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Fraudfinder Ltd - Corporate Code of Conduct

Version: 1.0

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Approved by: CEO

Review Cycle: Annual

1. Purpose and Scope

This Code of Conduct sets out the standards of behaviour expected of every director, employee, contractor, and consultant of Fraudfinder Ltd (“Fraudfinder”, “we”, “our”). It defines how we work, how we treat one another, and how we engage with customers, suppliers, regulators, and the wider community.

Fraudfinder operates in the financial crime and fraud prevention sector. Our customers, predominantly regulated lenders and online gaming operators, rely on us to handle sensitive personal and financial data with integrity. Upholding this Code is therefore not optional; it is fundamental to our licence to operate.

This Code applies globally, in every jurisdiction in which we operate, and at all times when representing the company.

2. Our Values

We commit to four operating principles which underpin every section of this Code:

- Integrity. We do the right thing, particularly when it is difficult or unobserved.
- Accountability. We own our decisions, our mistakes, and our remediation.
- Respect. We treat colleagues, customers, and counterparties with dignity.
- Excellence. We deliver work we are proud to put our name to.

3. Environment, Social and Governance (ESG)

We recognise our responsibility to operate sustainably and to contribute positively to the communities in which we work.

Environment. We minimise our environmental footprint by operating a remote-first / low-carbon office model, selecting cloud providers with credible decarbonisation commitments, and reducing unnecessary travel. We monitor energy consumption of our cloud workloads and prefer providers powered by renewable energy.

Social. We support the communities in which we live and work, give employees reasonable time to volunteer, and source services from suppliers that share our values on labour standards and human rights. We will not knowingly engage with suppliers linked to modern slavery, child labour, or human trafficking.

Governance. Our board exercises proper oversight of strategy, risk, and compliance. We maintain accurate books and records, prepare financial statements in accordance with applicable accounting standards, and submit to independent audit where required.

4. Inclusion, Diversity and Equal Opportunities

Fraudfinder is an equal opportunity employer. We recruit, develop, promote, and reward people on the basis of merit and the requirements of the role, irrespective of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation (the protected characteristics under the UK Equality Act 2010).

We actively work to remove bias from our hiring, performance, and promotion processes, and we expect every colleague to contribute to a workplace in which difference is valued and underrepresented voices are heard.

Discrimination, victimisation, or harassment of any kind will not be tolerated and will result in disciplinary action up to and including dismissal.

5. Dignity at Work

Every colleague has the right to work in an environment free from bullying, harassment, intimidation, and abuse. This applies to in-person and remote settings, and to interactions with customers, suppliers, and other third parties.

Bullying and harassment may be physical, verbal, or written, and includes conduct delivered via email, chat platforms, video calls, or social media. Unwanted conduct related to a protected characteristic, or conduct that creates an intimidating, hostile, degrading, humiliating, or offensive environment, is prohibited.

Concerns can be raised informally with a manager or formally via the procedure described in section 10 (Whistleblowing). Retaliation against anyone who raises a good-faith concern is itself a serious breach of this Code.

6. Wellbeing of Employees

We recognise that sustained performance depends on the mental, physical, and financial wellbeing of our people. We commit to:

- Reasonable working hours and respect for time away from work.
- Open conversations about workload, mental health, and personal circumstances.
- Access to confidential employee assistance and signposting to professional support.
- Flexible working arrangements where the role permits, including remote and hybrid working.
- Reasonable adjustments for colleagues with disabilities or long-term health conditions.

Managers are expected to model healthy working practices and to act early on signs of stress, burnout, or distress within their teams.

7. Health and Safety

We comply with the Health and Safety at Work etc. Act 1974 and all related regulations. We are responsible for the health, safety, and welfare of our employees, contractors, visitors, and anyone else affected by our activities.

Specifically, we will:

- Maintain safe premises, equipment, and IT environments, including ergonomic guidance for home and office workers.
- Provide appropriate training and supervision, including for new starters and remote workers.
- Carry out and document risk assessments, including display screen equipment (DSE) and home-working assessments.
- Investigate accidents, near misses, and dangerous occurrences, and report under RIDDOR where required.

Every colleague is responsible for taking reasonable care of their own safety and that of others, following safety procedures, and reporting hazards promptly.

8. Gifts and Hospitality

Fraudfinder operates in a regulated environment and complies with the UK Bribery Act 2010. We do not offer, give, request, or accept any gift or hospitality that is intended, or could reasonably be perceived, to influence a business decision.

The following principles apply:

- Gifts and hospitality must be modest, infrequent, proportionate, and offered in the ordinary course of business.
- Cash, cash equivalents (including gift cards), and personal favours are prohibited.
- Anything with a value above £100 per item, or repeated gifts/hospitality from or to the same counterparty, must be disclosed to and approved in advance by the CEO or, where the CEO is involved, by the Board.
- Gifts and hospitality offered to or by public officials require prior written approval, regardless of value.
- All approved gifts and hospitality are recorded in the company gifts and hospitality register.

Facilitation payments, kickbacks, and bribes of any kind are strictly prohibited and will result in disciplinary action and, where appropriate, referral to law enforcement.

9. Conflicts of Interest

A conflict of interest arises when a personal interest, relationship, or activity could compromise, or appear to compromise, the objective performance of duties for Fraudfinder. Examples include:

- Holding a financial interest in, or receiving income from, a customer, supplier, or competitor.
- Engaging in outside employment, consultancy, or directorships that overlap with Fraudfinder's business.
- Hiring, managing, or contracting with close personal relations.
- Using company information, systems, or assets for personal benefit.

All actual, potential, or perceived conflicts must be declared in writing to the CEO promptly upon arising. The company will agree a documented mitigation, which may include recusal from decisions, divestment, or other appropriate measures. Conflicts are reviewed at least annually.

10. Whistleblowing

Colleagues are encouraged to raise concerns about suspected wrongdoing, including breaches of this Code, breaches of law, financial impropriety, fraud, bribery, data protection failures, health and safety risks, and any conduct that could damage Fraudfinder's reputation or harm individuals.

Concerns should normally be raised in the first instance with line management. Where this is not appropriate, or where a concern has not been adequately addressed, colleagues may raise the matter directly with the CEO at alexander@fraudfinderai.com or, where the concern relates to the CEO, with the Chair of the Board.

Concerns can be raised anonymously and will be treated in the strictest confidence so far as the law and a thorough investigation allow. Disclosures are protected under the Public Interest Disclosure Act 1998. Retaliation, victimisation, or detrimental treatment of a colleague who raises a concern in good faith is itself a serious disciplinary matter.

11. Confidentiality and Data Protection

We handle personal and financial data on behalf of customers and end users. We comply with the UK GDPR, the Data Protection Act 2018, and our contractual obligations to customers and partners. Confidential information must only be accessed, used, or disclosed where there is a legitimate business reason and where appropriate technical and organisational safeguards are in place.

Breaches, suspected breaches, or near-misses must be reported immediately to the CEO and to the company's data protection lead so that incident response and any required regulatory notifications can be actioned within statutory timeframes.

12. Compliance with Laws and Sanctions

We comply with all laws applicable to our business, including (without limitation) the UK Bribery Act 2010, the Modern Slavery Act 2015, the Proceeds of Crime Act 2002, the Equality Act 2010, the Health and Safety at Work etc. Act 1974, the UK GDPR, the Data Protection Act 2018, and applicable sanctions regimes (UK, EU, US).

We do not enter into business relationships with sanctioned parties or in sanctioned jurisdictions, and we screen counterparties accordingly.

13. Reporting Breaches and Disciplinary Action

Suspected breaches of this Code should be reported via the channels set out in section 10. All reports are taken seriously and investigated proportionately. Substantiated breaches may result in disciplinary action up to and including summary dismissal, recovery of losses, termination of contractor or supplier arrangements, and, where appropriate, referral to regulators or law enforcement.

14. Governance, Review, and Acknowledgement

Owner. The Chief Executive Officer is the policy owner and is accountable for the operation of this Code.

Review. Annually, or sooner if regulation, business circumstances, or stakeholder feedback require it.

Acknowledgement. All directors, employees, and long-term contractors are required to read this Code on joining and to confirm in writing that they have done so. Acknowledgements are repeated on each material update.

Approved by. The Board of Fraudfinder Ltd, May 2026.

Alexander Shartsis, Chief Executive Officer

Fraudfinder Ltd

May 2026