



POLICY · PEOPLE

Code of Business Conduct Policy

Version 1 · Approved by Jacek Janczura · 18 October 2026

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1. Objective

This policy sets out Taufolio's expectations for the behavior of staff members toward colleagues, partners and the organization. Taufolio promotes freedom of expression and open communication. All staff members must follow this code, avoid offending others, avoid serious disputes and disruption, and help maintain a well-organized, respectful and collaborative environment.

The policy also states the consequences of unacceptable behavior.

2. Scope

This policy applies to all Taufolio staff members. Staff members include employees (full-time and part-time) and contractors, regardless of the type of agreement or level of seniority. Staff members must follow this policy in all matters relating to their work for Taufolio.

3. Policy statement

Taufolio is committed to creating and maintaining a professional and respectful working environment. This policy describes the behavior expected of all staff members and stresses the importance of diversity and inclusion.

4. Guidelines

4.1 Conduct toward others

- Be welcoming, friendly and patient.
- Be considerate. Others will use your work and you will depend on theirs. Decisions affect users and colleagues, and those consequences must be taken into account.
- Be respectful. Disagreement is no excuse for poor behavior. Frustration must never become a personal attack. An environment in which people feel uncomfortable or threatened is not productive.
- Be careful with your words. Sexist, racist and other exclusionary jokes can offend those around you. Do not insult or put down others. Behave professionally.

Unacceptable behavior includes, but is not limited to:

- violent threats or language directed against another person;
- discriminatory jokes and language;
- posting sexually explicit or violent material;
- posting, or threatening to post, other people's personally identifiable information ("doxing");
- personal insults, especially those using racist or sexist terms;
- unwelcome sexual attention;

- advocating or encouraging any of the above;
- repeated harassment. If someone asks you to stop, stop.

4.2 Disagreement

When there is a disagreement, effort must be made to understand why. Social and technical disagreements happen constantly and must be resolved constructively. People have different perspectives, and not understanding a viewpoint does not make it wrong. Everyone makes mistakes. Blaming does not help; offer help to resolve issues and learn from mistakes.

4.3 Impartiality, gifts and conflicts of interest

- Staff members must treat all people and organizations they meet or do business with impartially.
- Unsolicited gifts or entertainment may be accepted only if they do not go beyond common courtesy and carry no risk of influencing a business decision.
- Staff members must disclose any personal relationships, business transactions and related parties that might cause reputational or financial harm to Taufolio while benefiting the staff member.

4.4 Anti-bribery and anti-corruption

- Staff members must not offer, give, receive or solicit anything of value to influence an official act by a public official, agent or government employee.
- Bribing foreign officials is prohibited, as are unauthorized facilitation payments to those involved in customs, permits, the flow of goods or similar activities.

4.5 Confidentiality and user trust

Staff members must treat user data with care. In particular, they must not attempt to access, copy, disclose or use brokerage credentials or other user secrets, which are encrypted and not readable by staff, and must not use any access they hold for purposes other than their assigned duties. See the Encryption Policy and the Acceptable Usage Policy.

4.6 Confidential and anonymous reporting

Taufolio provides a confidential reporting mechanism that allows staff members, contractors and other stakeholders to report concerns about potential misconduct, policy violations or legal breaches. Reports can be sent to support@taufolio.com with "Integrity report" in the subject. The reporter may choose not to give a name. All reports must be investigated with discretion, and the identity of the reporter must be protected. Retaliation against anyone who raises a concern in good faith is strictly prohibited.

4.7 Disciplinary process

The disciplinary process ensures a fair and consistent approach to any breach of policy, misconduct or failure to meet expectations. Depending on severity, action may include:

- verbal or written warnings;
- reprimand;
- suspension;
- demotion;
- termination for more serious offenses;
- withdrawal of benefits for a definite or indefinite period.

The process involves a thorough investigation, and the person concerned must be given an opportunity to respond to the allegations. The aim is to address issues constructively while maintaining the standards of behavior and performance the business needs, always with fairness and respect for everyone involved.

5. Reporting violations

A person who is a victim of, or notices, unacceptable behavior must notify the Information Security Officer or, for a matter concerning the owner, use the confidential channel in section 4.6 or the competent external authority.

This policy does not allow retaliation against a person for reporting unacceptable behavior or taking part in an investigation. The disciplinary actions listed above also apply to retaliation or intimidation.

6. Document security classification

Public. See the Data Classification Policy for the full set of classification levels.

7. Non-compliance

Compliance with this policy is verified through various methods, including periodic reviews, audits and feedback to the policy owner. Any staff member found to violate this policy may be subject to disciplinary action, up to and including termination of employment or contractual agreement. The disciplinary action depends on the extent, intent and repercussions of the violation.

8. Responsibilities

The Information Security Officer is responsible for approving and reviewing this policy and the related procedures. Staff members are responsible for implementing the relevant sections of the policy in their area of work.

9. Schedule

This document must be reviewed annually and whenever significant changes occur in the organization.

End of Code of Business Conduct Policy. For the version history, see the next page.

10. Version history

Version	Change	Approved by	Date
1 (current)	Taufolio policy issued for the Taufolio service and published in the Taufolio Trust Center	Jacek Janczura, owner	18 October 2026