

Loop Future

Code of Conduct

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Applies to	All employees, contractors and representatives of Loop Future globally

Introduction

Loop Future is a software services company built on the belief that technology, done well, makes things genuinely better. We work with clients across the UK, Europe and North America to deliver software that solves real problems — and we do it with a team spread across Portugal, the UK and India.

This Code of Conduct sets out how we expect everyone at Loop Future to behave — not just because it protects the business, but because it reflects who we are and what we stand for. The way we work matters as much as what we deliver.

This Code doesn't try to cover every possible situation. Use it as a guide. If you're ever unsure whether something is the right thing to do, ask yourself: would you be comfortable if your colleagues, your clients, or your family could see exactly what you're doing and why? If the answer is no, stop and ask someone.

This Code sits at the top of Loop Future's policy framework. Section 8 lists the related policies that sit beneath it and provide detailed rules on specific topics. Where this Code and a related policy both address the same topic, the more detailed rules in that policy apply.

Who This Applies To

This Code applies to everyone who works for or represents Loop Future — employees, contractors, consultants and anyone engaged on a temporary basis, regardless of which entity they are employed through or which country they are based in.

For contractors and consultants: complying with this Code is a condition of your engagement with Loop Future. The Code does not itself create an employment relationship or alter the terms of your individual contract. If there is any conflict between the Code and your contract, speak to HR or Legal.

If you manage third parties on Loop Future's behalf — suppliers, partners or sub-contractors — you are responsible for ensuring they understand and operate to standards consistent with this Code. Where third parties handle client data or have access to our systems, they must meet the same standards we set for ourselves.

Our Values

Company values are pointless if they're not lived every day. At Loop Future, our values underpin how we work, be that with each other, with our clients, or with the world around us. They're not aspirational posters; they're the standard we hold ourselves to and the action-oriented phrasing is directly intended to influence behaviours & conduct, and to provide guidance to our teams when unclear on how to proceed.



Obsess about customer success

We always act in the customer's best interests and aim to delight in every interaction.

So we always — within the boundaries of other elements of this Code of Conduct — do what's right for the customer.

Drive progress globally

We bring the sum of our team and capabilities to bear, always learning and evolving.

Pro-actively collaborate & communicate

We help others, we ensure information is shared and we team together.

So if there's a concern or an issue, we raise our hands and tell the people who need to know as soon as we're aware.

Create positive impact every day

We leave everything we touch better at the end of the day than when we started.

Enable everyone to thrive

We value everyone as people, celebrating differences and stepping up to ensure everyone succeeds.

So if we can help someone with what they're doing, we do.

Standards of Conduct

The sections below set out what we expect of everyone at Loop Future. These are principles, not exhaustive rules. Apply them with common sense, and if you're unsure, ask.

Integrity and Honesty

Be straight with people. Be honest with colleagues, clients, partners and anyone else we deal with. Don't misrepresent Loop Future, your own role, or your capabilities.

If something has gone wrong — with a project, a deadline, a piece of work — say so promptly. Cover-ups always make things worse. Clients and colleagues can deal with problems; what they cannot deal with is finding out they were not told the truth.

Keep accurate records. Whether it is timesheets, expenses, project documentation or communications, what you record should reflect reality.

Confidentiality and Protecting Client Information

Working with clients means they trust us with their information. That trust is not negotiable. You must:

- Not share client data, code, business information or anything else they have shared with us, beyond what is needed to do the work
- Not use client information for any purpose other than the work we have been engaged to do
- Take care with how you store, transfer and dispose of confidential information — follow Loop Future’s data handling procedures
- Not discuss client matters in public places where you might be overheard

If you are unsure whether something is confidential, treat it as if it is. When in doubt, ask before sharing.

This obligation does not end when your engagement with Loop Future does. Your duty of confidentiality continues after you leave.

Intellectual Property and Work Product

Work product created by Loop Future employees and contractors in the course of a client engagement — including code, designs, documentation, analysis and any other deliverables — belongs to the client, unless the contract for that engagement specifies otherwise. If you are unsure who owns a particular piece of work, ask your project lead or Legal before using or sharing it.

Do not use client work as a reference, portfolio example or case study without explicit client permission. This includes code, screenshots, designs or project details.

Do not bring into Loop Future work any intellectual property you do not have the right to use — whether that is code from a previous employer, third-party licensed content, or AI-generated output that may carry copyright risk. You are responsible for ensuring that what you contribute to a project is yours to use.

If you are unsure about the IP position on any piece of work, ask your project lead or Legal before proceeding.

Data Protection

Loop Future handles personal data belonging to clients, employees and others. We are required by law to handle it lawfully, fairly and securely. The rules that apply depend on where the data comes from and where it is processed:

- UK GDPR applies to data relating to UK individuals
- EU GDPR applies across our EU operations, including Portugal, Germany and the Netherlands
- Switzerland’s nDSG (Federal Act on Data Protection) applies to Swiss personal data and broadly mirrors GDPR
- India’s DPDP Act (Digital Personal Data Protection Act) applies to personal data processed in India

Our clients in these jurisdictions may also impose additional contractual data protection requirements. Where their requirements are stricter than applicable law, their requirements take precedence.

In practice this means:

- Only collect and use personal data for a clear and legitimate purpose
- Do not share personal data without proper authorisation
- Store personal data securely and only for as long as necessary
- Report any data breach, or suspected breach, to your manager and the CISO immediately — do not wait to see whether it becomes a problem

Data protection is not just a legal box to tick. For our clients, it is a material risk, and how we handle their data is a core part of our value to them.

See also: Best & Safe IT Practices Policy — for detailed security controls and incident reporting procedures.

Anti-Bribery and Corruption

We do not pay bribes. We do not accept them either. This applies everywhere we operate, with no exceptions for local custom or industry practice.

The UK Bribery Act 2010 applies to Loop Future and to everyone working on its behalf, regardless of where they are based. It is one of the strictest anti-bribery laws in the world and covers:

- Offering, promising or giving a bribe to any person, anywhere
- Requesting, agreeing to receive, or accepting a bribe
- Bribing a foreign public official
- Facilitation payments — small payments to speed up routine administrative processes — which are explicitly prohibited

If anyone — a client, partner, supplier or official — asks you to make a payment that feels improper, or offers you something in return for favourable treatment, do not do it. Report it immediately to your manager or Legal.

Loop Future can face unlimited fines and criminal prosecution if it fails to prevent bribery by the people who work for it. Everyone has a role to play in preventing that.

Conflicts of Interest and Gifts

A conflict of interest arises when your personal interests — financial or otherwise — could influence, or be seen to influence, how you make decisions in your role at Loop Future.

Common examples include:

- Working for, or having a financial stake in, a competitor or client without disclosing it
- Using Loop Future resources, contacts or information for personal gain
- Directing work to a supplier in which you have a personal or financial interest
- Making hiring or promotion decisions about someone you have a close personal relationship with

If you think you might have a conflict — or if you are simply not sure — declare it to your line manager or HR promptly. It is far better to flag it early than to have it surface later.

On gifts and hospitality: a reasonable token of appreciation — a meal, a bottle of wine — is generally fine. Anything of significant value, anything that could reasonably be seen as influencing a business decision, or anything that comes with an expectation attached, should be declined and reported. If you're in any doubt, check before accepting or offering.

Treating People Fairly

We do not discriminate. That is not just a legal requirement — it is fundamental to who we are and core to our value of enabling everyone to thrive.

No one at Loop Future should be treated differently or disadvantaged because of their age, sex, gender identity or expression, race, ethnicity, nationality, disability, health condition, religion or belief, sexual orientation, pregnancy or maternity, or any other characteristic protected by law in the relevant jurisdiction.

This applies to every aspect of working at Loop Future: hiring, pay, promotion, day-to-day treatment and access to development opportunities. It applies equally across all our locations — including where local law may set a lower bar than the standard we expect of ourselves.

Harassment — whether sexual, racial, or based on any other characteristic — will not be tolerated. This includes behaviour in the office, at client sites, at work events and in online communications. Harassment does not have to be intentional to be unacceptable; the impact on the person experiencing it is what matters.

If you witness harassment or discrimination — whether directed at you or at someone else — report it. See 'Raising a Concern' for how. Anyone who raises a concern about discrimination or harassment in good faith will be protected from retaliation. Loop Future also operates a formal grievance procedure, which is separate from this Code and is available to any employee who wishes to use it.

Health, Safety and Wellbeing

We have both a legal and human obligation to keep people safe at work. Follow the health and safety rules that apply to your location. Report hazards, incidents and near-misses — even when nothing has actually gone wrong yet.

For those working remotely, this includes taking reasonable care of your home working setup: adequate lighting, a suitable desk and chair, and not working in circumstances that put you at risk.

We also care about mental wellbeing. If you are struggling — with workload, a colleague situation, or something outside work that is affecting you — speak to your manager or HR. We would far rather hear about it early than find out after the fact.

Managers have a particular responsibility here: to notice when someone in their team is not coping, to create space for honest conversations, and to take action when needed.

Using Company Resources Responsibly

Loop Future's equipment, systems, time and money exist to serve the business. Use them sensibly. This includes:

- Computers, software licences and communication tools — use them for their intended purpose
- Expenses — claim what you are genuinely entitled to, accurately, with appropriate documentation
- Paid time — apply it to your work

Occasional personal use of work tools — a personal email, checking the news — is not an issue. What is not acceptable is sustained personal use that detracts from your work, or using company resources for a personal business or side project.

Take reasonable care of equipment provided to you. Report loss, theft or damage promptly.

See also: Devices Policy and Laptop Policy — for detailed rules on company-issued and personal devices used for work, physical security, and data storage.

AI and Technology Tools

Loop Future maintains a list of approved AI tools. The current standard approved tools are Claude Code, Claude.ai Pro, GitHub Copilot, Microsoft Copilot, and Claude Design — these can be used freely for work, within the data handling rules below. Any AI tool not on the approved list requires sign-off from your project lead before use on Loop Future work.

The key rules, regardless of which tool you are using:

- Do not input client data, PII, or confidential information into any AI tool without explicit approval. This applies to all tools, including approved ones, where the data is outside the scope they have been approved for.
- You remain responsible for checking and validating any AI-generated output before it is used or delivered. These tools make mistakes — confidently. Check the work.
- If you use AI to produce work for a client, you are responsible for that output. The client is paying for your judgement, not just the result.
- Do not run AI coding tools with production credentials or live system access loaded.

The same principle applies to all technology tools: use what has been approved, and seek approval before introducing new tools that handle client or company data.

See also: AI Tools Policy — for the full approved tool list, access process, data classification rules, and how to request a new tool.

Social Media and External Communications

When you post publicly — on LinkedIn, social media, forums or anywhere else — people may associate what you say with Loop Future, even when you are speaking personally.

This means:

- Do not share confidential information about Loop Future, our clients or our work
- Do not make statements about clients, competitors or colleagues that are misleading, disparaging or could cause reputational damage
- Avoid online disputes or arguments that could embarrass you or Loop Future
- Be mindful of what you say about work matters in public — even seemingly throwaway comments can travel further than intended

Speaking to the press, media or analysts about Loop Future requires prior approval from the leadership team. If a journalist or publication approaches you, let leadership know before you respond.

None of this prevents you from having a normal professional online presence, sharing your work or speaking positively about Loop Future. Common sense is the guide.

Environmental Responsibility

Creating positive impact every day includes our impact on the environment. We take this seriously — not as a compliance exercise, but as a genuine commitment that runs through how we operate.

In practice this means avoiding unnecessary waste, travel and resource consumption; thinking about the environmental footprint of the decisions you make; and supporting Loop Future's sustainability initiatives as they develop. We acknowledge there is always more to do, and we welcome ideas from the team on how to do better.

Legal and Regulatory Compliance

We operate across multiple jurisdictions — Portugal, the UK, India and Switzerland — and serve clients in others, including Germany, the Netherlands and the USA. Legal requirements vary, and we take them seriously in all of them.

When our clients are subject to particularly high regulatory standards — for example, US-listed companies with Sarbanes-Oxley obligations, Swiss financial institutions, or businesses operating under strict sector-specific rules — we match our standards to what they need from us as a supplier.

If your work touches on an area you are uncertain about — employment law, tax, export controls, financial regulation, sector-specific compliance — do not guess. Ask Legal or your manager. Any concerns about legal or regulatory risk should be raised promptly. Delayed disclosure of a legal issue almost always makes it worse.

Your Responsibilities

Regardless of your role or seniority, everyone at Loop Future is responsible for:

- Reading, understanding and following this Code
- Applying it consistently — not just when it is easy or convenient
- Leading by example — how you behave sets the tone for the people around you
- Raising concerns promptly when you see something that does not look right
- Keeping up to date with Loop Future's policies as they evolve

Managers have an additional responsibility: to create an environment where people genuinely feel safe to raise concerns, and to act on those concerns promptly and fairly. A concern that reaches a manager and goes nowhere is a failure of the system.

Not knowing about a breach is not a defence if you had reason to suspect it and chose not to act.

Raising a Concern

If something does not feel right — a potential breach of this Code, a regulatory issue, a safety concern, or a situation you cannot quite put your finger on — raise it. You will not be penalised for raising a concern in good faith.

How to raise a concern

You have two routes.

Directly — speak to your line manager, HR, Legal, or any member of the Excom (leadership team). This is the right first step for most situations. If your concern involves your line manager, go directly to HR or a member of the Excom instead. This Code will never ask you to raise a concern with the person your concern is about.

Anonymously — Loop Future uses Factorial as its secure, anonymous reporting channel. You can submit a report at <https://theloopco.factorialhr.pt/complaints> without identifying yourself. Reports are encrypted and cannot be traced back to you. The channel also

supports two-way anonymous messaging, so we can ask follow-up questions and keep you updated without ever knowing who you are.

Use whichever route feels right. The anonymous channel is there for anyone who does not feel comfortable raising something directly, for whatever reason.

What happens after you report

We will acknowledge your report within 7 days and aim to keep you updated throughout. We will tell you the outcome within 3 months where we are able to do so. All concerns are handled confidentially and shared only with those who need to know in order to investigate.

Protection from retaliation

Anyone who raises a concern in good faith is protected. Retaliation — dismissal, demotion, disciplinary action, harassment, or any other adverse treatment — against someone for raising a concern is itself a serious breach of this Code and may be unlawful.

If you are reporting a suspected breach of law or regulation, you have additional legal protections. In Portugal, EU Directive 2019/1937 is transposed through Lei 93/2021, which provides strong protections against retaliation for qualifying reports. In the UK, the Public Interest Disclosure Act 1998 provides equivalent protection. These protections apply regardless of which reporting route you use — direct or anonymous.

If you believe you have experienced retaliation for raising a concern, report it immediately to HR or a member of the leadership team.

One limit

Raising a concern you know to be false is itself a breach of this Code.

Consequences of Breach

Breaching this Code is a serious matter. We will investigate concerns promptly and fairly. Depending on the nature and severity of a breach, consequences may include:

- A formal written warning
- Disciplinary action, up to and including dismissal — subject to applicable employment law in your location
- For contractors and consultants: termination of engagement
- In cases involving illegal activity: referral to relevant regulatory or law enforcement authorities

Serious breaches — such as fraud, bribery, significant data protection violations, or harassment — will always result in a formal investigation and may result in dismissal regardless of seniority or length of service.

Any formal disciplinary process will follow Loop Future's disciplinary procedure for your jurisdiction, which is separate from this Code. This Code does not override your statutory employment rights or any contractual rights you hold. HR can advise on the process that applies to you.

Related Policies

This Code sits at the top of Loop Future’s policy framework. The following policies provide detailed rules on specific topics covered by this Code. All employees and contractors are expected to be familiar with the policies relevant to their role.

Policy	What it covers
Best & Safe IT Practices Policy	Passwords, MFA, anti-malware, phishing, device security, VPN, and security incident reporting. The foundational security baseline for everyone.
AI Tools Policy	Approved AI tools, the process for requesting access or new tools, data classification rules, and conduct expectations when using AI.
Devices Policy	Company-issued and personal (BYOD) devices used for work, including laptops, phones, storage and physical security.
Laptop Policy	Laptop provision, standard specifications, care and replacement.
Data Protection Policy	Detailed rules on how Loop Future collects, stores, processes and protects personal data under UK GDPR, EU GDPR, nDSG and the DPDP Act. (In development — refer to the data protection section of this Code and the Best & Safe IT Practices Policy in the interim.)

Where this Code and a related policy address the same topic, the more detailed rules in the policy apply. Where any two policies conflict, the more restrictive rule applies. If you are ever uncertain which rules apply to a situation, ask HR or Legal.

Document Information

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Questions about this Code? Contact HR or Legal.