

Cloutflow Code of Business Conduct

Cloutflow is committed to conducting business with honesty, integrity, transparency, accountability, and respect.

Every employee, consultant, creator partner, supplier, vendor, and representative of Cloutflow is expected to act in a way that protects the trust of our clients, creators, colleagues, audiences, and the wider creator economy.

We will comply with applicable laws, advertising standards, platform rules, contractual obligations, and industry codes wherever we operate.

Our Standard

This Code defines the standards we expect from everyone who works with or represents Cloutflow.

Who This Code Applies To

This Code applies to:

- Cloutflow employees
- Founders and leadership
- Consultants and freelancers
- Creator managers
- Campaign teams
- Strategy, planning, procurement, operations, finance, product, data, and tech teams
- Vendors, suppliers, and production partners
- Creator partners where applicable
- Any person or organisation acting on behalf of Cloutflow

Every person covered by this Code is responsible for understanding it, following it, and raising concerns when something feels wrong.

Compliance With Laws & Regulations

Cloutflow will comply with applicable national and international laws, including those related to advertising, data protection, anti-bribery, anti-corruption, taxation, employment, intellectual property, consumer protection, competition, and platform governance.

Where local laws, platform rules, client requirements, or this Code differ, we will follow the higher standard wherever reasonably possible.

Ethical Client Work

Before accepting work, Cloutflow will consider whether the client, category, campaign, product, or requested content may create legal, ethical, reputational, environmental, social, or human rights risks.

We will not knowingly undertake work that is designed to mislead people, manipulate vulnerable audiences, hide material information, promote harmful behaviour, or damage public trust.

Where a campaign involves sensitive claims, regulated products, children, health, finance, sustainability, social issues, or vulnerable communities, teams must apply extra scrutiny.

Truthful Communication

All business communication must be accurate, clear, and professional.

This applies to:

- Client proposals
- Pitch decks
- Creator recommendations
- Campaign reports
- Performance dashboards
- Case studies
- Invoices
- Contracts
- Internal updates
- Public statements
- Website claims
- Social media posts

We must not inflate metrics, misrepresent creator performance, hide campaign risks, exaggerate capabilities, fabricate case studies, or present paid outcomes as organic.

Creator Recommendations & Campaign Integrity

Creator selection must be based on genuine campaign fit and measurable relevance.

Teams must not recommend creators because of personal relationships, hidden benefits, commissions, pressure, bias, or convenience where those factors conflict with the client's interest.

Creator analysis should consider relevant factors such as:

- Audience fit
- Content quality
- Brand safety
- Authenticity
- Past performance
- Category relevance
- Language and regional fit
- Engagement quality
- Content style
- Commercial suitability
- Compliance history

We must avoid fake creator inflation, manipulated metrics, undisclosed paid engagement, or knowingly using creators with fraudulent audiences.

Sponsored Content Disclosure

Cloutflow supports transparent paid partnership disclosure.

Creators must be informed when content requires disclosure such as paid partnership tags, ad labels, hashtags, platform tools, or other legally required declarations.

Teams must not ask creators to hide, avoid, or weaken disclosures where disclosure is required.

Influence works best when audiences trust what they are seeing. Sneaky ads are not strategy; they are a future crisis deck waiting to happen.

Anti-Bribery & Anti-Corruption

Cloutflow has zero tolerance for bribery and corruption.

Employees, creators, vendors, consultants, and representatives must not offer, give, request, receive, or accept bribes, kickbacks, hidden commissions, personal favours, or improper benefits to win business, influence decisions, secure approvals, manipulate creator selection, alter pricing, or gain unfair advantage.

This applies to interactions with:

- Clients
- Brands
- Agencies
- Creators
- Vendors
- Suppliers
- Government officials
- Platform representatives
- Media partners
- Any third party

Any suspected bribery or improper payment must be reported immediately.

Gifts, Hospitality & Entertainment

Reasonable business hospitality may be acceptable when it is lawful, modest, transparent, occasional, and not intended to improperly influence a decision.

Employees must not offer or accept gifts, entertainment, travel, discounts, benefits, or favours that could create an actual or perceived conflict of interest.

Cash gifts, personal commissions, luxury benefits, hidden creator-side payments, or vendor kickbacks are strictly prohibited.

When unsure, employees must disclose the situation and seek approval before accepting or offering anything of value.

Conflicts of Interest

Employees and representatives must avoid situations where personal interests conflict with Cloutflow's interests or the interests of clients.

Conflicts may include:

- Recommending a creator, vendor, or agency owned by a friend or family member without disclosure
- Taking personal commissions from creators or vendors
- Working with a competing business without approval
- Using Cloutflow data for personal gain
- Running side deals with clients or creators
- Influencing pricing or selection for personal benefit
- Hiring or approving payments for related parties without disclosure

All actual, potential, or perceived conflicts must be disclosed.

Fraud, Misuse & Financial Integrity

Cloutflow will not tolerate fraud, falsification, theft, financial manipulation, tax evasion, or misuse of company assets.

This includes:

- Fake invoices
- Inflated creator costs
- False reimbursement claims
- Manipulated campaign reports
- Misuse of client budgets
- Undisclosed commissions
- Duplicate billing
- Unapproved vendor payments
- Misuse of company cards, tools, data, or accounts

Financial records must be accurate, complete, and maintained according to company processes.

Data Protection & Confidentiality

Cloutflow handles confidential information belonging to clients, creators, employees, vendors, platforms, and the company.

This information must be protected and used only for authorised business purposes.

Confidential information may include:

- Client briefs
- Campaign budgets
- Creator rates
- Creator personal data
- Audience insights
- Brand plans
- Product launches
- Contracts
- Internal dashboards
- Platform data
- Employee information
- Payment information
- Unreleased campaign reports
- Business strategy
- AI models, workflows, and proprietary tools

Employees must not share confidential information externally or with unauthorised internal teams.

Personal data must be handled in accordance with applicable privacy laws and company security practices.

Responsible Use of AI & Technology

Cloutflow uses AI and technology to support better strategy, faster execution, stronger creator discovery, quality checks, pricing intelligence, reporting, and campaign optimisation.

Employees must use AI responsibly. This means:

- Do not upload confidential client, creator, employee, or company data into unauthorised tools
- Do not present AI-generated work as final without human review
- Do not use AI to create misleading claims, fake testimonials, fake creator identities, or manipulated reports
- Do not use AI to discriminate or unfairly exclude creators
- Do not bypass legal, compliance, or quality checks
- Keep human accountability in all important campaign and business decisions

AI is a co-pilot, not a moral escape hatch.

Workplace Conduct

Cloutflow is committed to a safe, respectful, inclusive, and professional workplace.

We will not tolerate:

- Harassment
- Sexual harassment
- Bullying
- Discrimination
- Threats
- Intimidation
- Offensive behaviour
- Retaliation
- Abuse of authority
- Persistent demeaning conduct
- Unsafe behaviour
- Possession or use of illegal substances at work
- Reporting to work under the influence of drugs or alcohol

Everyone at Cloutflow is expected to treat colleagues, creators, clients, vendors, and partners with dignity and respect.

Equal Opportunity

Cloutflow selects, hires, evaluates, promotes, and rewards people on the basis of merit, capability, values, performance, contribution, and potential.

We do not discriminate on the basis of personal characteristics protected by law or inconsistent with our values.

This applies to employment, creator partnerships, vendor relationships, and professional opportunities.

Brand Safety & Content Responsibility

Cloutflow must not knowingly create, approve, distribute, or amplify work that contains:

- Hate speech
- Illegal content
- Discrimination
- Abuse
- Harassment
- Misinformation
- Dangerous instructions
- Sexually exploitative material
- Violence or threats
- Harmful stereotypes
- Unsubstantiated claims
- Content offensive to public decency
- Misleading environmental, health, financial, or social claims

Teams must apply appropriate brand safety checks before creator shortlisting, script approval, content approval, campaign launch, and reporting.

Human Rights, Forced Labour & Child Protection

Cloutflow respects human rights across its business, partnerships, and supply chain.

We will not knowingly work with vendors, suppliers, creators, or partners involved in forced labour, child labour, trafficking, unsafe labour practices, harassment, exploitation, or human rights abuse.

Where minors are involved in content, campaigns must follow applicable laws, platform policies, parental/guardian consent requirements, and child safety standards.

Children should never be exploited for commercial content.

Political Activity

Cloutflow does not make political contributions, provide discounted services, or offer company resources to political parties, candidates, political committees, or political campaigns without formal leadership approval and legal review.

Employees may participate in political activity in their personal capacity, but must not represent personal political views as Cloutflow's position.

Company time, data, tools, funds, or client resources must not be used for personal political activity.

Competition & Fair Dealing

Cloutflow competes fairly.

Employees must not engage in anti-competitive behaviour, price fixing, market allocation, bid manipulation, misuse of confidential competitor information, or unfair business practices.

We must deal honestly with clients, creators, vendors, platforms, competitors, and the market.

Intellectual Property

Cloutflow respects intellectual property rights.

Employees and partners must not use copyrighted music, images, footage, scripts, designs, brand assets, creator content, or third-party materials without appropriate rights, permissions, licences, or approvals.

Campaign content ownership, usage rights, whitelisting rights, exclusivity, boosting rights, platform usage, duration, geography, and edits must be clearly documented.

Supplier & Vendor Conduct

Cloutflow expects vendors and suppliers to operate ethically, legally, and responsibly.

Vendors must comply with applicable laws, avoid bribery and corruption, respect human rights, protect confidential information, follow agreed quality standards, and maintain safe working practices.

Where vendors support production, dispatch, events, editing, data, technology, staffing, or creator operations, Cloutflow teams must ensure the relationship is transparent and properly documented.

Reporting Concerns

Employees, creators, vendors, and partners are encouraged to raise concerns if they believe this Code has been violated.

Concerns may include:

- Fraud
- Harassment
- Bribery
- Data misuse
- Misleading claims
- Unsafe work
- Discrimination
- Conflicts of interest
- Creator exploitation
- Vendor misconduct
- Financial irregularities
- Campaign manipulation
- Unethical client requests

Cloutflow will review concerns seriously and fairly.

Retaliation against anyone raising a concern in good faith is prohibited.

Accountability

Violations of this Code may result in corrective action, including training, process changes, disciplinary action, termination of employment, termination of vendor or creator relationships, legal action, or reporting to authorities where required.

Leaders and managers are expected to set the tone by example.

Compliance is not just a legal function. It is everyone's job.