Cape

Connection without compromise.

Code of Conduct
Effective Date: Jun 5, 2026
Next Review Date: Jun 5, 2027
Approval Authority: Board of Directors

1.0 Purpose

The Code of Conduct (“Code”) is built around our belief that everything we do will be measured against the highest possible standards of ethical business conduct. Our commitment to high standards helps us hire great people, build great products, and attract loyal customers.

2.0 Scope

The Board of Directors (“Board”) is responsible for overseeing the effectiveness of the company’s internal control environment. This includes reviewing key policies, assessing risk management practices, and monitoring control frameworks to ensure it supports the security, availability, processing integrity, confidentiality, and privacy of the company's systems and data.

The Board expects all employees, contractors, consultants, and other partners to be familiar with and adhere to the Code. Failure to do so can result in disciplinary action, up to and including termination of your employment or other relationship with Cape.

If you have a question or concern about the Code, be proactive and contact your supervisor, manager, Legal, or Compliance team. You can also submit a question or raise a concern regarding a suspected violation of our Code (or any other Cape policy or procedure) to your supervisor, manager, Legal team, or the Compliance Officer.

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3.0 Policy Statement

You're expected to be honest, act ethically, and demonstrate integrity in all situations. You have a duty to follow policies and procedures found in this Code, as well as those that are specific to your job or position with Cape. You must also comply with all applicable laws governing our business. Most of the time, common sense and good judgment provide excellent guideposts.

3.1 Before You Act, Ask Yourself:

- Is this the right thing to do?
- Is it legal?
- Do I have the authority to act?
- Does the action comply with the Code and Cape's other policies and procedures?
- If this action were to become public, how would it be portrayed in the media?
- Would I be upset or embarrassed if other people learned about this action?

If your answer to any of these questions raises doubts, talk with your supervisor, manager, Legal team, or the Compliance Officer. If you're a supervisor or a manager, you're responsible for knowing the rules and reviewing the Code with the people who report to you to make sure they're familiar with its contents. You're also responsible for preventing violations of the Code, detecting potential violations, and reporting them appropriately.

3.2 You're Expected to:

- Lead with integrity.
- Encourage employees to ask questions and expand their knowledge of the rules.
- Demonstrate integrity by acting promptly and effectively when necessary.
- Educate employees on compliance policies specific to their job responsibilities.

3.3 Quality Work Environment

We are committed to a supportive work environment where our employees have the opportunity to reach their fullest potential. Members of our Cape team are expected to do their utmost to foster a workplace culture free of harassment, intimidation, bias, and unlawful discrimination. Please refer to the Employee Handbook for more detailed information on how we should conduct ourselves at work.

3.4 Equal Opportunity Employment

Employment at Cape is based solely upon individual merit and qualifications directly related to professional competence. We strictly prohibit unlawful discrimination or harassment on the basis of 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 make reasonable accommodations to meet our obligations under laws that protect the rights of individuals with disabilities.

3.5 Harassment, Discrimination, and Bullying

Cape strictly prohibits discrimination, harassment, and bullying in any form – verbal, physical, or visual. If you believe that you've been bullied or harassed by anyone at Cape or anyone connected to Cape (such as a partner or vendor), please immediately report the incident to your supervisor, manager, or the HR team. Anonymous reporting is also available. The HR team will promptly and thoroughly investigate any complaints and take appropriate action. Please consult the process outlined in the Responsible Disclosure Policy and Anti-Harassment, Discrimination, and Bullying Policy for guidance on reporting.

3.6 Drugs and Alcohol

Substance abuse is incompatible with the health and safety of our employees, and we don't permit it. Consumption of alcohol is allowed at our office on special occasions, but we ask everyone to use good judgment and never drink in a way that: (i) leads to impaired performance or inappropriate behavior, (ii) endangers the safety of others, or (iii) violates the law. Illegal drugs in our offices or at work-related events are strictly prohibited.

3.7 Safe Workplace

We are committed to a violence-free work environment. We will not tolerate any level of violence or the threat of violence in the workplace. No one should bring a weapon to work under any circumstances. If you become aware of a violation of this policy, report it to a member of senior management, HR, or the Compliance Officer immediately.

3.8 Avoid Conflicts of Interest

As a member of the Cape team, you should avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict of interest, especially if it would create an incentive for you or present the appearance of an incentive for you (whether directly or indirectly). Generally, conflicts of interest are situations that divide your loyalty between Cape, on the one hand, and your own personal interests, on the other. Here is a list of areas where conflicts of interest often arise:

- Personal investments (e.g., with competitors)
- Outside employment, advisory roles, and board seats
- Business opportunities found through your work at Cape
- Inventions influenced by your work at Cape
- Business opportunities involving friends and relatives
- Acceptance of gifts, entertainment, and other business courtesies

Determining whether a conflict of interest exists can be challenging. Even the appearance of a conflict of interest could create a problem. If you are unsure whether there is a conflict of interest or whether circumstances create the appearance of one, contact the Legal team to discuss.

3.9 Preserve Confidentiality

Throughout its lifecycle, all nonpublic information that is processed, transmitted, and/ or stored by Cape must be protected in a manner that is consistent with our contractual and legal requirements and reasonable and appropriate for the level of sensitivity, value, and risk associated with Nonpublic information (please see Cape's Data Classification Policy for internal designation guidance). Information that contains data elements from multiple designations must be protected at the highest level of confidentiality or security. For example, a document containing Nonpublic and Public information must be treated as Nonpublic information. Non-public information must be secured against disclosure, modification, and unauthorized access. Therefore, the information must be:

- Securely stored at rest;
- Securely transmitted; and
- Securely destroyed in accordance with data retention policies and procedures.

3.10 Information Security and Acceptable Use

You're responsible for using Cape's computer resources properly – especially with regard to information security – and you need to be thoroughly familiar with Cape's Information Security Policy and all policies and procedures therein.

3.11 Preventing Unauthorized Access:

- Never share your login information. See Cape's Acceptable Use Policy for additional requirements.
- Lock your workstation when you step away and log off when you leave for the day. Your lock screen timer will be managed by IT, and under no circumstances should this be modified.
- A password or biometric login should always be required immediately after the lock screen activates. Compliance requirements may require reducing the lock screen timer, and updates will be managed through our Mobile Device Management (MDM) platform.
- Clear your workstation, waste can, printers, and fax machines of sensitive information, such as personally identifiable information (PII) or company-sensitive data. For additional information, refer to the Clean Desk section of the Acceptable Use Policy.

3.12 Protect Cape's Assets

3.12.1 Intellectual Property

Cape's intellectual property rights (e.g., patents, trademarks, copyrights, trade secrets, and "know-how") are valuable assets. Unauthorized use can result in their loss or a significant loss of value. You must comply with all intellectual property laws, including laws governing the fair use of copyrights and trademarks. You must never use Cape's trademarks or other protected information or property for any business or commercial venture without pre-clearance from the Marketing team. Report any suspected misuse of trademarks or other Cape intellectual property to the Compliance or Legal teams.

Likewise, respect others' intellectual property rights. Inappropriate use of others' intellectual property may expose Cape and you to criminal and civil fines and penalties. Seek advice from the Legal team before you solicit, accept, or use proprietary information from individuals outside the Cape or allow them to access Cape proprietary information. You should also check with the Legal team before developing a product feature that uses content not owned by Cape.

3.12.2 Company Equipment

Cape provides us with the tools and equipment we need to do our jobs effectively, but it counts on you to be responsible and not wasteful. If you are uncertain whether personal use of Cape assets is okay, ask your supervisor, manager, or the Compliance team.

3.12.3 The Network

Cape's network, software, and computing hardware are critical components of its physical and intellectual property. Follow all security policies diligently. If you have any reason to believe that our network security has been violated – for example, you lose your laptop or think that your network password may have been compromised – promptly report the incident to your supervisor or manager, IT team, and the Security team.

3.12.4 Physical Security

Bad actors may steal Cape assets. Always secure your laptop, important equipment, and personal belongings, even while on Cape premises. Promptly report any suspicious activity to your supervisor or manager.

3.13 Ensure Financial Integrity and Responsibility

Financial integrity and fiscal responsibility are core aspects of corporate professionalism. Each person at Cape has a role in ensuring that money is spent appropriately, our financial records are complete and accurate, and internal controls are followed. This is applicable every time we hire a new vendor, incur an expense to Cape, or sign a new business contract.

If you contribute in any way to the preparation or verification of Cape's financial statements and other financial information, you must ensure that our books, records, and accounts are accurately maintained. You must also cooperate fully with our finance team, as well as our independent public accountants and counsel.

It is important that we also keep records for an appropriate length of time. Cape's Privacy Policy and Data Retention Policy include minimum record retention periods for certain types of records. These guidelines take into account applicable legal requirements, accounting rules, and other external regulations. Contractual obligations may sometimes specify longer retention periods for certain types of records. In addition, if you are asked by the Legal team to retain records relevant to a litigation, audit, or investigation, do so until the Legal team tells you that retention is no longer necessary. If you have any questions regarding the correct retention period for a record, please contact the Compliance or Legal teams.

3.14 Obey the Law

Cape takes its responsibility to comply with laws very seriously. Every Cape team member is expected to comply with applicable legal requirements and restrictions. You should be familiar with the laws and regulations that govern your work. A few specific areas of legal compliance are discussed in greater detail below:

3.14.1 Insider Trading

Because we firmly believe in transparency and trust throughout the organization, you may find yourself in possession of confidential information. Inside information is any material nonpublic information, positive or negative, about Cape or other organizations with which we work. Remember that we also may possess confidential information about our customers, partners, suppliers, vendors, collaborators, competitors, or other third parties. It is equally important that we treat this information with the same care that we treat our personal information.

We never buy or sell securities based on inside information, nor do we disclose such information to others. It doesn't matter how we learned the information — using material nonpublic information to trade securities is never acceptable. Doing so violates the law and the trust we have built with our fellow employees, customers, partners, suppliers, vendors, collaborators, investors, and others.

3.14.2 Bribery or Corruption

All forms of bribery, kickbacks, and corruption are prohibited. We will not tolerate bribery, payment, or receipt of kickbacks, or any form of corruption, for any purpose. There is no potential benefit that can justify damaging our integrity and reputation or the trust others place in us. All persons subject to this Code must comply fully with the Foreign Corrupt Practices Act (FCPA) and other applicable laws prohibiting bribery, kickbacks, and other forms of corruption. Many of these laws are very broad and apply to government and private-sector bribery, kickbacks, and corruption. You are responsible for understanding the applicable laws and our Anti-Corruption Policy. If you have a question regarding any gift, entertainment, or other expense, consult our Financial Officer and Compliance Officer before you incur or authorize the expense.

3.14.3 Unlawfully Obtaining Business Intelligence

Gathering information about our competitors, often called competitive intelligence, is a legitimate business practice. It helps us stay competitive. However, we must always obtain business intelligence appropriately from legitimate sources. You must not steal or unlawfully use the information, material, products, intellectual property, or proprietary or confidential information of others, including that of business partners and collaborators. These rules also apply to consultants, vendors, and other partners we retain.

3.14.4 Fair Sales and Marketing Practices

We compete vigorously for business based solely on the merits of our products and services. We do not participate in any activities that unfairly harm competition. We want to win, but we want to do so fairly. We will accurately represent Cape in our products, services, marketing, advertising, and sales materials. We can promote our products and services and make comparisons between us and our competitors. Deliberately misleading messages, leaving out important facts, or false claims about our products and services or competitors are inconsistent with our policies. Antitrust laws govern relationships between a company and its competitors. Collusion among competitors is illegal, and the consequences of violating this law are severe. You must not enter into an agreement or understanding of any kind with competitors concerning prices, discounts, or other terms or conditions of sale; profits or profit margins; costs; allocation of products, services, customers, markets, or territories; boycotts of customers or suppliers; or bid on the intent to bid or even discuss or exchange information on these subjects.

3.14.5 Selecting Suppliers

We rely on our supplier relationships for our success. To achieve our mission, we require suppliers who share our commitment to building trust with our stakeholders, delivering exceptional work, and adhering to the law. We select the best suppliers for the job by carefully considering their proven track record, reputation for integrity, and other relevant merits, without favoritism. We work to eliminate child labor, human trafficking, and other labor abuses in our supply chain.

3.14.6 Global Trade

We are committed to fully complying with all applicable trade laws and regulations (see our Trade Compliance Policy) regarding the import and export of products, services, and technology. We also comply with sanctions that prohibit business with affected countries, regions, individuals, or entities. If your role involves importing, exporting, or transferring goods, services, or technology, you must ensure that such transactions comply with applicable import/export laws and embargoes. If in doubt, consult our Legal department.

3.14.7 Political Activities

All political contributions and lobbying activities made or conducted on behalf of Cape, including sponsoring events for political candidates and using the Company’s facilities for political events, must be pre-approved by our Legal and Compliance teams. We do not allow any political contribution, gift, or use of Company assets in exchange for unlawful action by federal, state, or local government officials. You are free to engage in political activities so long as you do so in an individual capacity and do not create the impression that you are doing so on behalf of the Company or use any of the Company’s assets, facilities, or resources in support of personal political activities.

3.15 Policy Compliance

- Understand and adhere to all Cape policies and procedures.
- Ensure compliance with all legal and regulatory requirements relevant to your role and responsibilities.
- Seek clarification from your supervisor, manager, or the Compliance team if unsure about any policy or procedure.
- Report any violations of policies or procedures, or unethical behavior, through the appropriate channels.
- Regularly review and stay up to date on changes to Cape policies and procedures.

3.16 Compliance Measurement

The Compliance team will verify compliance with this Code through various methods (e.g., periodic manager reviews, tool reports, internal and external audits, and employee feedback).

4.0 Actual or Possible Violations

4.1 Reporting Concerns

If you have a concern about actual or possible violations of this Code or any of our policies or procedures, you should report it promptly. You may raise any concern orally or in writing through several channels. Use the channel that is most comfortable for you. Your supervisor or manager is often best positioned to quickly resolve a concern. However, you can always report a problem to the Legal department or the next level of management. Consult the process set forth in Cape's Responsible Disclosure Policy for additional ways to report concerns.

Please note that nothing in this Code (nor any other Cape policy or agreement) limits, impedes, or restricts your ability to contact, report to, or file a charge or complaint with the Securities and Exchange Commission or any other federal, state, or local government agency or commission ("Government Agencies") at any time. This Code also does not limit your ability to participate and/or assist in any investigation or proceeding that may be conducted by any Government Agencies, including providing documents or other information without notice to Cape. Nothing in this Code limits your right to seek and/or receive an award for information provided to any Government Agencies or prohibits you from providing truthful information in response to a subpoena or other legal process.

4.2 No Retaliation

Cape prohibits retaliation against anyone who, in good faith, reports or participates in an investigation of a possible violation of our Code, policies, procedures, or the law. Please contact a member of senior management or the Compliance Officer if you believe that you are the subject of retaliation within Cape.

5.0 Exceptions

Any exception to this Code must be approved in writing by the Compliance team. The Board reserves the right, at its sole discretion, to grant waivers or exceptions to the Code.

5.1 Non-Compliance

Any Cape team member who violates this Code may be subject to disciplinary action, up to and including termination of employment or other relationship with Cape, as well as any civil and criminal liability.

6.0 Responsibilities

6.1 Your Annual Acknowledgment of the Code

Upon hire, and at least annually, as a condition of your employment, you must acknowledge that you have received the Code and understand its rules. New employees will sign an acknowledgment upon starting with Cape. Your annual acknowledgment confirms that:

- You've reviewed the Code, and you are required to comply with the Code; you will comply with the compliance policies and procedures, as well as policies and procedures related to your job responsibilities.
- You will report any questions or concerns about suspected or actual violations of the Code to your supervisor, manager, a member of management, or the Compliance Officer.
- To the best of your knowledge, you have not acted in a manner contrary to the Code.
- You have reported any potential conflicts of interest to the Compliance team.

7.0 Document Management

Cape's Leadership, Information Security, and Compliance team will be responsible for reviewing and updating the Code at least annually, or as needed. Cape employees are responsible for acknowledging the Code upon hire, annually thereafter, or when material changes are made. The Board must approve material amendments to the Code.

Changelog:

Rev	Rev Date	Description of Changes	Editor	Approver	Appr Date
1.0	06/17/24	- Policy drafted, reviewed by Legal - Formatted for consistency - Approval Authority delegated to the Head of Security for minor changes only	Cameron Iati	Board of Directors	07/29/24
1.1	02/27/25	- Minor change, updated Document Management section to match policy format	Cameron Iati	Alek Amrani	02/27/25
1.2	06/06/25	- Minor change, Board oversight language updated	Cameron Iati	Alek Amrani	06/06/25
1.3	06/04/26	- Annual Review	Cameron Iati	Eric Powell	06/05/26