

Synthetic Users Transactional Authority Levels

Document ID: CRA-33.3.1-TAL-001

Version: 1.0

Effective Date: March 25, 2026

Last Updated: March 25, 2026

Owner: CEO — Kwame Ferreira

Approved By: CEO — Kwame Ferreira

Classification: Internal – Confidential

CRA Control: CRA 33.3.1

1. Purpose

This document formally defines who within Synthetic Users, Inc. is authorized to approve financial commitments, operational decisions, and system-level actions — by role, individual, and threshold. It ensures that all material transactions and decisions are subject to appropriate authorization and that no single individual can unilaterally approve transactions beyond their designated authority level.

2. Scope

This document applies to:

- All financial commitments (expenditure, contracts, subscriptions)
- All operational authority delegations (hiring, vendor onboarding, system access)
- All system-level privileged actions
- All employees, contractors, and directors of Synthetic Users, Inc.

3. Organizational Roles

Role	Individual	Reports To
Chief Executive Officer (CEO)	Kwame Ferreira	Board / Founders
Chief Financial Officer (CFO)	Zumbi Ferreira	CEO
Chief Technology Officer (CTO)	Artur Ventura	CEO
Head of Research / Operations	Samantha Reis	CEO
Senior Engineer	Davi Campos	CTO
Engineer	Tiago Coelho	CTO
Operations Associate	Joao Rocha	Head of Operations

4. Financial Authority

4.1 Expenditure Approval Thresholds

Transaction Value	Required Approver(s)
Up to \$1,000	CTO (technology) or CFO (operations/finance)
\$1,001 – \$10,000	CTO + CFO joint approval
\$10,001 – \$50,000	CEO approval required
Above \$50,000	CEO + CFO joint approval
Any amount — external legal or regulatory commitments	CEO only

4.2 Specific Financial Transaction Authority

Transaction Type	Authorized By
Employee payroll	CFO (Zumbi Ferreira)
Contractor invoices	CTO (technology contractors) or CFO (other)
SaaS / software subscriptions	CTO up to \$1,000/month; CEO above
Cloud infrastructure (AWS, Render)	CTO up to \$10,000/month; CEO above
Vendor contracts (new)	CEO; CFO for renewals below \$10,000
Client refunds	CFO up to \$5,000; CEO above
Bank transfers	CFO initiates; CEO authorizes for amounts > \$10,000

5. Operational Authority

Activity	Authorized By	Notes
New hire offer letters	CEO	All permanent hires
Contractor engagement (< 90 days)	CTO (technical) or CEO (other)	Must include written SOW
Contractor engagement (≥ 90 days)	CEO	Requires CFO budget confirmation
Employee termination	CEO	CFO notified for payroll
Performance improvement plans	CEO + relevant department lead	
New vendor onboarding	CTO (technical vendors) or CFO (other)	DPA required where applicable

Vendor offboarding	CTO (technical) or CFO (other)	Confirm data deletion
Customer contract execution	CEO only	Per Signing Authority Policy
NDA execution	CEO only	Per Signing Authority Policy
JPMC-specific commitments	CEO; CTO for technical commitments within existing contract scope	
Press releases / public statements	CEO	
Regulatory filings	CEO + Legal advisor	

6. System-Level Authority

System Action	Authorized By	Requires Second Approver?
Production database access	CTO	Yes — CEO for break-glass
Production deployment (planned)	Engineering Lead	No — via CI/CD
Emergency production rollback	CTO	No — immediate action permitted; post-event review required
New LLM provider enablement	CTO	Yes — CEO informed
API key creation (production)	CTO	No — logged automatically
API key rotation (production)	Engineering Lead	No

Infrastructure scaling changes	CTO	No — within approved budget envelope
Security group / firewall changes	CTO	No — reviewed in weekly security standup
New user provisioning (internal admin)	CTO	No
Admin privilege grant (internal)	CTO	Yes — CEO approval for financial system access
JPMC-specific system configuration	CTO	Yes — JPMC must confirm in writing for material changes

7. Exception Process

When a transaction or action falls outside the defined authority levels or requires urgent action:

1. The requesting party documents the exception in writing, including the nature of the request, the business justification, and the time constraint
2. The next-level authority reviews the exception request
3. If approved, the approval is recorded in the company's document management system with date and approver identity
4. The exception is reviewed at the next quarterly governance meeting to determine if the authority matrix should be updated
5. All exceptions are logged and reported to the CEO monthly

No exception may be approved by the same individual making the request.

8. Segregation of Duties

The following segregation of duties controls are maintained to prevent conflicts of interest and unauthorized transactions:

- **Initiator ≠ Approver:** The person requesting a financial transaction may not also approve it
 - **Payment initiation ≠ Payment authorization:** Bank transfers are initiated by the CFO and authorized by the CEO for amounts > \$10,000
 - **Vendor selection ≠ Contract execution:** Technical vendor selection (CTO) is separate from contract execution (CEO)
 - **System access requests ≠ Access grant:** Engineers request access; CTO (or CEO for elevated rights) grants it
 - **No single-person JPMC transactions:** All actions taken in connection with JPMC client engagements involving financial commitments require both CTO (technical) and CEO (commercial) awareness
-
-

9. Governance and Re-approval

- This document is reviewed and re-approved annually or when organizational roles change materially
 - Any change to authority thresholds requires CEO approval
 - All role holders listed in this document must confirm their understanding of their authority levels in writing annually
 - A copy of this document is maintained in the legal documentation repository and in the JPMC SCA evidence package
-

10. Review

This document is reviewed annually by the CEO and CFO and updated to reflect any changes in organizational structure, personnel, or business scale.

11. Related Documents

- [Signing Authority Policy](#)
 - [Anti-Bribery & Anti-Corruption Policy](#)
 - [Employee Code of Conduct](#)
 - [Third-Party Risk Management Policy](#)
 - [Change Management Policy](#)
-

Synthetic Users, Inc. — 4223 Glencoe Ave, Suite C215-523, Marina del Rey CA 90292