




Code of Ethics and Corporate Behavior

| We are committed to doing the right thing,
in the right way and for the right reasons.

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Message from
André Ferraz,
CEO & Founder, Incognia



Message from André Ferraz, CEO & Founder, Incognia

Hi Team,

In 2010, my partners and I had the idea of creating a geolocation technology that would enable a new type of identity for the age of ubiquitous computing, that put privacy-first. I believe this is a large endeavor and will impact the journey of millions of people. We have a unique opportunity to create something new, and important, and along with that comes great responsibility.

We have always known how powerful this technology is, and because of that, we've always acted responsibly. Ethics guides all our decisions, including our most strategic and our many day-to-day decisions.

Our Code of Ethics and Corporate Behavior will be our guide in relationships with co-workers, customers, suppliers, investors, and other stakeholders.

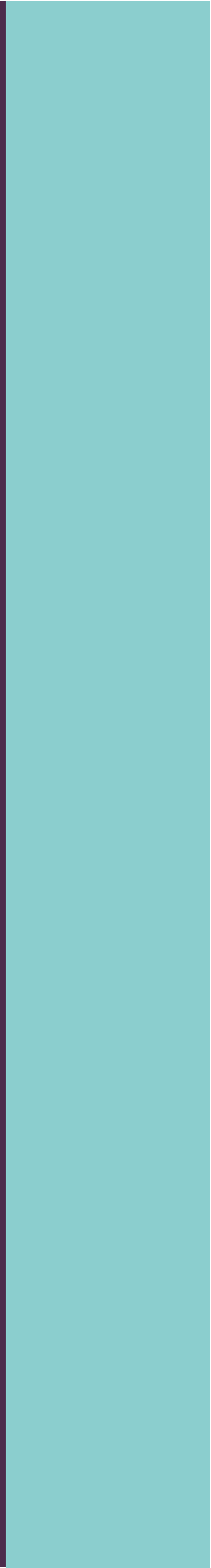
Please review our Code and do not hesitate to bring any thoughts, questions or suggestions. We live in an environment of innovation, full of changes, but nothing will change our commitment to ethics and integrity.

André de Souza Ferraz

Chief Executive Officer & Founder, Incognia



Culture and Values



02 Culture and Values

The most important thing to say about Incognia is that we have a long term vision for our business and we will strive to achieve it. Our culture is made to provide a foundation for high-performance, which will allow us to achieve our vision faster. We are building the next chapter of computing history: a world in which technology invisibly serves us and, to do so, we are constantly raising the bar on our achievements. Our team solves complex problems and is always challenging of each other.

Our Vision

A world where technology invisibly serves us

Basically, this means: a world in which computers disappear.

“The most profound technologies are those that disappear. They weave themselves into the fabric of everyday life until they are indistinguishable from it.”

Mark Weiser

Our Mission

Create a ubiquitous private identity that enables a personalized and frictionless experience with technology

Our Values

Our values are the foundation of our culture

01

We respect and put user privacy first

- We respect user privacy throughout our work
- We don't want to know who our user is
- We believe that people should not give up their privacy for convenience

Living the value:

We do not collect any information that directly identifies an individual. We believe that the commitment to respect privacy increases brand value for us and our customers: we do business with those who believe in our values and vision.

02

We are all responsible for the business

- We are transparent and share business information openly, so we can all work in sync
- We live confidentiality
- We encourage independent decision-making
- We question what we think is wrong
- We are autonomous and proactive
- We are driven by results, not processes

Living the value:

Everyone is responsible for sharing relevant information and asking questions - if we do not ask questions we will not find answers. We strongly believe that we can work with responsibility and that is why we offer freedom to all employees. Everyone is empowered to build things that will take the company forward and the best way to do so is to bring fact-based opinions to discussion. Here, we encourage vigorous discussions.

Confidentiality, for us, is a commitment that we make to everyone. We share with employees all updates on our strategy with the belief, trust and certainty that we will all keep it safe. We protect the information of our users and of our customers when we understand their business.

03

We are fast problem solvers

- We use our time wisely
- We are good at analyzing scenarios, deciding fast and moving forward
- We are able to adapt quickly to the most difficult situations
- It's okay if things break down, because we can learn and fix things quickly
- We agree and commit ourselves: there is no time to review the decisions.

Living the value:

We are resilient, able to learn from mistakes and adapt quickly to change. We are keen learners and we know how to put our efforts toward proposing solutions and ideas. We are good at deciding and moving on to the next challenge. We view problems as opportunities.

Let's suppose a problem comes up. We try to solve it on our own because we are autonomous. And if we need help, we avoid convening committees or meetings, we go

straight to the person who can help. We are pragmatic and efficient, without making excuses or obstacles on the way to solving a problem. Once settled, we are done: we don't look back. Too many people waste time thinking about decisions that have already been made.

04

We respect each other and are free to be ourselves

- We are comfortable to bring who we really are to the company
- We trust and respect each other
- We discuss ideas: everyone has a voice and perspective

Living the value:

Here we are free to be ourselves and share ideas openly. Everyone is open to conversations and helps each other to understand and work with different points of view. We don't want prejudice in our judgments and algorithms.

05

We work as a team to win together

- We are straightforward, transparent and we are not afraid of asking hard questions
- We want teammates who help us win
- We are not afraid to admit mistakes and ask for help
- We are constantly raising the bar: that's why we need the best performances

Living value:

We work as a team. Being on a team means that we choose to be part of it and we are willing to train hard - we want the best players. We think big and we need highly effective people to win because we are challenging the status quo day by day. As teammates, we are able to think critically and to provide honest and respectful feedback. We sincerely believe that we can learn from each other, so we maintain the "listen more than speak" mentality: if we don't listen, we will miss the opportunity to ask powerful questions.

06

We seek what is best for our future

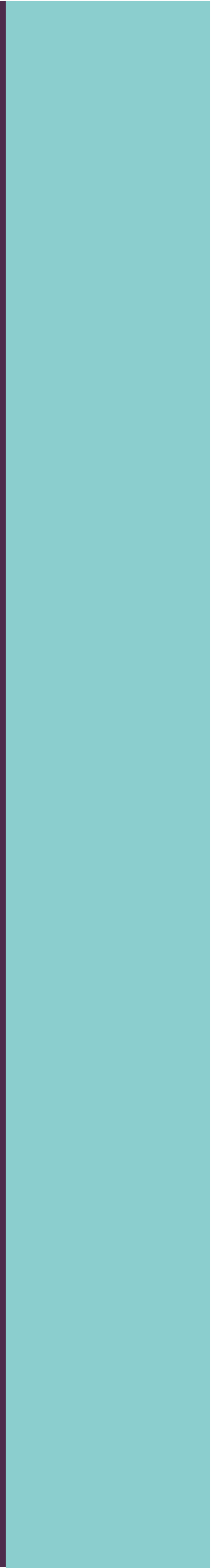
- We care more about the future than the present, we think more globally than locally
- We are open to change and seek the best for the company, even if it is uncomfortable
- We are ambitious and we are not afraid to take risks wisely
- We are optimistic and motivated to do something totally new

Living the value:

Failure does not frighten us - mediocrity does. As employees, we are keen learners and that's why we are always open to change, whether it is better for our vision or whether it's better for our future. Our business is unique, and our vision motivates us to do our best.



Acting with Ethics and Integrity



03 Acting with Ethics and Integrity

A) Why did we create the Code of Ethics and Corporate Behavior?

We at Incognia are committed to ethical conduct in everything we do, and we expect the same commitment from all our employees. This Code is the basis on which we create such a culture and will serve as a guiding star in all relationships, whether with investors, customers, suppliers or with society in general.

B) How to use this Code?

Please be aware that this content has been produced for you, the employee and team member. Thus, first of all, we suggest that you read this Code and familiarize yourself with the concepts that are here. It will be a guide to help you identify and avoid legal and/or ethical problems in areas that may not be familiar. In the end, we want to ensure that our employees make the right

decisions, in the right way, and for the right reasons. All this content is our guiding star and should guide our daily attitudes and actions.

In addition, bear in mind that your manager, the People Team, or the Legal Team are always available to clarify any questions that may arise in connection with this code.

C) Who is responsible for the Code?

We believe that ethics is an obligation for all our employees, regardless of their position. Therefore, this code and the principles included in it are universally applicable. Any report will be evaluated by the Ethics Committee, the body in charge of implementing, disseminating, training, reviewing and updating the Code and communication channels. This group of people is composed of the CEO, CFO, People Director and Legal Director.

D)

May the provisions of this Code change?

Yes, the provisions of this Code may change. We live in a constantly evolving society and new challenging issues are likely to come up, so when that happens, we intend to update the Code, hence it always meets the purpose of serving as a guiding star for decision making.

E)

How and why report violations of this Code?

We want you to have an active role in the construction and consolidation of our culture. Therefore, we encourage you to report any suspected violation of this Code, so it is ensured that the company can act and set things right, whenever we identify a wrongful conduct.

There will be no retaliation for those who in good faith report any conduct that is potentially incompatible with this Code

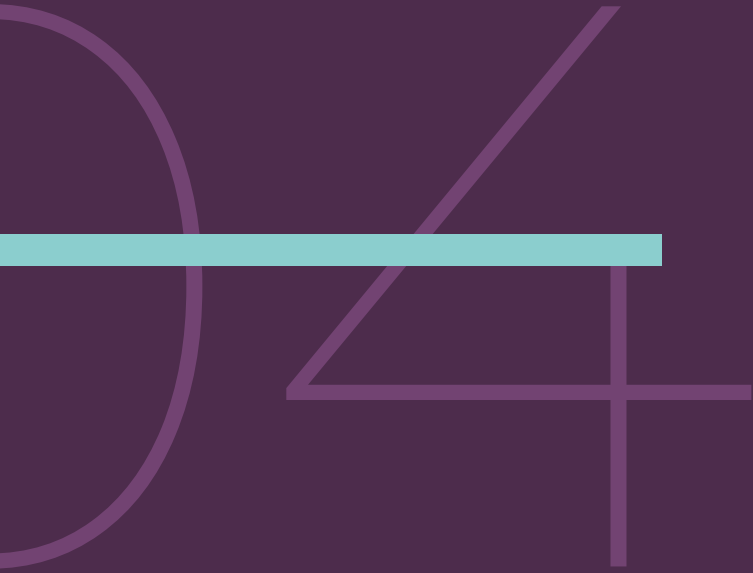
of Ethics. This means that you should not worry if you report something that seemed strange to you and incompatible with what you have read in this Code. Your immediate leader, the People and Legal teams are at your disposal so that you can feel free to report any violation of this Code.

In addition, if you are uncomfortable with any of these channels, you can also use use@SafeSpace which allows you to report anonymously.

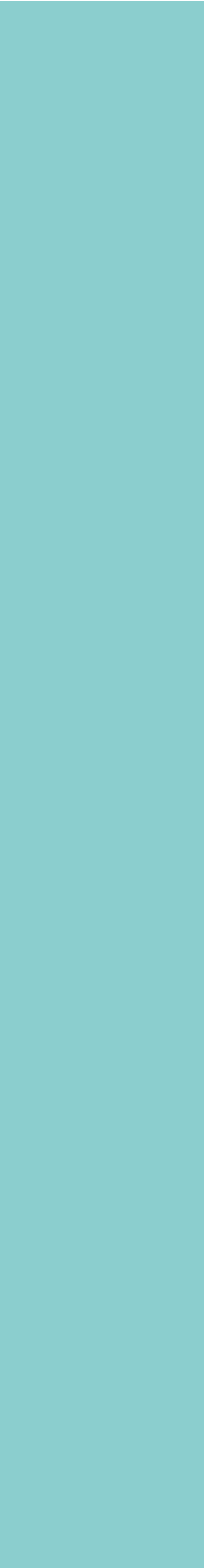
F)

What are the consequences if we do not comply with this Code?

This Code is important to us, ergo your failure to comply will have consequences, including termination of your employment agreement with cause. In addition, certain situations can generate high fines for the company and personal and criminal liability for employees.



Ethics and integrity in the workplace



Ethics and integrity in the workplace

We respect each other and are free to be ourselves. We are confident and sure that if we have the freedom to bring the best of ourselves to the company, everyone wins! People who feel comfortable at work, and teams who trust each other make the work environment much better and healthier.

A) Inclusion and Diversity

The company guides its actions by respecting people, repudiating and combating any type of discrimination based on race, color, age, gender, ethnicity, sexual orientation, gender identity, religion, creed, nationality, disability, or any other discriminatory practice, without exception. The company respects diversity and ensures an inclusive work environment that accepts all differences. You should use our ethics channel if you don't feel comfortable giving feedback or if you're being disrespected.

Some examples:

- In our selection processes we do not favor candidates for reasons other than their achievements. If you notice a situation that suggests otherwise, it is important to report.
- We do not accept differentiated treatment among employees due to their position in the company. Managers, leaders, developers, analysts, interns, and service providers should

be treated equally. In a meeting, for example, everyone has the right to argue and expose their opinions.

- We do not tolerate jokes regarding where the person was born, political opinion, sexual orientation, football team, creed, age.

B) Ethics

We demand our employees to act with honesty and ethics, to be able to build a collaborative, respectful, transparent, and pleasant environment, ensuring fairer working relationships. All employees have a duty to guide their actions by ethical conduct. We do not allow any practice of sexual or moral harassment, committing ourselves to treat with legal severity any and all occurrences in this sense that are brought to our attention.

Some examples:

- Managers cannot use their hierarchy to intimidate or humiliate a subordinate.

- If you become or witness of someone being harassed morally or sexually by a client with whom you have a professional relationship, this fact should also be reported.

C) We pursue what is best for our future

We want everyone to think big, challenge the status quo. We want you to propose new ideas always acting with honesty and integrity, because they are the ones that lead us towards our vision. Ideas that are unfair and dishonest will never be welcomed.

Some examples:

- No matter your position at Incognia, it is very important that you always share your ideas, your perspective.
- Don't be happy with the status quo, always seek improvement in everything you do for the company.
- Accept what is new, despite still showing your opinion based on data and arguments.

D)

We work as a team to win together

We promote an environment of trust and respect among our employees, partners, customers, suppliers and shareholders, where well-being and collective development must overcome individualism and individual interests unrelated to the values and ethical conduct of the company.

Some examples:

- If you do not agree with your co-worker's point of view on a particular subject, you should always express your opinion politely and with supporting arguments so you have a healthy discussion.
- We should not recommend for a job position in the company a candidate because they are our friend or family member, even though we know that he or she does not have a profile that fits the team.
- We value the culture of feedback, and are open to give or receive such a gift from someone.

E)

Responsibility

We are all responsible for the business. Employees should be honest with their work and question whether what they are doing is aligned with the company's values. It's important to admit if you made a mistake and that you need help. Anyone who witnesses inappropriate behavior is encouraged to report it and should not omit it.

Some examples:

- Have you encountered an uncomfortable situation in which you have doubts about whether you are aligned with our values? Stop and think. Reflect on the subject and use the available channels to help you clarify the topic.
- A customer suggested you close a deal that involved sharing user personal identification data. Rethink, it's not the way we act, if you're in doubt, ask for help.

F)

Absence of Politics

We do not tolerate politics. Therefore, our employees should not treat people differently because of their position, nor should they criticize the work of others or prevent them from having a healthy growth in the company, without a genuine motivation or for their own benefit.

Some examples:

- We value feedback culture. We should all give feedback that is built on facts/events and competencies. Not on relationships, guesswork, or camaraderie.
- All opportunities for development and growth should be evaluated equally for all teams taking into account only meritocracy, and not unequal treatment and affinity based decisions.

G)

Meritocracy

We adopt meritocracy as the criteria for any type of hiring, recognition, and reward. The company always seeks excellence, and this is reflected in its employees.

Some examples:

- We guide our internal movements (hiring, promotions, recognitions) by meritocracy. The focus is on the performance and cultural fit of the collaborator. If you notice any situation otherwise, it is very important that you talk to your manager, a member of the Ethics Committee or report directly in our Ethics Channel.

H)

Leadership as a model

Although all employees must act ethically, each leader has an even greater responsibility to lead by example, serving as a role model and inspiration for their teams to adhere to the Code of Ethics, encouraging ethical decisions making, creating a work environment where people feel free to question any misconduct without retaliation against those who speak out.

Some examples:

- All leaders and managers must act according to what is expected by our culture ([more details here](#)), being examples of our values, seeking the growth of the team through high performance and well-being. If you notice any different situation, talk to your manager, BP, any member of the Ethics Committee or report directly in our Ethics Channel.



Ethics and
integrity in the way
they do business

05 Ethics and integrity in the way they do business

A) Avoid Conflict of Interest

The conflict of interest is characterized by the incompatibility between your personal interests with those of the company, capable of compromising or unduly influencing the performance of your responsibilities and attributions.

The use of the company's resources (facilities, materials, equipment, information and others) should be avoided for self and/or third-party benefit, whenever this results in detriment to the company.

Relationships with suppliers and partners should be objectively and impartially oriented, always in benefit of the company and respecting the interests of those involved. Such relationships shall not result in any personal or third-party advantage with whom the employee has personal,

economic or political relationships.

Materials, gifts and/or pecuniary advantages of any kind, regardless of their origin, must be refused. Situations like these usually represent an inappropriate relationship or financial harm to the company.

Exceptions are:

- i. gifts without commercial value, which are part of the customer/partner's communication strategy and/or that are offered to all customers/partners with which they have a business relationship
- ii. invitations to lunches, dinners or events of any kind when it is current business practice of the customer/vendor, provided that it is not a condition or cause for contract closing
- iii. occasional souvenirs reflecting commemorative dates or any other type

of celebration, limited to the amount of \$200.00 (two hundred dollars).

If you believe you are in a Conflict of Interest position, ensure the integrity of your decision. In situations like this, you should report such a case to your immediate manager or to someone who is on the Ethics Committee for approval and to ensure that the company's interests are being observed, while preventing you from committing any Code violation.

B) Good competition practices

We win business by the strength of our technology and the efficiency of our teams. This is what sets us apart. It means that you must not pay, offer, authorize and/or promise (directly or indirectly) any amount, assets of undue value or advantage to any

person, including a client (public or private), to attempt in any way to have a favorable treatment in a negotiation.

Likewise, we don't arrange prices with competitors, divide regions of activity, change bid results, or use questionable information to gain competitive advantages. Remember that improper advantage does not only mean money, but it also includes gifts, travel, lunches, entertainment, donations and sponsorships that are important to the Client.

Also take care with the way you communicate, it is essential that the content of your communications does not generate the false perception that we do not somehow follow good competition practices.



Ethics and integrity
in the relationship
with society



06 Ethics and integrity in the relationship with society

A) Prevention of Money Laundering

We are also in the ecosystem of financial transaction controls. Thus, we always need to look at transactions made with partners, especially to ensure that they do not have the purpose of hiding or concealing value. Thus, we must always attest to the integrity of the partner and what has been purchased. We act as owners, so be aware of situations that could potentially involve money laundering. This includes requests for cash payments, or any unusual payment mean.

B) Respect for human rights

We respect human rights and we only relate to partners, customers and suppliers who also promote human rights in their operations. The work conditions in the company are inspired in the principles contained in the United Nations Universal Declaration of Human Rights, Fundamental Principles and Rights at Work of the International Labor Organization, offering fair salary, benefits and conditions of work, in accordance with the laws, respecting the right of freedom of association, absence of slave labor and a place free of discrimination and harassment.

Some examples:

- We do not do business with companies that fail to comply with human rights principles.

C) Labor, tax and social security responsibility

We are committed to faithfully comply with labor, social security, civil and tax laws, as well as the rules related to occupational safety and medicine, in relation to professionals, respective collaborators and subcontractors.

D) Interviews, Press and External Communications

We value the transparency of our communications, we want to transmit the right information, at the right time and in the right format. Thus, any public statement or pronouncement on behalf of the company must be coordinated and authorized by the marketing department or an officer.

Some examples:

- You have been invited to talk about your work at an event, report to the marketing department and pre-align the speech.

E)**Political Positioning**

By choice, we choose not to support, directly or indirectly, any political party in the countries in which we operate. Thus, it is forbidden to use the company's resources in benefit of any political party activity.

Some examples:

- Do not accept business that has the end of any political purpose.
- If you have any questions about how to deny a business under those terms, talk to the board.

F)**Social Media**

We are all proud of what we have built here, and we want to empower you to get the best out of the media. We know that you will use social media for personal topics and topics related to the work developed by each of you, we just suggest that you take some care and remember: be transparent, you are an ambassador of our brand, our customers and contracts are confidential.

Some examples:

- Never share information that has been shared with you only internally in our meetings (e.g. updates).
- Do not expose the financial situation of the company and contracts that are under negotiation and/or are confidential.
- If you have questions about being able to share a particular subject, talk to your manager, a member of the Legal or marketing team.



Ethics and Integrity
with the company's
assets and information

07 Ethics and Integrity with the company's assets and information

A) Confidential and Privileged Information

You will eventually have access to confidential and/or proprietary information by virtue of your position or function. In this way, you must maintain absolute confidentiality about any information or data that may be known by you and/or that the company provided you for use in your positions/functions.

We must all ensure that confidential information is not transferred, disclosed and/or used, without prior authorization from the company, to and by any third party.

When it is necessary to disclose confidential information to a third-party for the purposes of the company's activities, request the signing of the Non-Disclosure Agreement by the third-party or ensure that the third

party involved has already signed a contract with confidentiality clause with us.

Remember that even within our company, we must only share confidential information with people under a need-to-know basis. Also, always think about all the precautions you can take to avoid undue sharing of confidential information.

It is very important that you are aware of our Information Security Policy. Whenever you are in doubt about this matter, talk to a member of the Security Committee or the Legal team.

B) Intellectual property

One of the key factors of our business is our intellectual property (IP). Therefore, we need to protect it at all times. Intellectual Property includes trademarks, designs,

logos, codes, computer programming, domains, software, patents, and business secrets. Protecting intellectual property means not allowing anyone to misuse our IP in other words, without proper authorization.

Intellectual property also includes what you've developed. Whereas you are a company worker or services provider, everything you develop will be protected as the company's intellectual property and its use will be restricted to the company's activities and interests. This means that improperly sharing such content with a third-party is a violation of our company's intellectual property.

C) Privacy

We respect and put user's privacy first. We do business with those who believe in our values and vision. We believe privacy is an inalienable right of all citizens. All the company's products and services aim to guarantee the right to privacy, so business decisions cannot be made in disregard of people's privacy.

In addition, in your day-to-day work you may come across personal information of employees, customers, investors, etc. Personal information is the type of information that enables us to identify a person through it. Therefore, only access, collect or use information that is strictly necessary for your work. Once you no longer need to use such data, dispose of it securely. If you have questions about what personal or sensitive data is, please contact the Data Privacy team.

D) Reliability of Incognia's Financial Records and Resources

We all need to make sure our financial records are accurate. You should not falsify, omit, or alter any data or information, or even authorize someone to do something in such manner. Any expense must be done honestly and efficiently. We must also provide transparent, regular and reliable information to our auditors.

Likewise ,the Company and investors are subject to periodic audits, as well an investigation by regulatory bodies, ergo, it is our obligation to ensure that all information given is accurate and complete, and it is essential to cooperate with auditors and investigators, whenever necessary.

Some examples:

- We must choose suppliers through open quotations, and all offers from suppliers must be compared and considered fairly and without favoritism.
- In no way falsify and/or produce documents or numbers to obtain a different result from reality.
- When you make expenses that are required to perform your work, you can request reimbursement of that expense. Previously align any spending with your immediate manager. Use this feature consciously and transparently. You can find details in our Refund and Payments Policy.



Palo Alto, March, 2021.

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