

A photograph of a diverse group of young professionals, including men and women of various ethnicities, gathered around a laptop computer in a modern office environment. They are looking down at the screen, engaged in a collaborative discussion or task. The office has large windows in the background, and the overall atmosphere is one of teamwork and innovation.

# CODE OF ETHICS

**Softtek**



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**Softtek**

# LETTER FROM THE PRESIDENT

Since our foundation and to date we have built long-term relationships with each of our Stakeholders, mainly with our Softtekians, our shareholders and certainly with our customers. We have created and maintained a reputation that accompanies us in each of the challenges and objectives we set ourselves. We have managed to materialize each of the attributes that keep us in the IT industry by mentioning the name of Softtek. Consolidating ourselves as a global services company entails reaffirming our commitment to be and act as a company with high ethical standards and in which we are governed by fundamental values such as integrity, honesty and respect.

For this reason, 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. Let us be aware that each of our individual actions has an effect on everyone and that it is precisely there, in our strength as a group, where we will continue to find the way to continue transcending.

Sincerely,

Blanca Treviño



# 01. GUIDING PRINCIPLES

Morality refers to the way people act based on their point of view in relation to good or evil. On the other hand, ethics refers to the set of principles, rules or norms that govern the conduct of the person in any area of life seeking personal and collective benefit.

In this code we will focus on the last one, that is, 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. Therefore, since our creation we have been committed to developing our business in an integral, honest and impeccable way. We build trust by fully fulfilling what we promise, knowing that this commitment must be supported by the highest ethical standards.

By fostering an appropriate 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 doing our best work every day.



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.

From our Board of Directors to our Directors, Leaders, each of us who make up the Softtek community, we understand this responsibility and our actions are guided at all times by an ethical and upright spirit. This code is expected to be adhered to by anyone acting on behalf of Softtek.



**Integrity:** The quality of acting upright, honorably and impeccably without affecting our person, our environment, our personal objectives, or the objectives and interests of third parties.

**Respect:** Treat everyone with dignity, courtesy, kindness, consideration, and empathy, recognizing their opinions, rights, and freedoms.

**Honesty:** Respect for the truth, honor what is said. Offer what we can accomplish and strive to achieve it.

## 2. OUR COMMITMENT TO INTEGRITY

Building trust means not only keeping promises, but doing so on time, within legal and ethical boundaries. Everyone must know and follow this Code, comply with local and international laws, and adhere to Softtek's policies and guidelines.

Failure to comply may result in civil or criminal liability, and could even lead to termination of employment or professional relationship.

Our leaders have an additional responsibility, since, in addition to being models of integrity and impeccable conduct, they must help deter any potential act that puts the integrity of the company or people at risk, acting when requested and escalating, if necessary, any report that their people send them.

### OUR DAILY COMMITMENT

To know our [Cultural Platform](#) and, based on this, to behave according to our beliefs, pursue our purpose and guide us by our essence. Understand that each one of us is a representative of Softtek and that in every behavior and decision we make, we confirm and mold the type of company we are and want to be.

## OUR COMMITMENT AGAINST CORRUPTION

At Softtek we have and promote a culture of zero tolerance for corruption and/or fraudulent behavior.

It deserves special attention to comply with all matters 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 either internally or externally to obtain or maintain our business or obtain any other competitive advantage.

Gifts or invitations are not considered corrupt behaviors, as long as they are modest, usual in a business environment, not solicited. No cash gifts or any cash equivalents should be accepted.



**Bribery:** Offering or giving money or gifts with the intent to get something illicitly.

**Extortion:** Pressure exerted on someone through threats to force them to act in a certain way to obtain some benefit, whether economic, material or of any other nature.



Before considering giving or receiving any type of gifts, it is essential to follow the guidelines of our [Anti-Corruption and Anti-Bribery Policy](#). In addition, it is important to evaluate who we are going to offer it to, verifying if the recipient has restrictions or conflicts of interest that could affect our business relationship.

**Softtek**

### OUR COMMITMENT AGAINST MONOPOLY

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

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

For this reason, special attention is required to the laws regarding international business and antitrust, which if not complied with can damage the reputation of the organization and cause legal problems for both Softtek and our clients.

### Bribes and Blackmail

It is strictly forbidden to request, accept, offer, or give any kind of bribe, blackmail, or illegal benefit that violates fundamental human rights. Any situation or attempt at bribery or blackmail must be reported immediately.

### Money Laundering

At Softtek we are committed to complying with the legal provisions and regulations in the countries where we have operations regarding money laundering. That is why we only conduct transactions with clients and suppliers whose business activities are within the law and whose funds come from legitimate sources.

## CONFFLICT OF INTEREST

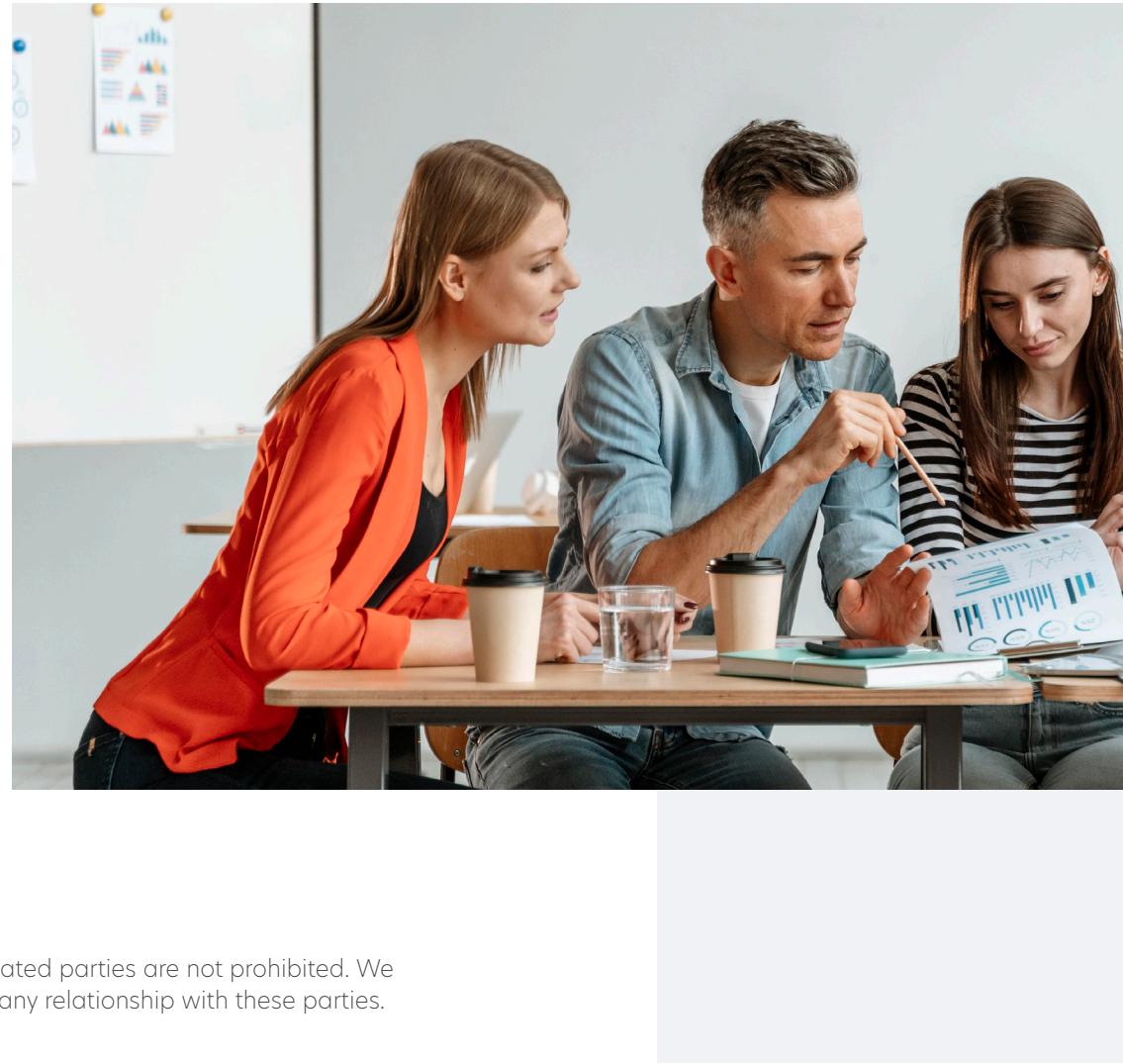
Doing business involves relating to other people and with multiple interests, so it is expected that our business decisions are based on the interests of Softtek and not on personal interests or to the detriment of the former.

Conflict of interest refers to situations where our own interests may influence the manner in which decisions are made by interfering, or to the detriment, of Softtek's interests. Therefore, you must act in the best interest of Softtek and exercise sound judgment, free of personal interests or divided loyalties, avoiding any conflict of interest. Likewise, those situations that encourage, create or may lead to, or be considered an imminent or potential risk between personal benefit and the interests of Softtek, must be identified in order to manage them appropriately.

At Softtek, business operations and professional relationships between related parties are not prohibited. We encourage transparency in properly identifying, declaring, and managing any relationship with these parties. Transparency helps us to guarantee an environment of integrity.

## RELATIONSHIP WITH SIGNIFICANT CUSTOMERS AND SUPPLIERS

Due to our essence and purpose, we seek to maintain long-term relationships with our customers and suppliers; in these cases a conflict of interest could be generated if we are more intimate than strictly professional with their employees.





#### OPERATION WITH RELATED PARTIES

These are those that are carried out between the person responsible for Softtek who authorizes, manages or receives the service or product and the entity or third party who offers it, and between them there is a patrimonial, family or couple relationship.

In all commercial operations, whether or not with related parties, the guidelines stipulated by the purchasing area must be followed and must be carried out at market prices.

Under no circumstances should you participate in or attempt to influence any business decisions or negotiations relating to Softtek that are detrimental to the interests of Softtek itself, or that may benefit or appear to benefit outside of logical business standards a family member, partner, or a business enterprise in which a family member or partner is involved or where there is a direct or indirect financial interest.

In any case, the protocol established in the [Conflict of Interest Policy](#) must be followed.

#### RELATIONSHIP BETWEEN EMPLOYEES WITH A REPORTING LINE OR WITH A RELATED PARTY

To avoid conflicts of interest, especially where there is a direct or indirect reporting relationship, we recommend keeping interactions strictly professional.

If a relationship could affect judgment or decisions, declare it according to the established process so it can be properly managed.

If you notice that a relationship of any kind could influence your judgment or decision-making and negatively impact Softtek's interests, you must inform your leader so the situation can be managed appropriately.

If at the time of joining Softtek or during the course of the professional activity a couple or family relationship develops between two collaborators and there is a direct or indirect hierarchical dependence between them, both must immediately declare this situation through the declaration of related parties following the protocol established in the Conflict of Interest Policy.

#### **INSIDER INFORMATION**

If you have access to privileged information in your role at Softtek—such as business opportunities or insights that could be seen as an unfair advantage—you must inform your leader.

You are not allowed to benefit from such information, nor to share it with related parties like family, close friends, or business partners.

#### **FINANCIAL INVESTMENTS**

Conflicts of interest can also arise from personal finances. To maintain high standards of ethics and integrity, avoid significant financial interests with Softtek clients, suppliers, or competitors, or with people you have family or financial ties to. If such a situation exists, declare it in writing using the Related Parties Declaration and seek the necessary support and advice to manage it appropriately.





## 3. INTEGRITY IN OUR RELATIONSHIPS

### FOSTERING A POSITIVE ENVIRONMENT

A positive work environment is built on respect, valuing diversity, and ensuring everyone in the Softtek community is free from discrimination, harassment, or bullying.

We must interact respectfully, recognizing and valuing each person's contributions, both within our teams and in all Softtek-related interactions.

### RESPECT BETWEEN US

Respect means treating people with dignity, courtesy, kindness, consideration, and empathy, recognizing their opinions, rights, and freedoms. Practicing respect means making an effort to understand preferences, viewpoints, feelings, behaviors, or decisions—even when you don't share them. Acting respectfully means behaving, deciding, and communicating in a professional and fair manner. It implies being honest, fair and professional in all our interactions, decisions and in the way we relate to each other.

Softtek is not allowed to exercise any conduct or comment that is intimidating, offensive, hostile or threatening in the treatment of any stakeholder group (employees, customers, shareholders, governments, competition or business partners). Any action that threatens the physical, emotional or psychological safety of these stakeholders is considered disrespectful, for example any type of discrimination, insult, humiliation, harassment or language of an offensive or derogatory nature towards others.

If you need to raise a concern or make a claim about disrespect or breach of agreement, follow the guidelines in this Code and do so professionally, supporting your case with evidence based on results, behaviors, or decisions.

This approach is essential for effective relationships and recognizes that everyone contributes to our business through their experience, knowledge, and perspective.

### OUR COMMITMENT TO HUMAN RIGHTS

We reaffirm our commitment to support and respect the protection of internationally recognized fundamental human rights within our sphere of influence. We adhere to the principles of the UN Global Compact, OECD Guidelines, and ILO conventions, which include:

- Freedom of association and collective bargaining
- Guaranteeing a safe and healthy work environment
- Eliminating all forms of forced labor
- Effectively abolishing child labor
- Eliminating discrimination in employment and occupation

Everyone at Softtek must have their human rights respected and guaranteed, and must never be forced to suffer any physical or psychological harm as a result of their work. We uphold the Universal Declaration of Human Rights.

### WE GUARANTEE A WORKPLACE FREE FROM HARASSMENT.

Decisions about people must never violate their fundamental human rights, and their integrity must always be protected. We do not tolerate discriminatory behavior, abuse of authority, harassment, or bullying of any kind—including sexual harassment.

Avoid jokes, insults, or comments that could be considered discriminatory or harassing, based on age, disability, gender, marital status, social class, race, religion, sexual preference or orientation, or any other condition. Harassment and bullying will be prevented, addressed, and sanctioned according to our [Anti-Harassment Policy](#).



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

At Softtek we are committed to generating an **appropriate environment**, where respect is rewarded. The type of conduct mentioned as not permitted in this Code is inappropriate and unacceptable.

If you believe any of these situations may arise, let the person know immediately and ask them to stop, referencing this Code. If possible, notify the relevant area leader.

If you require support, you can go to the People area.

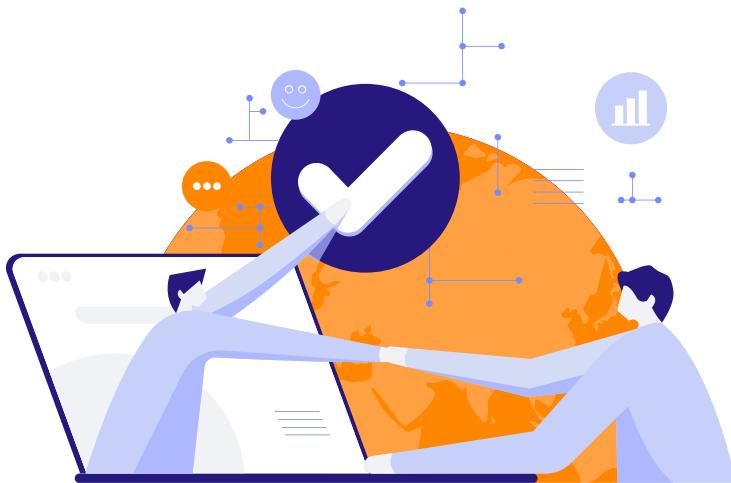
#### Some key aspects of how to treat to others with dignity and respect:

Listen carefully to others and value their opinions and perspectives. Be empathetic, understand and put yourself in the shoes of others by recognizing their feelings, needs and experiences.

Respect the privacy and confidentiality of individuals by avoiding disclosing or improperly using personal information without proper consent.

Refrain from any form of physical, verbal, or emotional violence toward others.

**Provide support, assistance, and collaboration when needed, fostering the well-being and personal growth of others.**



#### 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.

Discrimination implies any distinction, exclusion, restriction, preferential treatment, action or omission that is not objective and that results in impeding, nullifying or hindering the performance or opportunities offered by the company.

These opportunities could materialize through promotions, remuneration or allowances, among others.

We promote equal opportunity and comply with all applicable laws. Human rights are inherent to all people, without distinction; they are interrelated, interdependent, and indivisible.

#### 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 equality of treatment and opportunities.

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



## 4. INFORMATION INTEGRITY

### RELIABLE AND TRUTHFUL RECORDS

Information is one of the most valuable intangible assets we have. It allows us to make correct and timely decisions, for this reason, it is essential that we have a good understanding of the operational performance of our project, practice, client or area through the information we have available.

We therefore must generate truthful and timely information based on our role and responsibility. When we talk about information, we refer to, for example: hours reports, travel reports and associated expenses, financial reports, billing, forecasts, assignments, risk reports, etc.

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

### FINANCIAL COMMUNICATION AND INFORMATION

For certain positions and areas, it is essential to understand not only operational but also 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 comments on the company's performance and financial outlook to any external party should be made exclusively by a spokesperson authorized by the Executive Committee.

Therefore, no one other than an official spokesperson should make, on behalf of the company, any comments 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 submits to government agencies, authorities, and in other public communications that the company is required to report, must be truthful, complete, and accurate.

### **INFORMATION PROTECTION**

Due to our professional activity we have access to confidential, privileged or private information of our clients or even of Softtek itself. Such information may contain financial data, employee information, business strategies, proposals, budgets, technical information, or any other sensitive data.

Unauthorized access or disclosure may harm our customers or Softtek; For this reason, it is not permitted to access, use or disclose the information unless duly authorized to do so. Unauthorized access, use, or disclosure may also be a violation of laws. If in doubt about the sensitivity of the information and its disclosure, we suggest consulting with your Leader.

Remember that to ensure the protection of information, it is not allowed to access, duplicate, reproduce or make direct or indirect use of confidential or private information beyond what is necessary to perform your functions and responsibilities within Softtek or to store information of Softtek or its customers on private computers or devices or in other means not provided by Softtek.

If you become aware of any misuse or mistreatment of confidential information, please promptly notify your Leader or the Office of Information Security ([security@softtek.com](mailto:security@softtek.com)).



## 5. INTEGRITY IN THE USE OF COMPANY TECHNOLOGY AND ASSETS

The company's assets include physical assets, information and intellectual property. Softtek employees have a duty to protect the property of Softtek entrusted to them and to help protect the company's assets in general, even for a reasonable time once the employment relationship has ceased.

To do this, we must know and follow the corporate policies and procedures of Information Security, Physical Security as well as Personal Data Protection. We must ensure at all times that we follow the instructions regarding the handling of passwords and security codes that have been given to us.

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

It is our responsibility to preserve and maintain 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 it, any substantial damage, loss or risk of suffering any substantial damage, loss or risk of damage, from a Softtek property to the relevant department or your leader.

Any goods that have been provided to you to properly perform your functions, such as laptops, desktops, tablets, licenses, access cards, landlines or mobile phones, internet connection, among others, should be used primarily as support for the achievement of the company's objectives.

In the case of licenses and installation of software on equipment owned by Softtek, these must be authorized and carried out in accordance with the provisions of the internal protocols.

Invalid uses of such goods include processing, sending, extracting, accessing, displaying, storing, printing or disseminating material and information that is fraudulent, harassing, threatening, illegal, the product of piracy, sexually contained, obscene, intimidating, defamatory or in any case unrelated to upright and professional conduct, or contrary to applicable law.

Upon termination of your employment or professional relationship with Softtek, you must return all property provided to you, including documentation and any media containing proprietary or intellectual information of Softtek or any of its clients.

You may not use or disclose Softtek's or our customers' proprietary information unless authorized in writing.

### **PROPER USE OF SOCIAL MEDIA**

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

Our behavior must be upright, with respect and following the guidelines described in this Code.

It should be understood 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 the clients, services and products we offer must be maintained in any internal or external social media, as well as in social gatherings outside of work.





## 6. INTEGRITY IN SOCIETY

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

All of Softtek's social responsibility actions are achieved thanks to the implementation of the Sustainability Policy, which makes us commit to:

- To fully fulfill our purpose, that is, to generate value through technology for our customers, our people and our shareholders.
- Establish growth and annual expansion goals in accordance with our current resources.
- To be a strategic partner in technology for our customers.
- Promote the attraction, development and engagement of our human talent. To contribute to the quality of life of our employees.
- To generate circles of well-being in each headquarters where we carry out our professional activity.
- In the purchase of products and services, demand that the social and environmental aspects involved in the production, transportation and use of the same, not only comply with current legislation but are within the legal, ethical standards.
- To contribute to the sustainable development of the environment in which we operate. For this reason, we will invest in local companies and in the people who live and work in the area.

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

### **ENVIRONMENT**

Our commitment to the community means that we must strive to minimize any adverse effects 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 responsible citizenship. Among the main areas to provide support are, for example: education, social welfare, disaster relief, among others.

Before making any charitable contributions 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 legally constituted organization that complies with its tax obligations.

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





## 7. INTEGRITY IN ACTION

### DECISION-MAKING

Integrity is everyone's responsibility at Softtek. We must strive to ensure our daily ethical decisions align with this Code and our core values. While this Code covers many situations, sometimes doing the right thing may not be clear.

To help, we encourage everyone to reflect and answer these questions before making a decision:

1. Am I basing my decision on verified and objective information?  
Act on facts, not rumors or incomplete information.
2. Have I explored all possible solutions?  
Seek creative options that benefit people and the environment.
3. Am I making a decision that generates the greatest good?  
Consider who may be impacted and how.
4. How would I feel if this decision was made public to my family, friends, or leaders?  
Evaluate whether this action reflects who you are and how you want to be seen.
5. Do my actions fulfill the spirit—not just the letter—of Softtek's policies, laws, or codes? Complying with applicable policies, laws, or codes is the starting point, not the final destination. True integrity means our actions reflect the intent behind the rules, not just compliance.

To learn more about and put into practice this code of ethics, we invite you to participate in the trainings available on our internal platform. These programs address not only the issues found in this code, but related policies and processes.

**Softtek**

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

Remember that when in doubt, we can always reach out to our leader, the corresponding area, the People department, a member of the Ethics Committee, or send an email to [integrity@softtek.com](mailto: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, regarding any behavior that may harm or jeopardize our integrity or that of someone else at Softtek, whether it is a violation of the Code of Ethics or any policy or procedure.

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](#).

Furthermore, we encourage you, though it's not mandatory, to have a direct conversation with the person concerned, your leader, or a representative from the People department. If, for any reason, the individual doesn't address the matter appropriately, if your leader or the People department fails to offer sufficient assistance, or if the situation becomes exceptionally urgent, you have the option to submit a report at any time.

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, protection of the complainant and confidentiality of information.



Our core values of Openness, Trust, and Mutual Respect guide us to engage in conversations with our leader, the People department, or even the individual directly involved in addressing any possible breaches of the Code of Ethics. If, after these discussions, you find that no meaningful changes or improvements have occurred, or if the situation is exceptionally serious, please be aware that you have the option to file a report at any time. This report can be made anonymously if you prefer, and it will be followed up by the appropriate Local Committee. <https://integrity.softtek.com/report>.

**SPEAK UP**  
**#beupright**

