

C

CODE OF ETHICS



Softtek



Softtek

Index

Letter from the President

01. Guiding principles

02. Our Commitment to Integrity

Our daily commitment

Our commitment to inclusion

Our commitment against corruption

Our commitment against monopoly

03. Integrity in our relationships

Conflict of interests

Promoting an adequate environment

04. Information integrity

Accurate and reliable records

Communication and Financial Information

Protecting Information

05. Integrity in the use of company technology and assets

Adequate use of social networks

06. Integrity in society

Environment

Contributions to NGOs

07. Integrity in action

Decision making

Integrity Line

LETTER FROM THE PRESIDENT

Since our inception and up until now we have built long-term relationships with each of our Stakeholders: our Softtekians, our shareholders and certainly with our clients; We have created and maintained a reputation that accompanies us in each of the challenges and objectives that we have set for ourselves. By mentioning the name Softtek, we have achieved that each of the attributes that has earned us a privileged place within the IT industry materialize. Consolidating ourselves as a global service company involves reaffirming our commitment to be and act as a company with high ethical standards in which we are governed by fundamental values such as integrity, honesty, and respect.

That is why I invite you to read this Code of Ethics and Conduct that, beyond being a guide, is a reflection of those behaviors that have allowed us to generate a brand value and a reputation for which we are all responsible for. Let us be aware that each of our individual actions has a consequence and it is precisely that, in our strength as a group, where we will continue to transcend.

Sincerely,

Blanca Treviño



Softtek



01. GUIDING PRINCIPLES

Morality refers to the way people act based on their point of view in relation to good or evil. Therefore, ethics refers to the set of principles, rules or norms that govern the conduct of the person in any area of life.

In this code we will focus on ethics.

At Softtek we are convinced that integrity, honesty and respect are not only desired values, but an obligation and a necessity if we want to transcend and leave a mark in the business world. That is why since our creation we have been committed to developing our business with integrity, honesty and respect. Therefore, we build trust by fully executing what we promise, assuming that our commitment must be supported by the highest ethical standards.

By fostering an ideal environment where talented and self-determined people create amazing things, we understand that such an environment must be one of respect for fundamental human rights, in a context of diversity and inclusion, ensuring that we are all treated with dignity and equality. We assume that each of us is committed to excellence by improving at all times.



To achieve this goal, we know that Softtek's reputation is in our hands, and it will be reflected in every act or decision we make. Our Board of Directors, Directors, Leaders, as well as each one of us who make up the Softtek community understand this responsibility and that our actions are guided at all times by an ethical and integral spirit. Likewise, this code is expected to be followed by anyone acting on behalf of Softtek, be it consultants, suppliers, agents, etc.



Integrity: Quality of acting in an upright, proven and faultless manner without affecting our person, our personal objectives, or the objectives and interests of third parties.

Honesty: Respect for the truth. Offer what we can accomplish and strive to achieve it.

Respect: Treat people with dignity and strive to understand and act empathically towards their views and feelings.

2. OUR COMMITMENT TO INTEGRITY

Generating trust implies, in addition to complying with what is promised, complying with it fully, truthfully and within the law. That is why we all must know and follow this Code, as well as comply with applicable local and international laws and with Softtek's [policies and guidelines](#). Failure to comply diverts us away from our essence and objective, which could lead to civil and / or criminal liability for the offender; even reaching the end of their employment or professional relationship.

Our leaders have an additional responsibility, since, in addition to being models of integrity, they must help deter any potential act that puts the integrity of the company or people at risk, acting when needed, accelerating any report that your people require.

OUR DAILY COMMITMENT

Know our [Cultural Platform](#) and, based on this, behave according to our beliefs, pursue our purpose and be guided by our essence. Understand that each of us is a representative of Softtek and that with every action and decision we make, we confirm and shape the type of company that we are and that we want to be.

Inclusion is the creation of a space of respect where diversity is valued and does not represent a dilemma so that everyone has access to equal opportunities.

OUR COMMITMENT TO INCLUSION

At Softtek, we recognize that talent is diverse, we respect the identity and living conditions of each person, and we promote fair treatment and opportunities.

No employee will be discriminated against for reasons of race, sex, sexual orientation, gender identity or expression, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic origin, social condition, disability, age, membership of a union or any other reason contemplated by law in the countries where we have operations; In this context, we encourage you to report any behavior that violates this Code and our [Inclusion Policy](#).

Every person who works in Softtek must have their human rights respected and guaranteed and may not, in any way, be forced to suffer physically or psychological harm of any kind as a consequence or as a result of their work. Thereby reaffirming our commitment to respect the [universal declaration of human rights](#).

Human rights: These are basic rights that among others are freedom of expression, privacy, health, life, liberty and security, as well as an adequate standard of living; These are inherent to all people, without any distinction.





Zero tolerance for bribery

Employees may not make, authorize, accept or request bribes or acts of corruption, whether for personal or collective benefit, that influence or may influence decision-making.

Gifts or invitations are not considered corruption, always and when they are modest and common in a business environment. No cash, cryptocurrency gifts or anything equivalent to money should be accepted.

OUR COMMITMENT AGAINST CORRUPTION

Behaving with integrity and honesty implies, among other things, avoiding any fraudulent behavior or that could be interpreted as such, deserving special attention to comply with anything concerning the anti-corruption laws applicable in the countries where Softtek has operations or offices [1] [2].

We remain free from corruption, not accepting or offering, directly or indirectly, any type of payment, gift or gratuity from or to any third party both internally and externally to obtain or maintain our business or obtain any other competitive advantage.

Bribery: Offering or giving money or gifts with the intention of obtaining something illegally.

Extortion: Pressure that is exerted on someone through threats to force them to act in a certain way to obtain some benefit, be it financial, material or of any other nature.



BRIBERY AND EXTORTION

It is strictly forbidden to ask or accept, offer, or give any kind of bribe, extortion, or any other illegal benefit that goes against fundamental human rights. Any such offers or proposed settlements or apparent intent to settle through bribery or extortion should be reported immediately.

OUR COMMITMENT AGAINST MONOPOLY

We are committed to complying with all laws and regulations applicable to our business. It is our responsibility to seek the appropriate advice on legal requirements and other pertinent aspects either with our direct leader, with the Local or Global Ethics Committee or with the person we deem appropriate.

It is forbidden to discredit competitors or their products or services or to manipulate, hide or present a distorted view of reality to obtain illicit profits, as well as practices and behaviors that aim to restrict legal and free competition.

Therefore, special attention is required for the laws relating to international business and antitrust or anti-competition, which if breached may damage the reputation of the organization and cause legal problems for both Softtek and our clients.





3. INTEGRITY IN OUR RELATIONSHIPS

CONFLICT OF INTERESTS

Doing business involves interacting with other people and with multiple interests, so it is expected that our business decisions are based on the best interests of Softtek and not on personal interests or relationships.

Conflict of interest refers to situations where our own interests may influence the way decisions are made by interfering with Softtek's interests, which includes double bind relationships. Therefore, you must act in the best interest of Softtek and exercise a sound judgment, free of personal interests or divided loyalties, you must

avoid any conflict of interest. Likewise, those situations that promote, create or may lead to, or be considered an imminent or potential risk between personal benefit and Softtek's interests, must be identified in order to properly manage them.

RELATIONSHIPS WITH CUSTOMERS AND SUPPLIERS

Due to our essence and purpose, we seek to maintain long-term relationships with our clients and suppliers, and in these cases a conflict of interest could be generated if we are intimate with other employees. That is why we suggest avoiding it, but if it happens, the leader must be informed to avoid any type of conflict of interest.

OPERATIONS WITH RELATED PARTIES

They are those that are carried out between a Softtek employee and another individual between whom there is a patrimonial, family and / or professional bond. In Softtek, the relationship between related parties is not prohibited, since it does not imply a conflict of interest by itself; However, it can be favored or interpreted in this

way and that is why we suggest avoiding them, or following the procedures stipulated by the purchasing area, notifying them in advance of the type of relationship.

For no reason should you participate in or attempt to influence decisions or business negotiations related to Softtek that may benefit or appear to benefit a family member, partner, or a business in which a family member or partner is involved, or where they have a direct or indirect financial interest that could be detrimental to Softtek's interests. In any case, the protocol established in the [conflict of interest policy](#) must be followed.

RELATIONSHIPS BETWEEN EMPLOYEES WITH A REPORT LINE OR WITH A RELATED PARTY

In order to avoid possible conflicts of interest where an environment of threat or hope of some benefit is generated, we suggest not to become more intimate beyond what is strictly professional between employees with direct or indirect hierarchical dependence, thus avoiding the possible deterioration of our relationships.

If during the course of their professional journey at Softtek, a couple or family relationship develops between two employees and between them there will be a direct or indirect hierarchical dependence, both must immediately inform their leader via email with a copy to the person in charge of Administration of Human Resources (ARH) and / or People of its headquarters.

In any case, the protocol established in the [conflict of interest policy](#) must be followed.





PRIVILEGED INFORMATION

If while performing our duties within Softtek we have access to privileged information, whether it represents a tacit or implicit business opportunity, that could be interpreted as an unfair advantage, we must inform our leader about it. We will not be able to benefit directly or indirectly from said information, that is, it benefits related parties, such as family members or business partners.

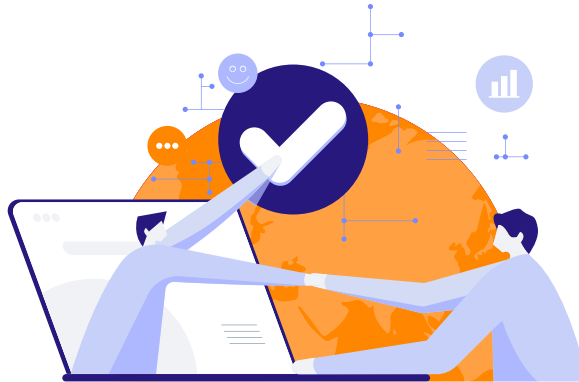
FINANCIAL INVESTMENTS

Another important type of conflict of interest is related to our personal finances. To maintain high ethical and integrity standards, we suggest not having a substantial financial interest with any Softtek client, supplier or competitor.

This includes people with whom you have a family or patrimonial relationship. If it happens, we must notify our leader in writing as soon as possible and ask for the necessary support and advice to handle this situation in the best way possible.

PROMOTING AN ADEQUATE ENVIRONMENT

By mentioning the work environment in our beliefs, we refer to an environment of respect, where diversity is valued and all of us who make up the Softtek community are free from any type of discrimination, intimidation, assault or sexual harassment. To foster this type of environment, we must treat each other, and the people with whom we interact with on behalf of Softtek, with respect and value the contribution that each one makes.



MUTUAL RESPECT

We understand that respect is treating people with dignity and striving to understand them, acting empathetically towards their views and feelings.

This implies acting with integrity, but also when speaking with people, that is, the use of high-sounding, threatening or intimidating words is prohibited when interacting with our stakeholders (employees, clients, shareholders, governments, competition or business partners).

RESPECTING HUMAN RIGHTS

Our decisions about people will never violate their fundamental human rights and their integrity must be always protected. In the same way, we encourage equal opportunities, and we will comply with all applicable laws regarding this matter.

We must not tolerate discriminatory conduct, abuse of authority, assault or harassment of any kind, including that of a sexual nature. You must refrain from making jokes, insults or any other comment that is or could be considered discriminatory or harassing, due to any particular condition, whether due to age, disability, gender, marital status, condition, social class, race, religion, sexual preference or orientation, among others.

Assault and harassment will be prevented, addressed and punished in accordance with the [Anti-Harassment Policy](#).

At Softtek we are committed to creating the **right environment**, where respect is rewarded. The type of negative conduct mentioned in this Code are inappropriate and unacceptable.

If you witness this, we encourage you to immediately let the person know and ask that they stop, referencing the guidelines of this Code.

If you need support, reach out to the People area.

During a possible situation where there is bullying or harassment:

Write down what happened (date, time, place, situation, witnesses) and keep all the evidence of the inappropriate behavior (for example, materials, written conversations, images, among others). Let the person know that kind of behavior is unacceptable and should stop, pointing out that Softtek is firmly opposed to any form of harassment and that kind of behavior can have consequences. Don't hesitate to report what happened, because it represents a breach of this Code and the Anti-harassment policy.

Remember that you can also ask for help from your leader, the People area or a member of the Ethics Committee.

4. INFORMATION INTEGRITY

ACCURATE AND RELIABLE RECORDS

Information is one of the most valued intangible assets within companies. It allows us to make correct and timely decisions, for this reason, it is essential that we fully understand the operational performance of our project, practice, client or area.

We have the obligation to generate timely and truthful reports based on our role and responsibility. When talking about reports we refer (without being limited) to: report of hours, travel and associated expenses, financial reports, billing, forecasts, assignments, risk reports, etc.

Likewise, we ensure that we keep our records up to date and that they contain reliable and truthful information, complying with legal requirements and always reflecting on the truth, that is, they reflect what it is and not what we want it to be. It is crucial to follow our [policies, procedures and internal controls](#).

COMMUNICATION AND FINANCIAL INFORMATION

For certain positions and areas it is essential to understand not only operational but financial performance, which will generate a better understanding of the business and, consequently, a clear and solid basis for decision making. This financial knowledge must be in harmony with the financial disclosure policy contained in the [policies and procedures of the financial area](#) and in accordance with legal requirements.

Any comment on the performance and financial prospects of the company to any external party should be made exclusively by a spokesperson authorized by the Executive Committee.

Therefore, no one who is not an official spokesperson should make, on behalf of the company, any comment about Softtek or its business, plans or financial situation to the media, investors, analysts, external consultants or through chats, blogs or in any other public forum without the consent of the Executive Committee. The financial reports and documents that Softtek presents to government agencies, authorities and in other public communications that the company is obliged to report, must be truthful, complete, accurate, periodic and understandable.

PROTECTING INFORMATION

Due to our business operations, we have access to confidential, privileged or private information on our clients and even Softtek itself. Such information may contain financial data, information about employees, business strategies, proposals, budgets, technical information or any other type of sensitive data.

Unauthorized access or disclosure may harm our clients or Softtek; for this reason, it is prohibited to access, use or disclose the information unless you have the proper authorization to do so. Unauthorized access, use or disclosure may also violate the law. If there is doubt about the sensitivity of the information and its disclosure, we suggest consulting with your Leader.

Remember that to guarantee the protection of information, it is prohibited to access, duplicate, reproduce or make direct or indirect use of private domain information beyond what is necessary to perform your functions and responsibilities within Softtek or to store Softtek information or your clients on private computers or devices or on other means not provided by Softtek.

If you become aware of any incorrect use or treatment of confidential information, promptly notify your Leader or the Information Security Office (security@softtek.com).





5. INTEGRITY IN THE USE OF COMPANY TECHNOLOGY AND ASSETS

Within the company's assets are physical assets, information, and intellectual property. Softtek employees have a duty to protect Softtek property entrusted to them and help protect company assets in general, even after the employment relationship has ended.

We must know and follow the corporate policies and procedures of [Information Security](#), [Physical Security](#) as well as the [Protection of Personal Data](#).

We must ensure at all times that we follow the instructions regarding the handling of passwords and security codes that have been granted to us.

It is our responsibility to preserve and keep our facilities in good condition and to report any misuse of them. We remind you that our facilities are spaces free of any prohibited substance. Finally, we must be alert and report, as soon as we become aware of any loss or risk of loss of Softtek property to the security department or your direct manager.

When we speak of intellectual property we are talking, for example, of computer programs, technical documentation or any other device developed within the facilities, or with Softtek tools, of our clients or that was produced during their employment or professional relationship within Softtek. Said intellectual property must be treated with the appropriate care and must be transferred and assigned to Softtek or its clients, unless there is a previously agreed exception.

Any good that has been provided to you to adequately perform your functions, such as a laptop, desktop, tablets, licenses, access cards, landlines or mobile phones, internet connection, among others, must be used primarily as support to achieve the objectives of the company.

Invalid use of these goods include the processing, sending, extraction, access, display, storage, printing or dissemination of material and information that is fraudulent, hostile, threatening, illegal, sexual, obscene, intimidating, defamatory or, in any case, not related to upright and professional conduct, as well as contrary to the applicable legislation.

At the end of your employment or professional relationship, you must return all the assets that Softtek provided you, including the documentation and any means that contains information that is private or intellectual property of Softtek or of any of its clients.

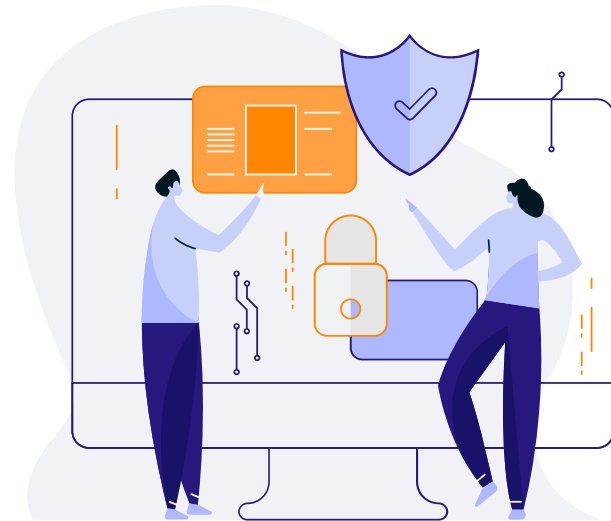
It is prohibited to use or disclose the proprietary information of Softtek or of our clients, unless authorized in writing.

ADEQUATE USE OF SOCIAL MEDIA

Another good of the company, and one of the most valuable, is its reputation. Here we include the appropriate use of technology in relation to both internal and external social networks.

Our behavior must be honest, respectful and following the guidelines described in this Code.

Understand that any comment on social networks is not only equivalent to a comment in person, but is amplified by the reach they have. Therefore, the confidentiality of clients, services and products that we offer in any internal or external social environment, as well as in social gatherings outside of work, must be preserved.



6. INTEGRITY IN SOCIETY

For Softtek, corporate social responsibility is a value creation process where we continually seek an optimal balance between people, the environment and prosperity. This implies that not only the impact on profitability should guide our business decisions, but also the consequences for our people, customers, the communities and the environment where we operate. Our principles are included, among others, in the [ISO 26000](#) guide.

All the actions related to Softtek's social responsibility are achieved thanks to the implementation of the Sustainability Policy, which commits to:

- Fully complying with our purpose, that is, to generate value through technology for our clients, our people and our shareholders.
- Establish annual growth and expansion goals in accordance with our current resources.
- Be a strategic partner in technology for our clients.
- Promote the attraction, development and engagement of our talent. Contribute to the quality of life of our employees.
- Generate wellness circles at each headquarters where we carry out business operations.
- In the purchase of products and services, demand that the social and environmental aspects involved in their production, transportation and use not only comply with current legislation but are within ethical and integrity standards.
- Contribute to the sustainable development of the environment in which we operate. For this reason, we will invest in local businesses and in the people who live and work in the area.



It is important to remember that the Softtek brand must always be associated with quality, efficiency, integrity and with respect for human rights, with fair and safe working conditions and with an environmentally friendly business practice.

ENVIRONMENT

Our commitment to the community means that we must strive to minimize any negative effect our business may have on the [environment](#). This means that we must comply with all applicable environmental laws and regulations in the countries where we operate in order to protect, preserve and sustain issues related to climate change, pollution, water, biodiversity and resource scarcity.

CONTRIBUTIONS TO NGOs

At Softtek we believe that contributions and donations to non-profit organizations are part of our commitment to building corporate citizenship. The areas we support include but is not limited to: education, social welfare, disaster relief, among others.

Before making any charitable contribution on behalf of Softtek we must ensure that they comply with the applicable laws in the countries where we operate, likewise the recipient must be a legal constituted organization that complies with its tax obligations.

Finally, any contribution or donation made will be reflected truthfully and reliably on Softtek's records.





7. INTEGRITY IN ACTION

DECISION MAKING

For Softtek, integrity is everyone's responsibility and for this reason we must strive so that the ethical decisions we make every day are aligned with this code and the values that characterize us. While this code addresses many situations, there may be some cases where doing the right thing may not be so clear.

To ensure correct decision making, reflection is important and before making a decision we invite the Softtek community to answer the following questions

Measurement - What consequences could my actions have? Am I ready to take them on?

Impact - Who do I affect with my decision, even if I can't see it?

Reputation - Would I like this to be posted on my social media? If what I am doing came out into the open, my family, my friends, my leader found out, would I feel comfortable?

Clarification - Do I know and understand the rules? Can I consult someone?

The more we reflect on our actions, the closer we are to the type of company we all want to work for.



In all cases, it is highly recommended before making a complaint that you first discuss it with your leader. If he/she is involved, or you do not think he/she is giving enough follow-up, you can look for someone in the People area. As in the previous case, if the People person is involved, or you think they are not sufficiently following up, you can make a report by going to the Integrity site <https://integrity.softtek.com/report>.

SPEAK UP
#beupright

Remember that when in doubt we can always contact our leader, the corresponding area, People, a member of the Ethics Committee or send an email to integrity@softtek.com.

INTEGRITY LINE

We encourage the entire Softtek Community, including our suppliers, clients and other partners related to the company to inform their leaders, contact Softtek or the Integrity Line, about any conduct that they consider, or may constitute as an infringement of the law or of this Code.

Allowing or tolerating behaviors, avoiding, or coercing to dismiss the report, makes us accomplices, and it is our responsibility to report these behaviors through the [Integrity Line](#).

Softtek will not accept any type of discrimination or retaliation for reporting suspected violations of the Code of Ethics in good faith. For each report received, an objective investigation will be carried out based on the presumption of innocence of the accused and protection of the complainant.

Softtek

