



Anticorruption Policy

[Integrity.softtek.com](https://integrity.softtek.com)

July 2025



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1. Objective

Corporate Values Softtek, S.A. de CV, its parent, affiliates and/or subsidiaries ("Softtek") is a company committed to providing information technology services with the highest standards of quality, professionalism and responsibility, as well as the prudent practices that prevail in the technology industry. Meanwhile, Softtek prides itself on its reputation, impartiality and honesty in all business, labor and intercompany relationships.

Softtek is committed to preventing, addressing and sanctioning corrupt behavior among members of the Softtek community, both internal and external, to guarantee that the development of our activities in front of our clients, suppliers, collaborators and shareholders is attached to legal framework and good commercial practices, favoring free competition and the opportunity to carry out business in the countries where we operate.

2. Scope

The present policy is of global reach, and applies to the employees, service providers and Talent Partners, trainees, and shareholders,

with special emphasis on the directors and managers or any person who carries out or intervenes in procedures before government officials, to the contracts and negotiations that they carry out on behalf of Softtek.

Employees shall conduct their actions under the principles of our Cultural Platform and the values described in the Code of Ethics: integrity, honesty, and respect. These principles may be consulted at <https://integrity.softtek.com/>.

In addition, they must comply with the applicable local legislation(s) in the country in question or, if applicable, with the Foreign Corrupt Practices Act ("FCPA") of the United States of America and the United Kingdom Bribery Act ("UKBA"). In the case of Mexico, the General Law of Administrative Responsibilities ("Ley General de Responsabilidades Administrativas") must be complied with. Its interpretation, criteria, regulations, and opinions of national and international organizations on anti-corruption practices may be considered.

The observation of this document shall not limit in any aspect the exercise of civil, criminal or administrative actions by Softtek.

3. Responsibilities

It is Softtek' s responsibility to comply with this policy by:

- Complying with the procedures and controls established in the Anti-Corruption and Anti-Bribery Management System.
- Communicating improvement proposals for its respective Management System.
- Reporting, through the Integrity platform (<https://integrity.softtek.com/>) any improper practice that compromises compliance with this policy.
- Performing due diligence of all transactions or events that are under its responsibility to supervise or operate.

The person(s) in the role of Anti-Bribery Compliance Function act independently from operational activities and have the necessary authority and independence to oversee the implementation, maintenance, and continual improvement of the Anti-Bribery Management System. This role is responsible for communicating

to top management, or through the whistleblowing line, any concerns related to compliance with this policy or bribery risks.

4. Definitions

This document is the main reference for Softtek's image designing and positioning in the market; it was planned to satisfy the needs of the countries where we are present: Argentina, Brazil, Canada, Chile, China, Colombia, Costa Rica, Hungary, India, Mexico, Netherlands, Paraguay, Peru, Puerto Rico, Uruguay, United Kingdom, Spain, USA and Venezuela.

You may include tables, with the following style recommended:

For the proper interpretation of this policy, and in the event of any written communication related to this policy or in the event of a dispute, the following terms, whether in the plural or singular, shall have the following definitions:

- a) **Anti-Bribery Compliance Function:** Individuals with the responsibility and authority for the operation of the Anti-Bribery Management System. They must be independent from the processes that are part of the Anti-Bribery Management System.
- b) **Bribery:** The action of giving money or gifts to someone, whether an individual or a legal entity, public or private, to obtain something, specifically a commercial advantage or any other type of advantage, in an illicit manner.
- c) **Client:** Any third party or party related to Valores Corporativos Softtek, S.A. de C.V. to whom Valores Corporativos Softtek, S.A. de C.V. is rendering any service through a contract or with whom it is in negotiations for such purpose.
- d) **Committee:** Softtek's Global and Local Ethics Committee.
- e) **Code of Ethics:** Softtek's Code of Ethics.
- f) **Corruption:** Corruption is the offer or promise to a public official or private sector individuals in any country or locality, directly or indirectly, to give or receive any undue advantage or consideration individually or collectively, to obtain business or have a public official, omit or delay an act of office and which is not necessarily punishable by the law of the place in question.
- g) **Complaint:** Manifestation of allegedly irregular facts, by means of which the complainant expresses in writing the participants and the conducts of corruption committed in which members of the Softtek community are involved.
- h) **Donations or Charitable Contribution:** Any contribution of money or equivalent made for non-profit purposes. In general, refers to support for specific purposes such as education, social welfare, disaster relief, among others.
- i) **Employee:** A person who acts as an employee, service provider and Talent Partner or leader in legal or moral representation of Softtek.
- j) **Government Official:** Means, but is not limited to, any person who: (i) occupies a legislative, executive, administrative or judicial position; who (ii) provides a service of a public nature or within the public function as an employee or on behalf of a government official, whether elected or not, at any level, federal, state or local; or (iii) is a candidate for political office or a person who holds a significant position or decision-making power in a political institution or party.
- k) **HRA:** Human Resources Administration Department of Softtek, depending on the location of the employee.
- l) **Interested party:** A person who, appearing to act on his/her own behalf, intervenes in a legal act on behalf of and for the benefit of another.

- m) **Policy:** This Anti-Corruption and Anti-Bribery Policy.
- n) **Shareholders:** Individuals or legal entities that have decision-making capacity or patrimonial rights over Valores Corporativos Softtek, S.A. de C.V., its parent company, affiliates or subsidiaries.
- o) **Softtek:** It is understood as Valores Corporativos Softtek, S.A. de C.V., its parent company, affiliates or subsidiaries.
- p) **Supplier:** Any third party or party related to Softtek that supplies goods or provides any service in favor of Valores Corporativos Softtek, S.A. de C.V.

5. Guidelines

5.1. Zero Tolerance Bribery

Employees shall not make, authorize, accept, or solicit bribes or acts of corruption, whether for personal or collective benefit, to a Government Official(s), Director(s), Manager(s) or any person who influences or may influence the business decision making of any customer or prospective customer, or any supplier or prospective supplier of Softtek.

5.2. Accepted practices.

A conduct is not considered corruption or bribery when payments or gifts, whether in cash or equivalent, comply with the following requirements:

- d) They comply with the applicable laws in each jurisdiction where we operate and the Code of Ethics, Softtek's internal policies and regulations.
- d) Have a verifiable purpose and are appropriate.
- d) Should not be granted frequently or on an ongoing basis.
- d) The payments or gifts offered by Softtek must be registered in the financial information system without alteration of concepts, specifying the amount (the market value and how it was acquired), the person or persons who give and receive it, as well as the reason. For such purposes, the leader(s) authorizing it must be clearly stated.

5.3. Gifts

Employees shall not suggest receiving or giving gifts as a consequence of their professional practice in Softtek. If they do exist, they must be spontaneous and always comply with the requirements described in the previous paragraph so that it cannot be interpreted as an undue payment in exchange for the granting of contracts or an undue concession during a negotiation process. When this situation arises, in no case should they influence, or generate the expectation that they will influence, the decision-making process.

5.4. Promotional Material

The delivery of promotional materials, as well as gifts, must be modest, spontaneous and comply with the requirements described in this policy. These materials must have the commercial name to which they promote, and their exchange must be strictly promotional. In this situation, in no case should they influence, or generate the expectation that they will influence, the decision-making process.

5.5. Entertainment, marketing, or dining events outside of the office

Invitations or attendance at entertainment or marketing events, which may or may not include travel, as well as meals outside the office, are permitted when they occur within the framework of the law, represent business or promotional opportunities whose purpose is to create, strengthen or expand the relationship with customers or suppliers, for example: A Summit for the launch of products or networking with customers/suppliers/allies.

It must be spontaneous, comply with the business objective and adhere to the requirements described in the section on accepted practices. Acceptance of such invitations shall in no case influence, or create the expectation that they will influence, the decision-making process.

The use of corporate cards, as well as personal or institutional resources, to cover expenses related to events of this nature in dealings with public officials is prohibited.

5.6. Trips

Travel, trips, and related expenses paid by Softtek to non-employees shall have a justified business purpose and align with Softtek's purchasing and [travel policy](#). Examples include, but are not limited to: training, conferences, seminars, audits, work meetings and site visits. If they exist, they must be objectively related to the business and/or commercial activity and adhere to the requirements described in the section on accepted practices.

5.7. Contributions (donations)

In Softtek we believe that contributions and donations to non-profit organizations are part of our commitment to build a corporate citizenship, therefore donations can be made, which must be in accordance with the present policy and its guidelines. Examples of such donations include, but are not limited to, institutions related to education, social welfare, disaster relief and research projects. All Rights

Before making any charitable contribution or donation on behalf of Softtek, we must ensure that it complies with applicable laws in the countries where we operate. The recipient must be legally constituted as a non-profit organization, in good standing with its tax obligations and de facto materializing its social action.

Such contributions or donations must not be acts of corruption or bribery, whether for personal or collective benefit. Nor shall they be made to cover up any act of corruption or bribery. Any contribution or donation made shall be truthful and reliably reflected in Softtek's records.

5.8. Use of interested or third parties.

External managers, consultants, or any other external representatives acting on behalf of Softtek are prohibited from making bribe payments on behalf of Softtek. This prohibition also applies to service providers and Talent Partners hired by third parties to perform work on Softtek's behalf.

Any and all third parties who will interact with Government Official(s) or government entities on behalf of Softtek must complete the process of documenting in detail the work to be performed by the means provided by Softtek prior to commencing work on behalf of the group.

5.9. Hiring or involving government officials

It is not permitted to hire or involve a government official or their immediate family member to unduly influence the official, or in exchange for any unfair favor or benefit.

5.10. Relationships with public officials and politically exposed individuals.

Interaction with government entities, public officials and state-owned companies must be carried out in accordance with the legal framework in effect in each country and with the highest ethical standards for the achievement of business objectives.

5.11. Political contributions

It is not permitted to make a political contribution to improperly influence a government official, or in exchange for any undue favor or benefit.

6. Reporting of corruption behavior and/or bribery

It is the employees' responsibility to denounce within Softtek's spheres of action any act of corruption or

bribery, or that could be interpreted as such. Important practices to follow include:

- a) Make a detailed description, as precise as possible, of the facts, acts or incidents that give rise to corrupt behavior. Include possible witnesses who may have witnessed the alleged corrupt or bribery conduct, as well as any information considered relevant.
- b) Have it in writing or in an electronic format and signed, if applicable:
 1. When submitted electronically, it shall be through the Integrity Softtek website located at the following link: <https://integrity.softtek.com/>
 2. When submitted via e-mail integrity@softtek.com who in turn will forward it to the corresponding Ethics Committee.
- c) Submit all evidence known and accessible, as long as it is permitted by law and refers to the points in question. In no case shall evidence contrary to law, on uncontroversial facts, or extraneous to the procedure be admitted.

Once the complaint has been received and the recommendations of the previous paragraphs have been attended to, the described process and deadlines defined in the integrity line, including when the complaint is delivered to the corresponding area of Softtek.

Softtek will not tolerate any form of discrimination or retaliation for reporting in good faith alleged violations of the Code of Ethics. Each report received will be subject to an objective investigation based on the presumption of innocence of the accused, protection of the whistleblower, and confidentiality of the information.

The ethics committees are responsible for the anti-corruption and anti-bribery within Softtek, which will independently monitor the adequate compliance of its Management System.

In the event that any employee, service provider, Talent Partner, trainee or any shareholder does not comply with the present policy, sanctions may be imposed in accordance with the guidelines established in Softtek's Code of Ethics, and those of diverse applicable legal dispositions, which may be (in an enunciative and non-limiting manner) with the termination of the individual's work contract for causes attributable to the employee and administrative sanctions; corporate; labor; as well as the presentation of criminal complaints in the possible event of a crime.

7. Linked documents

[Code of Ethics](#)

[Fault Typification](#)