

SECCURI INC
CODE OF CONDUCT
VERSION 2.0
LAST REVISED ON: JUNE 5, 2024

The Seccuri Code of Conduct is the ways we put Seccuri's values into practice. It's built around the recognition that everything we do in connection with our work at Seccuri will be, and should be, measured against the highest possible standards of ethical business conduct. We set the bar that high for practical as well as aspirational reasons: Our commitment to the highest standards helps us be the great company that we dream and fulfill our purpose. Respect for our customers, for the environment, and for each other are foundational to our success, and are something we need to support every day.

So please do read the Code and Seccuri's values, and follow both in spirit and letter, always bearing in mind that each of us has a personal responsibility to incorporate, and to encourage others at Seccuri to incorporate, the principles of the Code and values into our work. And if you have a question or ever think that one of someone at Seccuri's or the company as a whole may be falling short of our commitment, we want to hear from you.

Who Must Follow Our Code?

We expect all of our employees, Board of Directors, and Advisory Board members to know and follow the Code. Failure to do so can result in disciplinary action, including termination of employment. Moreover, while the Code is specifically written for Seccuri's employees, Board of Directors, and Advisory Board members, we expect members of our extended workforce (vendors and independent contractors) and others who may be temporarily involved in performing work or services for Seccuri to follow the Code in connection with their work. Failure of a member of our extended workforce or service provider to follow the Code can result in termination of their relationship with Seccuri.

What If I Have a Code-Related Question or Concern?

If you have a question or concern, don't just sit there. You can contact your manager, our HR lead or any of the Founders of Seccuri. You can also submit a question or raise a concern of a suspected violation of our Code or any other Seccuri policy through the contact@seccuri.com. If you believe a violation of law has occurred, you can always raise that through a government agency.

If you have a misconduct concern about our co-Founders, our CEO, a direct report to the CEO, you may notify our law firm Cooley LLC. To notify Cooley, LLC., please mail your concern to:

Cooley LLP
3 Embarcadero Center 20th Floor
San Francisco CA. 94111-4004

You may report your concerns to Seccuri's Advisory Group. However, it is encouraged you to provide your name and contact information so that we may contact you directly if necessary.

No Retaliation

Seccuri prohibits retaliation against anyone who reports or participates in an investigation of a possible violation of our Code, policies, or the law. If you believe you are being retaliated against, please contact our Founders, Legal Counsel, or a government agency.

I. Serve Our Customers

Our customers value Seccuri not only because we deliver great products and services, but because we hold ourselves to a higher standard in how we treat customers and operate more generally. Keeping the following principles in mind helps us maintain that high standard:

1. Integrity

Our reputation as a company that our customers can trust is our most valuable asset, and it is up to all of us to make sure that we continually earn that trust. All of our interactions with our customers should increase their trust in us.

2. Quality

In Seccuri, we will constantly seek for quality in everything we do including our product and services to ensure that what we are doing is useful for our customers.

3. Privacy and Security

Always remember that we are asking our customers (talent, companies, and training providers) to trust us with their personal information. Preserving that trust requires that each of us respect and protect the privacy and security of that information. Our security procedures strictly limit access to and use of customers' personal information and require that each of us take measures to protect customer data from unauthorized access. Know your responsibilities under these procedures, and collect, use, and access customer personal information only as authorized by our Security Policies, our Privacy Policy, and applicable data protection laws.

4. Kindness

Part of being useful and honest is being kind: We recognize relevant customers' feedback when we see it, and we do something about it. We take pride in responding with kindness to communications from our customers whether questions, problems, or compliments. If something is broken, we try to solve it.

5. Take Action

Any time you feel our customers and all stakeholders aren't being well-served, let someone in the company know about it. Continually improving what we do concerns us all, and we want to be proud that Seccuri's workers champion our customers and take the initiative to take action when their interests are at stake.

II. Support and Respect Each Other

A. Our principles

Seccuri has a great commitment to prohibiting and effectively responding to harassment, discrimination, misconduct, abusive conduct, and retaliation. To that end, Seccuri adheres to these Guiding Principles:

Care: Seccuri creates an environment with an emphasis on respect for each individual at all levels of the organization, including offering assistance and showing empathy to employees and members of the extended workforce throughout and after a complaint process.

Transparency: Seccuri is open and transparent regarding the frequency with which complaints arise regarding harassment, discrimination, misconduct, abusive conduct, and retaliation, and the Company's approach to investigating and responding to those allegations.

Fairness: Seccuri ensures that individuals are treated respectfully, fairly, and compassionately in all aspects of Seccuri's interactions and applies policies, procedures, and outcomes consistently regardless of who is involved.

Commitment: Seccuri sets a tone at the top of commitment to a respectful, safe, and inclusive working environment for all employees and members of the extended workforce.

Accountability: Seccuri holds all individuals responsible for their actions, and ensures that where appropriate, those individuals hold others accountable too.

B. Our practice

Seccuri's team members are expected to do their best to create a supportive work environment, where everyone has the opportunity to reach their fullest potential, and be free from harassment, intimidation, bias, and unlawful discrimination.

1. Equal Opportunity Employment

Employment here is based solely upon individual merit and qualifications directly related to professional competence. We strictly prohibit unlawful discrimination or harassment based on race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other

characteristics protected by law. We also try to make all reasonable accommodations to meet our obligations under laws protecting the rights of the disabled.

2. Harassment, Discrimination, and Bullying

Seccuri prohibits discrimination, harassment and bullying in any form – verbal, physical, or visual. If you believe you’ve been bullied, harassed, or discriminated against by anyone at Seccuri, or by a Seccuri partner or vendor, we strongly encourage you to immediately report the incident to your manager, HR or both. Similarly, managers who learn of any such incident should immediately report it to our Founding Team. Seccuri leadership will promptly and thoroughly investigate any complaints and take appropriate action.

3. Drugs and Alcohol

Our position on substance abuse is simple: It is incompatible with the health and safety of our employees, and we don’t permit it. Consumption of alcohol is banned at our offices. Illegal drugs in our offices or at sponsored events are strictly prohibited. If anyone has reasonable suspicion to believe that an employee’s use of drugs and/or alcohol may adversely affect the employee’s job performance or the safety of the employee or others in the workplace, they may communicate with HR or the Founding team. Seccuri can request an alcohol and/or drug screening. A reasonable suspicion may be based on objective symptoms such as the employee’s appearance, behavior, or speech.

4. Safe and Healthy Workplace

We are committed to a safe, healthy, and violence-free work environment. Behavior that poses risk to the safety, health, or security of Seccuri’s team members, our extended workforce, or visitors is prohibited. If you become aware of a risk to the safety, health, or security of our workplace, you should report it to Seccuri Founders immediately. If it is life-threatening or an emergency, call your local police, fire, or other emergency responders first. This also accounts for any actions performed in Seccuri’s Virtual environment.

III. Avoid Conflicts of Interest

When you are in a situation in which competing loyalties could cause you to pursue a personal benefit for you, your friends, or your family at the expense of Seccuri or our customers, you may be faced with a conflict of interest. All of us should avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict.

Ask yourself whether something you are doing or evaluating to do could create an incentive for you or appear to others to create an incentive for you, to benefit yourself, your friends or family,

or an associated business at the expense of Seccuri. If the answer is “yes,” the action you’re considering is likely to create a conflict-of-interest situation, and you should avoid it.

In all situations, the rule is the same. If you are considering entering into a business situation that creates a conflict of interest, don’t do it. If you are in a business situation that may create a conflict of interest, or the appearance of a conflict of interest, review the situation with your manager and Founding team. Finally, it’s important to understand that as circumstances change, a situation that previously didn’t present a conflict of interest may present one.

Personal Investments

Avoid making personal investments in companies that are Seccuri competitors or business partners when the investment might cause, or appear to cause, you to act in a way that could harm Seccuri.

Outside Employment, Advisory Roles, Board Seats, and Starting Your Own Business

Avoid accepting employment, advisory positions, or board seats with Seccuri competitors or business partners when your judgment could be, or could appear to be, influenced in a way that could harm Seccuri. Seccuri board and advisory members and employees should also notify the Founding team. Finally, do not start your own business if it will compete with Seccuri.

Business Opportunities Found Through Work

Business opportunities discovered through your work here belong first to Seccuri, except as otherwise agreed to by Seccuri.

Inventions and IP

Developing or helping to develop outside inventions that a) relate to Seccuri’s existing or reasonably anticipated products and services, b) relate to your position at Seccuri, or c) are developed using Seccuri corporate resources may create conflicts of interest and be subject to the provisions of Seccuri’s employment agreements. If you have any questions about potential conflicts or intellectual property ownership involving an outside invention or other intellectual property, consult our Legal Counsel or Founding team.

Personal Relationships at Work

Certain relationships within Seccuri may compromise or be seen to compromise your ability to perform your job responsibilities, may create uncomfortable or conflicted positions, and may raise issues of fairness, favoritism, or harassment. Therefore, be mindful of how your relationships within Seccuri could impact or be perceived by others. Romantic, physical or familial relationships are not permitted between a Seccuri team member and another Seccuri team member or member of the extended workforce where one individual is in a position to exercise authority or supervision over the other. If you are unsure whether your relationship or possible relationship follows this Code of Ethics, please contact the Founding team.

Accepting Gifts, Entertainment, and Other Business Courtesies

Accepting gifts, entertainment, and other business courtesies from a Seccuri competitor or business partner can easily create the appearance of a conflict of interest, especially if the value of the item is significant. Before accepting any gift or courtesy, consult the with the Founding Team or the Legal Counsel.

Use of Seccuri Products and Services

Avoiding potential conflicts of interest also means that you should not use Seccuri products, services, internal tools, or information in a way that improperly benefits you or someone you know or creates the appearance that you have an unfair advantage over customers outside of Seccuri. You should never approve Seccuri services for yourself, your friends, or family members. Similarly, you should not use the tools, information, or access that you have as a Seccuri team member to participate in or to generate a financial benefit for yourself on Seccuri products or services. If you find yourself subject to a conflict of interest regarding the use of Seccuri's products, services, tools, or information, discuss the situation with your manager, Legal Counsel or Founding team.

Reporting

Founding Team will periodically report to the Board of Directors and Advisors all matters involving Seccuri the Code.

IV. Preserve Confidentiality

Certain kinds of company information, if leaked prematurely into the press or to competitors, can hurt our product or service launches, eliminate our competitive advantage and prove costly in other ways. Our responsibilities extend beyond not revealing Confidential Seccuri material. We must also:

- Properly secure, label, and dispose of Confidential Seccuri material.
- Safeguard Confidential information that Seccuri receives from others under non-disclosure agreements.
- Take steps to keep our trade secrets and other confidential intellectual property secret.

1. Confidential Information

Make sure that information is classified and handled in accordance with Seccuri's Security Policy. If a particular project or negotiation may require you to disclose Need to Know or Confidential information to an outside party, disclosure of that information should be on an only as needed basis and only under a non-disclosure agreement. In addition, Seccuri policy may require a prior security assessment of the outside party that is to receive the confidential information. Be sure to conduct the appropriate due diligence and have the appropriate agreement in place before you disclose the information.

Be sure that pictures you and your guests take at Seccuri don't disclose confidential information.

Some of us might have family or other personal relationships with people employed by our competitors or business partners. Don't tell your significant other or family members or friends anything confidential, and don't solicit confidential information from them about their company.

2. Seccuri Partners

It's equally important not to disclose any confidential information from our partners. Don't accept confidential information from other companies without first having all parties sign an appropriate Non-disclosure Agreement approved by our Legal Counsel. Even after the agreement is signed, try to accept only the information needed to accomplish your business objectives.

3. Seccuri data

Be sure to protect all confidential information of Seccuri that you may have access to through collaborations, access to Seccuri offices or networks, or casual interactions. Don't access or use confidential information except when authorized and reasonably necessary for valid business purposes within the scope of your work at Seccuri. Take all reasonable steps to maintain the confidentiality of any such information just as you would for Seccuri confidential information.

Don't disclose any confidential information of Seccuri, including financial, partner, business, technical, or IP information, before obtaining appropriate sign-off from our Legal Counsel.

4. Competitors/Formers Employers

We don't want our competitors' confidential information. We respect them and want to compete with them fairly. The same goes for confidential information belonging to any former employers of Seccuri's team. If an opportunity arises to take advantage of a competitor's or former employer's confidential information, don't do it. Should you happen to come into possession of a competitor's confidential information, contact our Legal Counsel immediately.

5. Outside Communications

Be extremely careful about disclosing confidential proprietary information. Please ensure that your outside communications (including press, online and social media posts) do not disclose confidential proprietary information or represent that you are speaking on behalf of Seccuri unless you're authorized to do so by the company. Finally, check with your manager before accepting any public speaking engagement on behalf of the company.

V. Protect Seccuri's Assets

Our ability to develop a culture that is generous and open with confidential information depends on how well we conserve company resources and protect company assets and information.

1. Intellectual Property

Seccuri's intellectual property rights (our trademarks, logos, copyrights, trade secrets, "know-how", and patents) are among our most valuable assets. Unauthorized use can lead to their loss or serious loss of value. You must respect all copyright and other intellectual property laws, including laws governing the fair use of copyrights, trademarks, and brands. You must never use Seccuri's logos, marks, or other protected information or property for any business or commercial purpose without pre-clearance from the Founding Team. We strongly encourage you to report any suspected misuse of trademarks, logos, or other Seccuri intellectual property to our Legal Counsel.

Respect the intellectual property rights of others. Inappropriate use of others' intellectual property may expose Seccuri and you to criminal and civil fines and penalties. Please seek advice from our Legal Counsel before you solicit, accept, or use proprietary information from individuals outside the company or let them use or have access to Seccuri proprietary information.

Seccuri allows the use of open-source software. We strictly comply with the license requirements under which open-source software is distributed. Failing to do so may lead to legal claims against Seccuri, as well as significant damage to the company's reputation and its standing with the open-source community. Please seek guidance from our Legal Counsel and our CTO before incorporating open-source code into any Seccuri product, service, or internal project.

2. Company Equipment

Seccuri gives us the tools and equipment we need to do our jobs effectively and counts on us to be responsible and not wasteful with the Seccuri things we are given. The company funds, equipment, and other physical assets are not to be requisitioned for purely personal use. If you are not sure if a certain use of company assets is ok, ask your manager or the Founding Team.

3. The Network

Seccuri's network, the hardware that uses it, computers and mobile devices are critical assets of our company's property, both physical and intellectual. Be sure to follow all security policies. If you have any reason to believe that our network security has been violated, please promptly report the incident to the Founding Team and our CTO.

4. Physical Security

Always secure your laptop, important equipment, and your personal belongings, even while on Seccuri's premises. Don't tamper with or disable security and safety devices. If you see any other suspicious activity, please report it to Seccuri Security.

Use of Seccuri's Equipment and Facilities

Anything you do using Seccuri's assets (e.g., our computers, mobile devices, network, etc.) or store on our premises (e.g., letters, memos, and other documents) might be disclosed to people inside and outside the company. Seccuri may be required by law in response to a subpoena or warrant to monitor, access, and disclose the contents of corporate email, voicemail, computer files, and other materials on our electronic facilities or on our premises. In addition, the company may need to monitor, access, and disclose employee communications and other information on our corporate assets where there is a business need to do so, such as protecting employees and customers, maintaining the security of resources and property, or investigating suspected employee misconduct.

5. Employee Data

We collect and store personal information from employees around the world. Access this data only in line with local law and Seccuri internal policies and be sure to handle employee data in a manner that is consistent with Seccuri's policies.

VI. Ensure Financial Integrity and Responsibility

Financial integrity and fiscal responsibility are core aspects of corporate professionalism. The money we spend on behalf of Seccuri is the company's and, ultimately, our shareholders'. Each person at Seccuri has a role in making sure that money is appropriately spent, our financial records are complete and accurate, and internal controls are honored. This matters every time we hire a new vendor, expense something to Seccuri, sign a new business contract, or enter any deals on Seccuri's behalf.

Seccuri maintains a system of internal controls to reinforce our compliance with legal, accounting, tax, and other regulatory requirements where we operate, and we need to stay in full compliance.

Don't hesitate to contact our Founders or Finance if you have any questions. Some core concepts that lie at the foundation of financial integrity and fiscal responsibility are

1. Spending Seccuri's Money

We spend money wisely. When you submit an expense for reimbursement or spend money on Seccuri's behalf, make sure that the cost is reasonable, directly related to company business, and supported by appropriate documentation. Managers are responsible for all money spent and expenses incurred by their direct reports and should carefully review such spend and expenses before approving.

Signing a Contract

Each time you enter a business transaction on Seccuri's behalf, there should be documentation recording that agreement, approved by our Legal Counsel and Founding Team. Only our Founders can sign contracts today.

All contracts at Seccuri should be in writing and should contain all the relevant terms to which the parties are agreeing. Seccuri does not permit side agreements, oral or written.

2. Reporting Financial or Accounting Irregularities

You should never, ever interfere in any way with the auditing of Seccuri's financial records. Similarly, you should never falsify any record or account, including time reports, expense accounts, and any other Seccuri records.

If you suspect or observe any of the conduct mentioned above or, for that matter, any irregularities relating to financial integrity or fiscal responsibility, no matter how small, immediately report them to Founding Team.

3. Hiring Suppliers

We should always strive for the best possible deal for Seccuri. Seccuri requires that you solicit competing bids to make sure that you're getting the best offer in terms of pricing, quality, service, reliability, terms and conditions of the proposed deal. Please do not hesitate to contact the Founding Team if you have any questions regarding procurement.

4. Retaining Records

It's important that we keep records for an appropriate length of time. Legal requirements, accounting rules, and other external sources sometimes specify longer retention periods for certain types of records, and those control where applicable. In addition, if asked by our Legal Counsel to retain records relevant to a litigation, audit, or investigation, do so until they tell you retention is no longer necessary. If you have any questions regarding the correct length of time to retain a record, contact our Legal Counsel.

VII. Obey the Law

Seccuri takes its responsibilities to comply with laws and regulations very seriously and each of us is expected to comply with applicable legal requirements and prohibitions.

While it's impossible for anyone to know all aspects of every applicable law, you should understand the major laws and regulations that apply to your work. Take advantage of our Legal Counsel and Founding Team to assist you here.

A few specific laws are easy to violate unintentionally:

1. Trade Controls

U.S. and international trade laws control where Securi can send or receive its products and/or services. These laws apply to:

- Imports and exports from or into the U.S.
- Imports and exports of products from or into other countries, with additional concerns when those products contain components or technology of U.S. origin
- Exports of services or providing services to non-U.S. persons
- Exports of technical data, especially when the technical data is of U.S. origin

What constitutes an “import” or “export” under the law is broad. For example:

- Exposing or allowing access by non-U.S. persons to U.S. technical data can be an “export”, regardless of what country the exposure occurred in
- Sending a server from one country (“country X”) into another country (“country Y”) is an export from country X and an import into country Y
- Permitting the download of software from one country (“country X”) into another country (“country Y”) is an export from country X
- Transporting technical data or software on your laptop, or tools or equipment in your luggage, may be an export and import

The bottom line: If you are in any way involved in sending or making available Securi products, services, software, equipment, or any form of technical data from one country to another, work with our Legal Counsel to be sure that the transaction stays well within the bounds of applicable laws.

2. Competition Laws

Most countries have laws known as “antitrust,” “competition,” or “unfair competition” laws designed to promote free and fair competition. These laws prohibit 1) arrangements with competitors that restrain trade in some way, 2) abuse of intellectual property rights, and 3) use of market power to unfairly disadvantage competitors.

Certain conduct is absolutely prohibited under these laws, and could result in your imprisonment, not to mention severe penalties for Securi.

Examples of prohibited conduct include:

- Agreeing with competitors about prices
- Agreeing with competitors to rig bids or to allocate customers or markets
- Agreeing with competitors to boycott a supplier or customer

Other activities can also be illegal, unfair, or create the appearance of impropriety. Such activities include:

- Sharing competitively sensitive information (e.g., prices, costs, market distribution, etc.) with competitors
- Entering a business arrangement or pursuing a strategy with the sole purpose of harming a competitor
- Using Seccuri's size or strength to gain an unfair competitive advantage

Although the spirit of these laws is straightforward, their application to situations can be quite complex.

Seccuri is committed to competing fair and square, so please contact our Legal Counsel or our Founding Team if you have any questions about the antitrust laws and how they apply to you. Any personnel found to have violated this will, subject to local laws, be disciplined, up to and including termination of employment. If you suspect that anyone at the company is violating the competition laws, notify Founding Team immediately.

3. Insider Trading Laws

We share information internally, including non-public information, about Seccuri's business operation. You may also get access unintentionally to confidential information. To use this nonpublic information to buy or sell stock, or to pass it along to others so that they may do so, could constitute insider trading. Insider trading not only violates this Code, but it also violates the law. Don't do it.

4. Anti-bribery Laws

Like all businesses, Seccuri is subject to lots of laws, both U.S. and non-U.S., that prohibit bribery in virtually every kind of commercial setting. Our rule is: Don't bribe anybody, anytime, for any reason.

5. Non-government relationships

You should be careful when you give gifts and pay for meals, entertainment, or other business courtesies on behalf of Seccuri. We want to avoid the possibility that the gift, entertainment, or other business courtesy could be perceived as a bribe, so it's always best to provide such business courtesies infrequently and, when we do, to keep their value moderate.

6. Dealing with government officials

Offering gifts, entertainment, or other business courtesies that could be perceived as bribes becomes especially problematic if you're dealing with a government official. "Government officials" include any government employee; candidate for

public office; or employee of government-owned or -controlled companies, public international organizations, or political parties. Several laws around the world, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, specifically prohibit offering or giving anything of value to government officials to influence official action or to secure an improper advantage. This not only includes traditional gifts, but also things like meals, travel, political or charitable contributions, and job offers for government officials' relatives. Never give gifts to thank government officials for doing their jobs.

The U.S. also has strict rules that severely limit the ability of a company or its employees to give gifts and business courtesies to a U.S. government official and limit the official's ability to accept such gifts.

The Honest Leadership and Open Government Act prohibits giving any gifts, including travel and other courtesies, to Members, Officers, and employees of the U.S. Senate and House of Representatives unless they fit within one of several specific exceptions. Gifts to employees of the U.S. executive branch are also regulated and subject to limits. Finally, state, and local government officials in the U.S. are also subject to additional legal restrictions. Seccuri does not give such gifts or business to any U.S. or other government official.

VIII. Conclusion

Seccuri wants to be a different kind of company. It's impossible to spell out every possible ethical scenario we might face. Instead, we rely on one another's good judgment to uphold a high standard of integrity for ourselves and our company. We expect all Seccuri's team members to be guided by both the text and the spirit of this Code. Sometimes, identifying the right thing to do isn't easy. If you aren't sure, don't be afraid to ask questions of our Legal Counsel or Founding Team.

If you see something that you think isn't right, please immediately let us know.

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