

# CABIFY BUSINESS CONDUCT GUIDELINES

## A. Basic Behavioral Requirements

### A.1. Behavior which Complies with Law.

Observing the law and the legal system in every country where we do business is a fundamental principle for Cabify. All employees must obey the laws and regulations of the legal systems within which they are operating in addition to applicable Cabify policies.

Violations of the law must be avoided under all circumstances. Regardless of the sanctions that could be imposed by law, all employees guilty of a violation will be subject to disciplinary consequences because of the violation of their employment duties.

### A.2. Mutual Respect, Honesty and Integrity

We respect the personal dignity, privacy, and personal rights of every individual. We work together with individuals of various ethnic backgrounds, cultures, religions, ages, disabilities, races, sexual identity, world view and gender. Consistent with our corporate principles and with the employment laws of numerous countries in which we work, we do not tolerate discrimination against anyone on the basis of any of these characteristics or harassment or offensive behavior, whether sexual or otherwise personal.

These principles apply to both internal cooperation and conduct towards external partners. We make decisions about those we work with – including personnel, suppliers, customers and business partners – based only on appropriate considerations, not on the basis of inappropriate considerations such as discrimination or coercion. We are open, honest and stand by our responsibilities. We are reliable partners and make no promises we cannot keep. And we expect our employees to act with integrity.

### A.3. Responsibility for the Reputation of Cabify

To a substantial degree, the reputation of Cabify is determined by our actions and by the way each and every one of us presents and conducts himself/herself. Illegal or inappropriate behavior on the part of even a single employee can cause the Company considerable damage. Every employee should be concerned with maintaining and promoting the good reputation of Cabify in their respective countries.

### A.4. Management, Responsibility and Supervision

The culture of integrity and compliance in an organization starts at the top. All managers must fulfill their duties of organization and supervision. All managers bear responsibility for all employees entrusted to them. All managers must earn respect by exemplary personal behavior, performance, openness, and social competence. This means, among other things, that each manager must emphasize the importance of ethical conduct and compliance, make them regular topics of everyday business and promote them through personal leadership and training. Each manager must also set clear, ambitious and realistic goals and lead by example.

Managers should permit their employees as much individual responsibility and leeway as possible, while making it clear that compliance is required under all circumstances, at all times. All managers shall also be accessible in case employees wish to raise compliance concerns, ask questions or discuss a professional or personal problem. These responsibilities of managers do not relieve employees of their own responsibilities.

We must all work together to comply with applicable laws and Cabify policies. These specific manager responsibilities are listed here to give employees an idea of the leadership and support they should expect from their superiors.

It is the responsibility of all managers to see to it that there are no violations of laws within their area of responsibility that proper supervision could have prevented. They still remain responsible, even if they delegate particular tasks. In particular, the following duties apply to managers:

1. The manager must carefully select employees based on their personal and professional qualifications and suitability. The duty of due care increases with the significance of the task the employee must perform (duty of selection).
2. The manager must give precise, complete and binding instructions to employees, especially with regard to compliance with the law (duty to give instructions).
3. The manager must ensure that compliance with the law is continuously monitored (duty of monitoring).
4. The manager must clearly communicate to employees the importance of integrity and compliance in everyday business. He/she must also communicate that violations of the law are unacceptable and will have employment consequences (duty of communication).

## B. Treatment of Business Partners and Third Parties.

### B.1. Anti-Corruption: Offering and Granting Advantages

We compete fairly with the quality and the price of our innovative product, not by offering improper benefits to others. As a result, no employee may directly or indirectly offer, promise, grant or authorize the giving of money or anything else of value to a government official to influence official action or obtain an improper advantage. The same applies to a private commercial counterparty in a business transaction in consideration for an improper advantage.

Any offer, promise, grant or gift must comply with applicable laws and Cabify's policies, and must not raise an appearance of bad faith or unsuitableness. This means that no such offer, promise, grant or gift may be made if it could reasonably be understood as an effort to improperly influence a government official or as a bribe to a commercial counterparty to grant Cabify a business advantage.

The term *government official* is defined broadly to include officials or employees of any government or other public body, agency or legal entity, at any level, including officers or employees of state owned enterprises and public international organizations. It also includes candidates for political office, political party officials and employees, as well as political parties. In addition, employees may also not give money or anything of value *indirectly* (for example, to a consultant, agent, intermediary, business partner or other third party) if the circumstances indicate that all or part of may possibly be directly or indirectly passed on to a government official to influence official action or obtain an improper advantage or to a private commercial counterparty in consideration for an unfair advantage in a business transaction. For that reason, employees responsible for hiring consultants, agents, partners in joint ventures or comparable entities must take action as appropriate to:

- ensure that those third parties understand and will abide by Cabify's anti-corruption policies or comparable equivalents,
- evaluate the qualifications and reputation of such third parties, and
- include appropriate provisions in agreements and contracts designed to protect Cabify.

This applies in particular, but not only if they have contact with government officials on behalf of Cabify.

Finally, each investment decision made by the Company – whether it is the purchase of a controlling interest in a company or a minority interest, or a joint venture arrangement – must be based on a prior compliance check.

### B.2. Anti-Corruption: Demanding and Accepting Advantages

Employees are not permitted to use their jobs to solicit, to demand, accept, obtain or be promised advantages. This does not apply to the acceptance of occasional gifts of purely symbolic value or meals or entertainment reasonable in value that are consistent with local customs and practices and Cabify's policies. Any other gifts, meals or entertainment must be refused.

### B.3. Political Contributions, Charitable Donations and Sponsoring

Cabify does not make political contributions (donations to politicians, political parties or political organizations). As a responsible member of society, Cabify makes monetary or product donations for education and science, art and culture, and social and humanitarian projects. Sponsorships for which Cabify receives advertising are not considered donations, nor are contributions to industry associations or fees for

memberships in organizations that serve business interests. Some donations are always prohibited, including donations

1. to individuals and for-profit organizations,
2. paid to private accounts,
3. to organizations whose goals are incompatible with Cabify's corporate principles, or
4. that would damage Cabify's reputation. All donations must be transparent.

This means, among other things, that the recipient's identity and planned use of the donation must be clear and the reason and purpose for the donation must be justifiable and documented. Quasi-donations, meaning donations which appear to be compensation for a service but are substantially larger than the value of the service, are also prohibited.

Sponsoring means any contribution in money or in kind by Cabify towards an event organized by a third party in return for the opportunity to advertise the Cabify brand by, for example, displaying the Cabify logo, being mentioned in the opening or closing addresses, or the participation of a speaker on a discussion panel, as well as tickets to the event. All sponsoring contributions must be transparent, pursuant to written agreement, for legitimate business purposes, and commensurate with the consideration offered by the event host. Contributions may not be promised, offered or made to secure unjustified competitive advantages for Cabify or for other improper purposes, and they may not be made towards events organized by individuals or organizations that have goals incompatible with Cabify's corporate principles or that would damage Cabify's reputation.

## **B.4. Government Procurement**

Cabify competes for contracts from government entities and government owned businesses around the world. In all of Cabify's dealings and interactions with governments, we act in a manner that is transparent, honest and accurate. We comply with all applicable laws and regulations related to government procurements, including laws prohibiting efforts to improperly influence government officials.

## **B.5. Working with Suppliers**

Cabify as a company expects its suppliers to share Cabify's values and comply with all applicable laws. Furthermore, Cabify expects its suppliers to act in accordance with the following principles, similarly adopted by Cabify, concerning responsibilities vis-à-vis stakeholders and the environment:

- comply with all applicable laws,
- prohibit corruption,
- respect basic human rights of employees,
- comply with laws prohibiting child labor,
- take responsibility for the health and safety of their employees.

## **Demanding and accepting advantages**

- Employees are not allowed to use their job to solicit, demand, accept or obtain any advantages.
- Employees may not offer to (or accept from) third parties any gifts, hospitality, rewards, benefits or other incentives that could (i) impact on their professional impartiality, (ii) influence a business decision or (iii) lead to the improper performance of an official duty. Similarly, they may not offer or accept cash donations.
- Employees may offer and accept 'reasonable' and 'proportionate' gifts and entertainment. In determining what is 'reasonable' and 'proportionate', employees should consider (i) the value of the gift or benefit, as well as (ii) the frequency with which the same or similar gift or benefit is offered:
  - Gifts, hospitality, rewards, benefits or other incentives with a value of more than USD100 (or equivalent), either offered or received, must seek prior approval from the office/function heads and will not be considered as 'reasonable' and 'proportionate'.
  - Once the gifts, hospitality, rewards, benefits or incentives received by an employee have been approved by the relevant office/function head, the latter should consider must hold a raffle of the gifts, hospitality, rewards, benefits or other incentives received between the employees of that office.

## **Ownership of vehicles**

- It is forbidden for Cabify employees to own any cars that (i) are registered in the Application and (ii) provide service to Cabify. Employees cannot act as drivers for Cabify either.
- If employees have a relative or acquaintance(s) who owns or drives any vehicles providing service to Cabify, they must immediately inform the relevant local Human Resources team. The latter will provide the Global Human Resources team: (i) the name of the relative or acquaintance that happens to own or drive of the car, (ii) the identification of the vehicle and (iii) the relationship between the owner/driver and the relevant employee. This report will be shared with the relevant people within the Risk & Fraud Team for information and prevention purposes.
- Any interaction in Cabify systems, app, or any manual assignment in order to favour journeys or any special condition or assignment to said vehicles by the employee (or by any other employee by order of the latter) will be considered an Internal Fraud attempt, and it will be sanctioned with the immediate dismissal of the employees involved. These assignments include both journeys and reservations or any other action that may involve or be considered favoritism to any driver, and will be sanctioned equally with immediate dismissal.
- Any suspicion of any of the above described actions must be immediately reported to the Risk & Fraud team to be reviewed and investigated further. The results of this investigation must be shared with HR and the Head of the concerned Dpt, to take the necessary disciplinary actions.
- Please note that the commission of any other action that could be considered as internal fraud will lead to immediate dismissal of the employee who commits it too. The following actions, among other, will be deemed to be internal fraud:
  - Assignment of vouchers or use of the latter for the employee's own benefit.
  - Request for 'ghost' journeys.
  - "Help" Drivers to get more journeys
  - "Help" Users to get more offers and/or discounts
  - Any type of collusion or non-declared relation with Drivers
  - Disclosing sensitive or confidential information to third parties outside of the Company