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LETTER FROM THE PRESIDENT

For us, living by our essence, beliefs and values is both a way to work and a lifestyle. Since we were founded, we made a commitment to use integrity every single day inside and outside Softtek, and I’d dare to say that transparency, honesty, and respect are and will always be present in every conversation, behavior and intention.

This Code of Ethics will be a guide we can use to ensure that our professional conduct keeps using integrity as a core value. We are certain that using this code will allow is to protect our organization and the interests that shareholders, collaborators, subcontractors, and clients have placed on us.

I know that I can count on you to follow this Code and that you will always keep in mind that our reputation is in your hands. Let us continue transcending in the IT market and consolidate our corporate social responsibility by searching for the best for us and for our clients.

Sincerely,
Blanca Treviño
01 GUIDING PRINCIPLES

We are convinced that integrity, honesty and respect are not only desired values, but also essential characteristics that we must have in order to transcend and impact the business world. Since we were founded, we made a commitment to do business with integrity and honesty and we build trust by fulfilling our promises with the highest ethical standards.

We promote a diverse and inclusive environment that respects fundamental human rights and guarantees that everyone is treated with dignity and equality so that talented and determined people can create wonderful things with excellence. Everyone strives for excellence and always strive to create better things.

In order to achieve this goal, we must be aware that Softtek’s reputation is in our hands and that our actions and decisions will reflect that. Our Board of Directors, Executives, Leaders and the members of the Softtek community understand this responsibility behind it and all our their actions will always be done taking integrity and morals into consideration.

INTEGRITY LINE

We encourage the Softtek Community, our providers, clients and other associates related to the company to report any behavior that breaks or could break the law or this Code to their Leaders, contacts in Softtek or through our Integrity Line.

Allowing or tolerating these behaviors as well as avoiding or dismissing the reports turns us into accomplices. It’s important that we report these behaviors though the Integrity Line.

Softtek will not discriminate or retaliate against those who inform in good faith about alleged infractions to the Code of Ethics.

An objective investigation will be performed for every report received. The investigation will be performed assuming the alleged innocence of the accused and protecting the informant.
02

OUR COMMITMENT WITH INTEGRITY

In order to build trust we must fulfill our promises with integrity and honesty as well as abiding by the law, which is why everyone must follow this Code and abide by the applicable local and international laws and with Softtek’s policies and guidelines. Failure to comply with the abovementioned distances us away from our essence and objective, which could lead to a civil and/or criminal liability for the offender that could also lead to the termination of their employment or professional relationship.

Our Leaders must be role models for an integrity-based behavior and deter any action that could risk the company’s integrity or the integrity of others when they are asked to as well as escalate any received reports.

Certain exceptions to this Code of Ethics can be permitted in special cases under extraordinary circumstances that should be previously authorized by the Ethics Committee and discussed and authorized by a member of the Executive Board.

OUR DAILY COMMITMENT

We must act according to our beliefs and essence as well as pursue our objectives based on our Cultural Platform. We must understand that we are Softtek’s representatives and that our behavior and decisions confirm and shape the type of company that we are and that we want to be.

We must promote diversity and inclusion, act with integrity and honesty, and report any behavior that breaks this Code.

We must respect the company’s guiding principles as well as the human rights stated in local laws, international treaties and universal declarations of human rights.

All Softtek collaborators must be respected and guaranteed their human rights. A collaborator can never be forced to ensure any sort of physical or psychological grievance because of their job.

A collaborator can’t be discriminated against because of their race, gender, sexual orientation, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnicity, social status, disability, wage, or trade union membership.
Beliefs

- Given the right environment, talented and self-determined people create amazing things.
- Collaboration is the only way to fulfill our purpose.
- By being agile and mastering technology we stay one step ahead.
- We build trust by relentlessly doing as we say.

Purpose

Create value through technology for our clients, our people and our shareholders.

Essence

A hard-to-explain passion for reaching new frontiers, to aim higher, to leave a mark; to transcend.
We will abide by all applicable laws and regulations. We must look for adequate advice about the legal requirements and other important aspects with our direct Leader, the Local or Global Ethics Committee or with someone that we deem convenient. We must grant special attention to international business laws as well as anti-monopoly and anti-competition laws that could harm the organization's reputation and could cause legal problems for Softtek and its clients if we don’t abide by them.

2.1.1 GIFTS
Small gifts can be offered and accepted only if they are unsolicited, are not made in cash or its equivalent, are allowed by law and are common in business environments. Gifts cannot be given with the intention of influencing a third party or the professional judgment about the execution of our job.

2.1.2 BRIBES AND BLACKMAIL
It’s strictly forbidden to ask, accept or offer a bribe, blackmail or any other illegal benefit that’s against fundamental human rights. You must immediately report any of these offers, proposed arrangement or apparent arrangements made through bribes or blackmail.

OUR COMMITMENT AGAINST MONOPOLY

Behaving with integrity, respect and honesty means avoiding any fraudulent behavior or any behavior in general that could be interpreted as such and abiding by anti-corruption laws applicable in countries where Softtek has operations or offices. We will steer away from corruption by not accepting or offering, directly or indirectly, any type of payment, gift or gratification to or from an internal or external party in order to obtain or maintain our business with them or to obtain any other competitive advantage.

Our commitment against monopoly

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OUR COMMITMENT AGAINST CORRUPTION

Behaving with integrity, respect and honesty means avoiding any fraudulent behavior or any behavior in general that could be interpreted as such and abiding by anti-corruption laws applicable in countries where Softtek has operations or offices. We will steer away from corruption by not accepting or offering, directly or indirectly, any type of payment, gift or gratification to or from an internal or external party in order to obtain or maintain our business with them or to obtain any other competitive advantage.
CONFLICT OF INTEREST

Part of doing business implies getting acquainted with other people and with multiple interests. Our business decisions should be based on the best interests for Softtek and not on personal interests or relationships.

A conflict of interest is a situation where our own interests, including double bind relationships, could influence and interfere with Softtek’s interests. We must avoid any situation in which our personal interests are or could be in conflict with the company’s interests.

3.1.1 RELATIONS WITH SIGNIFICANT CLIENTS
Our essence and objectives make us strive to keep long term relationships with our clients. A conflict of interest could arise if we get closer than what it’s strictly professional with our client’s employees, so we suggest avoiding it. You must inform your leader if this happens to avoid any conflict of interest.

3.1.2 OPERATING WITH RELATED PARTIES
They take place between a Softtek collaborator and a natural or legal person that has a financial, familiar and/or professional relation with them. Softtek doesn’t prohibit relationships between related parties since they can’t create conflicts of interest by themselves. However, we suggest avoiding them as they could lead to favoritism or could be interpreted as such.

If a business operations with related parties exists (i.e. buying goods or services from a business that belongs to a relative). Softtek’s benefits should be evidenced with similar options that aren’t owned by a related party.

This means that two additional quotes must be presented from companies that don’t involve a related party.

3.1.3 RELATIONS BETWEEN COLLABORATORS AND THEIR REPORTING LINE OR WITH A RELATED PARTY
We suggest that collaborators don’t get acquainted beyond a strictly professional context with their direct or indirect employees to avoid damaging relationship and possible conflicts of interest that could generate a threatening environment or an environment where one person hopes to obtain a benefit.

It’s also recommended that you avoid labor relationships or professional ones with direct employees with related parties.

In case the abovementioned happens, it must be reported on writing and periodically supervised by a higher level in a hierarchy at least on the most critical decisions including, without being limited to, raises, promotions or permits to ensure transparency and to avoid any type of conflict of interest.
3.1.4 DOUBLE BREASTED LABOR OR PROFESSIONAL RELATIONS

Softtek will only allow relationships that don't interfere with Softtek's direct interests or that allow a collaborator to perform 100% of their responsibilities in the organization. A leader will be involved in the situation since it is difficult to determine if the complementary offer will interfere with the collaborator's responsibilities in Softtek, and said leader will be able to ask the Local Ethics Committee to intervene as well.

Avoid any possible conflict of interest by not accepting work from any IT (Information Technology) company or from Softtek's providers, contractors, client agents or competitors.

3.1.5 PRIVILEGED INFORMATION

You must inform your leader if you have access to privilege information that represents a tacit or implied business opportunity that could be interpreted as an unfair advantage. We can't obtain a direct or indirect benefit from said information. Indirect benefits include related party benefits (relatives or business partners).

3.1.6 PRIVILEGED INFORMATION

Another important type of conflict of interest is the one related to our personal finances. In order to keep the highest ethics and integrity standards we suggest avoiding significant financial interests with Softtek's clients, providers or competitors. If you have a financial interest, you must inform your leader about it in writing as soon as possible and ask for the proper support and advice to manage it.

PROMOTING AN ADEQUATE ENVIRONMENT

We believe in a respectful work environment where diversity is valued and no one is discriminated, intimidated, harassed or sexually harassed. In order to promote this type of environment we must treat each other and the people we contact in Softtek's name with respect and value their contributions.

3.2.1 MUTUAL RESPECT

Being respectful means treating people with dignity, making an effort to understand them, and empathizing with their points of view and feelings.

This involves acting with integrity and speaking to each other with respect. You should avoid the use of insults, threats or intimidations when talking with our interest groups (collaborators, clients, stockholders, governments, competitors or business partners).

3.2.2 RESPECTING HUMAN RIGHTS

Our decisions shall never infringe upon people's fundamental human rights and they must always protect people's integrity. We must also promote equal opportunities and abide by all the applicable laws.

We cannot tolerate discrimination, abuse of authority, and harassment of any kind including sexual harassment.

We have to avoid pranks, insults or any other comments about a particular condition, age, disability, gender, marital status, ethnicity, religion, sexual preference or orientation, or anything that could be considered discrimination or harassment.

Harassment should be prevented, attended to and sanctioned according to the Anti-Harassment Policy.
ACCURATE AND RELIABLE RECORDS

Information is one of the most valued intangible goods because it allows us to make appropriate and timely decisions. Because of this, it’s very important that we understand the operational performance of our project, practice, client or area.

We have to make appropriate and accurate reports according to our roles and responsibilities. Reports refer to but are not limited to: hour reports, trips and associated expenses reports, financial reports, billing reports, expectation reports, assignation reports, risk reports, etc.

We have to be certain that our records are up to date and contain reliable and accurate information that abides by the legal requirements and that reflects at the truth, which means that our records reflect things as they are and not as what we want them to be. To this end, it’s important that we follow our policies, procedures and internal controls.

COMMUNICATION AND FINANCIAL INFORMATION

It’s important that certain positions and areas understand the operational and financial structure of the company so that they can have a better understanding of the business and have a strong foundation to make decisions. This financial knowledge must go hand in hand with the financial disclosure policies, financial proceedings, and legal requirements.

Only a spokesman that has been authorized by the Executive Board can talk with an external party about the performance and financial perspectives of the company.

No one besides the official spokesman can make any comments about Softtek to the media on behalf of the company about its businesses, plans or financial situation, investors, analysts, external consultants or through chats and cyber blogs or in any other public forum without consent from the Executive Board.

The collaborators that produce financial reports must deliver complete, accurate, precise, periodic and comprehensible information through the statements and documents that Softtek presents to government agencies, authorities and other public releases that the company must report to.
PROTECTING INFORMATION

Our professional activities give us access to confidential, privileged or private information about our clients and about Softtek. Said information can contain financial data, employee data, business strategies, proposals, budgets, technical information or any other type of sensible data.

It’s strictly forbidden to divulge or access said information without authorization. Failure to do so could damage Softtek or our clients and break the law. We suggest consulting your leader if you have any doubts about the sensitive nature of the information and its divulgence.

It’s strictly forbidden to access, duplicate, reproduce or use the private domain information directly or indirectly for other purposes besides doing your job in order to protect the information. It’s also forbidden to store information about Softtek or its clients in private computers and devices and in other devices that weren’t provided by Softtek.

Report immediate any incorrect usage or treatment of confidential information to your Leader or to the Information Security Office (security@softtek.com)
USE OF TECHNOLOGY AND COMPANY PROPERTY INTEGRITY

The company has physical goods, information and intellectual property. Softtek’s collaborators have to protect the property that they have been trusted with and also protect the company’s goods.

In order to do that, you must know and follow the Information Security, Physical Security and Personal Data Protection Corporate policies and procedures. Make sure that you also follow at all times the instructions about password handling and the security codes that had been entrusted to you.

We must preserve and maintain our facilities in a good condition or report any misuse. Our facilities are drug-free and illegal-substance free environments. You must be alert and inform about any loss or risk of loss or Softtek’s property to the security department or your line manager as soon as you know of it.

Intellectual property refers to software, technical information or any other artifact developed in Softtek’s facilities, with our client’s Softtek tools, or those made in Softtek under a labor or professional relationship. Said intellectual property must be treated with the appropriate care and must be transferred or surrendered to Softtek or its clients unless there is a previously agreed exception.

Any laptops, desktops, tablets, licenses, access cards, landline or mobile phones, internet connection, and other goods that were provided to you to perform your duties must be mainly used to achieve the company’s goals.

It’s strictly forbidden to use these goods to: process, send, extract, access, visualize, store, print or distribute fraudulent, hostile, threatening, illegal, sexual, obscene, intimidating, and defamatory information that isn’t treated with integrity and professionalism or that doesn’t follow the applicable laws.

When you terminate your business or professional relationship with Softtek, you must return all the articles provided by Softtek including documents and any other artifacts containing information about Softtek’s private or intellectual property or about any of its clients.

It’s forbidden to use or distribute Softtek’s private information or the client’s information unless you have written permission to do so.
ADDECUATE USE OF SOCIAL MEDIA

OReputation is one of the most valuable goods of a company. Here we include the adequate use of technology in internal and external social media. We must behave with integrity and respect and follow the guidelines described in this Code.

Comments made through social media can reach a wider audience. Because of this, it’s important that we maintain our client's confidentiality and the services and products that we offer away from social media and meetings outside working hours.
INTEGRITY IN SOCIETY

Corporate social responsibility is a process of value creation where we continually look for an optimal balance between people, the environment and prosperity. This means that we have to make business decisions that take into consideration the consequences that could impact our people, clients, communities and the environment where we work. Our principles are included, among others, in the ISO 26000 guide.

Softtek’s social responsibility is achieved through the establishment of the Sustainable Policy in which we agreed to:

- Fulfill our objectives and create value through technology for our clients, our people and our stockholders.
- Establish growth and annual expansion goals according to our current resources.
- Be a strategic technology associate for our clients.
- Promote attraction, development and engagement of our human talent.
- Contribute to the quality of life of our collaborators.
- Generate wellness circles in the headquarters where we carry on professional activities.
- Buy products and services where the social and environmental aspects involved in the production, transportation, and use of said products complies with the current legislations and also has ethical standards and integrity.
- Contribute to the sustainable development of the environment in which we operate. We will invest in local businesses and in people that live and work in the zone.

Softtek should always be associated with quality, efficiency, integrity and respect for human rights with fair and safe work conditions and a respectful business practice with the environment.
GLOSSARY

Ethics: Set of moral principles that regulate a person's behavior in any aspect of their life.

Moral: Belonging to or related to a person's actions and if act in a righteous way or not.

Fraud: Action that lacks truth and righteousness and that harms the person that is committed against.

Human Rights: Basic rights that include, among others, freedom of speech, privacy, health, life, liberty and security as well as an adequate living standard. These are inherited in all people.

Integrity: Quality of acting in a righteous and impeccable way that doesn't affect ourselves, our personal objectives, or other's objectives.

Conflict of interest: Situation in which the interests of a collaborator interfere with the company's interests.

Respect: Treating people with dignity and making an effort to understand and emphasize with other's points of view and feelings.

Bribe: Give money or gifts to someone to get something illegally.

Blackmail: Threatening someone to make them act in a certain way in order to obtain money or another benefit.

Related party: A financial (stockholder, associate or partner), familiar (through blood or affinity) or professional relation (advisor, employee, directive or hired professional) between a collaborator and the natural or legal person with whom they make a commercial transaction or establish a work or professional relation.

Honesty: Regarding the truth. Offering what we can achieve and making an effort to do it.

Excellence: With a superior quality that makes it worthy of merit and respect.

Dignity: From Latin dignitas. Worthy. It can also indicate that someone deserves something. Dignity is related to excellence, seriousness and decorum of someone regarding the way they act. Having dignity means acting in an honorable way taking into consideration morals and ethics.

Decorum: Honor, respect, reverence that should be given to someone.