privacy and GRC Directors

15. Attachments

Annex I - Declaration of Consent

Annex II - Contact List

Annex I - Declaration of Consent

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

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

Date:

Name:

Signature:

Annex II - Contact List

Certta Ethics Channel

- Site: <https://www.contatoseguro.com.br/certta>
- Phone: 0800 800 0158

Certta Compliance Department

- E-mail: compliance@certta.ai

Certta Legal Department

- E-mail: legal@certta.ai

DPO - Data Protection Officer Certta

- E-mail: dpo@certta.ai

Certta Information Security Department

- E-mail: infosec@certta.ai

Certta People Department

- E-mail: people@certta.ai