



Environmental, Social and Governance (ESG) Report 2023

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I. Introduction

1. About Cybolt

Cybolt Inc. is a cybersecurity service provider that offers comprehensive, precise, and holistic solutions. Our operational centers are located in Mexico (Mexico City and Monterrey), Colombia (Bogota), and the United States of America (Chicago and Miami). Our mission is to protect our clients from cyberattacks, data theft, misuse of information, malicious emails, hackers and other threats. We work to prevent critical incidents and to offer immediate and reliable solutions, in order to facilitate data recovery and restore business operations in emergency situations. We serve clients from both the public and private sectors to mitigate security risks linked to infrastructure, devices, identity theft, information management, and other technological resources.



2. Letter from **the Chairman of the Board**

To our clients, investors, collaborators, business partners, and other key stakeholders:

I am pleased to present Cybolt's Environmental, Social, and Governance (ESG) Annual Report for 2023. As Chairman of the Board, it is both an honor and a responsibility to share with you our progress in aligning our corporate strategy with sustainability and ethical governance.

In today's ever-evolving business landscape, the interplay between corporate success and social well-being is more evident than ever. As a leading cybersecurity company, we recognize the integral role we play in safeguarding digital ecosystems, protecting privacy, and strengthening trust, particularly at a time when personal and financial data, both of individuals and organizations, are increasingly exposed to considerable risks.

Cybersecurity should be a priority for businesses and public institutions as we move towards an increasingly digitized society. Cybersecurity firms must be prepared to uphold the rights of individuals, ensuring the secure flow of information and upholding information integrity.

Our commitment to human rights and ethical business shapes our identity, influences our decisions, and propels our mission forward. By integrating sustainability into our business practices, we aim to enhance the company's long-term value for shareholders and contribute positively to the world.

I would like to express my gratitude to our dedicated employees, visionary leadership team, and supportive stakeholders for their commitment to the success of our ESG initiatives. Thank you for your trust in Cybolt, and for supporting our journey of responsible growth and innovation.

Sincerely,



A handwritten signature in black ink, appearing to be 'M. Rioseco'.

Mauricio Rioseco
Chairman of the Board

3. 2023 ESG highlights

During 2023, we drove various initiatives to address Environmental, Social, and Governance (ESG) issues, among which the following milestones stand out:

- Cybolt obtained ISO 37001 certification in anti-bribery management and completed an assessment of compliance with ISO 26000 (Corporate Social Responsibility).
- We conducted a preliminary assessment of the carbon footprint of our Technological Operations Center, which houses the Data Center.
- 75% of staff (209 people) received training on the UN Guiding Principles on Business and Human Rights and its relevance to Cybolt's work.
- 36% of staff (more than 100) participated in gender & equality trainings.
- 100% of cases received through our grievance mechanism were adequately resolved.
- Staff members participated in two key conferences: Women in Tech and RightsCon.
- For the first time, the Human Rights Policy was applied in a case to terminate a relationship with a business partner due to credible reports of corporate behavior incompatible with our values.



Staff Development

In 2023, Cybolt promoted the awareness and integration of ESG principles and best practices into our work through comprehensive training initiatives. As part of our commitment to fostering a culture of responsibility, we launched the ESG Ambassadors Program. Each business unit appointed dedicated ambassadors, who will oversee the proper implementation of cross-cutting initiatives addressing ESG issues and lead awareness campaigns across various organizational channels.



Adherence to international standards and best practices

In 2023, Cybolt made significant strides in strengthening its commitment to responsible corporate practices and transparency. We made significant progress by complying with ISO 37001 and progressing in ISO 26000 indicators, underscoring our dedication to meeting international standards of social responsibility and anti-corruption. Furthermore, to enhance transparency and accountability, we launched the Compliance Portal, a platform dedicated to monitoring grievances that enables employees and any external third parties to report concerns securely and confidentially.





Environmental Action

Environmental responsibility remained a priority in 2023. We conducted a preliminary assessment of our carbon footprint, with an emphasis on our physical infrastructure.



Diversity and Inclusion

Cybolt's commitment to improving on diversity, equity, and inclusion (DEI) was further reinforced in 2023. Cybolt remained among the list of 'Super Companies' of Grupo Expansion 2023 for the third consecutive year, standing out as the only company listed within the cybersecurity sector. We are also proud to announce our inclusion in the Super Companies Ranking for Women 2023, ranking number 96 out of 140 in the category of companies with fewer than 500 employees. Cybolt was showcased for its practices aimed at promoting and retaining female talent.

A year in numbers

2 ISO certifications
37001 & 26000

100% of cases
effectively resolved through
the grievance mechanism (3
total)

**2 Human Rights Impact
Assessments**
to mitigate human rights
concerns

24 ESG Ambassadors
being trained across BUs

90.69% DEI score
compared to the 80.16% Top
Companies baseline

36% of staff
participated in gender &
equality trainings

2 key conferences
Women in Tech & RightsCon

70% of staff
completed the human rights
course in Cybolt Academy



4. Evolving international and regional legislation

During 2023, significant legislative changes occurred at both the international and European Union (EU) levels regarding due diligence and artificial intelligence (AI). Internationally, the Organisation for Economic Co-operation and Development (OECD) launched an updated version of the Guidelines for Multinational Enterprises on Responsible Business Conduct. This new version extends recommendations on due diligence in business relationships, places additional emphasis on the detection and identification of all forms of corruption, as well as provides recommendations for the protection of at-risk groups and on disclosure of information related to responsible business conduct.

At the European level, the EU adopted the Artificial Intelligence Act, which consists of a comprehensive set of rules for providers and deployers of AI systems, with transparency obligations and reporting requirements for entities operating or wishing to enter the EU market. Additionally, the EU is in the final stages of adopting the Corporate Sustainability Due Diligence and Corporate Sustainability Directive (CSDDD), which will be the first legally binding instrument on due diligence and corporate sustainability.

In line with Cybolt's vision of growth and expansion, these changes are fundamental, as we are mindful of the implications of EU legislative advancements in a globalized market. At Cybolt we care about what happens in other regions, due to our interest in being one step ahead regarding due diligence and aligning our operations with international best practices. We believe that early compliance with these standards will not only allow us to mitigate risks but emphasize that Cybolt aims to be a leading cybersecurity company that participates in the important evolution of ESG.



II. Environmental Responsibility

Cybolt is dedicated to fulfilling its role in environmental stewardship. We are in the process of defining a robust environmental action plan beyond regulatory compliance (laws, regulations, and environmental standards applicable to central operations). To this end, during 2023, our commitment has been reaffirmed through the following efforts:

- We took inventory of relevant information to begin determining the corporate carbon footprint.
- We advanced more responsible management in the consumption of material resources used in operations.
- We reviewed and updated the company's Environmental Policy.



1. Taking action on environmental responsibility

1.1 Carbon footprint

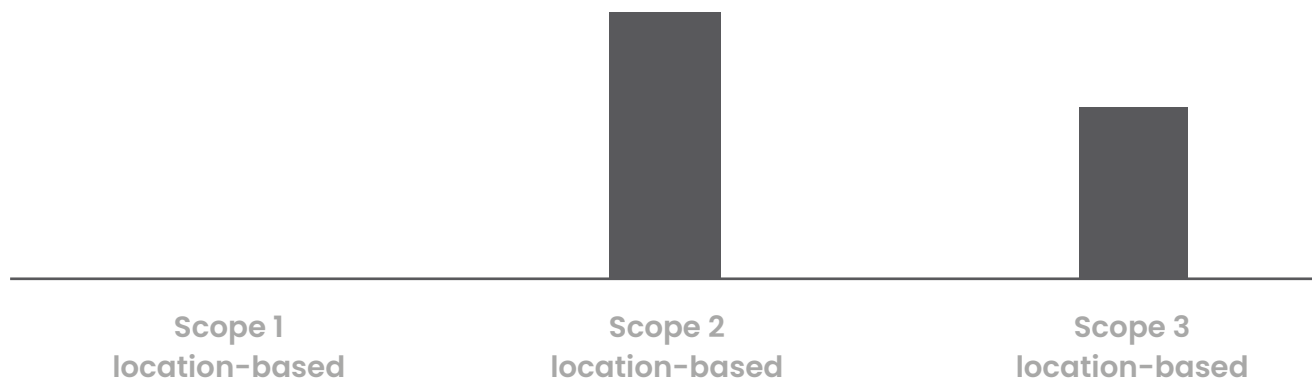
Understanding and responding to the environmental impact of our operations is a primary concern as we expand our physical infrastructure. Therefore, during 2023, we carried out a preliminary (baseline) assessment of the carbon footprint of the Technological Operations Center in Metepec, which includes the Data Center and the Security Operation Center (SOC).

CCF results overview (location-based)	t CO ₂ e	%
Scope 1 - location-based	0	0%
Scope 2 - location-based	1,043	61%
Scope 3 - location-based	674	39%
Total	1,717	100%

The results obtained from the study on Scope 1, 2, and 3 emissions, based on the location of the physical infrastructure, reveal a total of 1,717 metric tons of carbon dioxide or equivalent (t CO₂e) for the year 2022.

Scope 1, 2 & 3 - CCF Result Summary - 2022

CCF results overview (t CO₂e)



Disclaimer: The information provided does not represent Cybolt's total corporate carbon footprint, but rather a preliminary analysis towards estimating the total emissions as a corporate entity.

This initial emissions calculation was carried out by a third-party specialist, guided by the Greenhouse Gas Protocol. It includes, in Scope 3, activities related to fuel and energy (Category 3) and employee commuting (Category 7). Additionally, categories have been identified for future Scope 3 calculations, such as business travel (Category 6) and waste generated in operations (Category 6).



1.2 Management of Material Resources

Given the commitment to reduce, reuse, recycle, and separate waste, the company carried out the following actions in 2023:

- **Recycling:** Paper, metal, and plastic waste was separated disposed of at local recycling sites for final processing. In 2023, we recycled 900 kilograms (kg) of materials.
- **Reuse of Materials:** Spare computer parts are continually kept in storage for repurposing in the reparation of other equipment.
- **Waste Disposal:** Waste derived from electrical maintenance, air conditioning, diesel tank maintenance, and generators was disposed of in containers, in accordance with industry best practice concerning the management of hazardous waste. The total of these residues did not exceed 30 kg annually.
- **Environmentally Friendly Equipment:** We replaced three air conditioning units--in the Data Center and computer rooms--with new equipment that uses the environmentally friendly refrigerant R410a.
- **Energy Efficiency:** A project to replace 600 incandescent lamps in the Data Center with new LED lamps is nearly complete. The initiative began in 2022, and we managed to replace 90% of the bulbs in 2023. We expect to complete the replacement of bulbs during the second quarter of 2024, alongside the remodeling of the Center.





III. Social Responsibility

Expanding our commitment to ensuring respect, trust and safety are cornerstones of Cybolt's ways of working, we made progress in the following aspects:

1. Security and protection of our personnel
2. Training and professional development
3. Organizational culture
4. Diversity, equity, and inclusion
5. Social action
6. Human rights

1. Security and protection of our personnel

Workplace safety is paramount in ensuring the well-being of employees and promoting a healthy work environment. Cybolt has implemented accident prevention protocols for maintaining high security standards, not only to safeguard the integrity of our workers but also as a means of operational efficiency.

During 2023, we carried out the following actions to safeguard safety and promote health in the workplace:

- Training of health and safety brigades at each of our office locations¹
- Equipping all our facilities with first aid kits
- Developing a workplace health and safety protocol
- Implementing a nutrition program and hosting quarterly talks on improving dietary habits

The adoption of a gender-sensitive approach in actions related to worker safety is ongoing. For example, in 2023, travel policies were reviewed to ensure that appropriate security measures are implemented when female staff must go to areas with high rates of violence against women.

2. Training and professional development

Employee cybersecurity trainings encompass not only technical skills, but also education in Human Rights and ethics. A consistently trained workforce enables responsible decision-making in complex digital environments, fostering an ethics-based corporate culture.

2023 Trainings Name of the session	Women	Men
Business and human rights	77	134
Human rights due diligence	44	36
Creating equality in the workplace	49	57
Human rights in cyberspace	21	27

Additionally, five employees who identify as women participated in the 2023 Women in Tech Conference. The conference covered a variety of topics, such as feminist leadership, improving corporate culture, advancements in artificial intelligence, automation and data science, cybersecurity, and the future of work. The conference also provides opportunities for mentoring and partnerships.



¹ Training certificates in civil protection brigades were issued by CAPSHE Consultancy in July 2023. The multi-brigade training lasted for 15 hours and was conducted by an external trainer with STPS / HSG6505250005 registration.



I loved participating in several of the conference sessions, and getting an update on the technology industry, for example: new advances in software, the latest academic research, and how women have been a crucial in the sector, which is often not shown... Technology is not only the area where we operate, there are also other lines to explore and that can be relevant for us as Cybolt female collaborators.



Cybolt employee on her participation in Women in Tech.

ESG Ambassadors Program

In December 2023, Cybolt launched the ESG Ambassadors Program, involving representatives from each business unit. The program focuses on comprehensive training in ESG topics such as human rights, governance, transparency, and reporting.

The main objectives of the program are:

- Support the dissemination of relevant information across all business units
- Strengthen staff skills and involvement in ESG initiatives
- Include new ideas and perspectives into ESG initiatives
- Diversify the means of monitoring the implementation of ESG policies and procedures across the company

Currently, there are 20 ESG Ambassadors working throughout the company in its different locations. The ESG Ambassadors were selected by each unit leader, identifying committed and passionate employees on ESG issues. Thus, this program also aims to nourish a culture of responsibility and ethics throughout the company.

3. Organizational culture

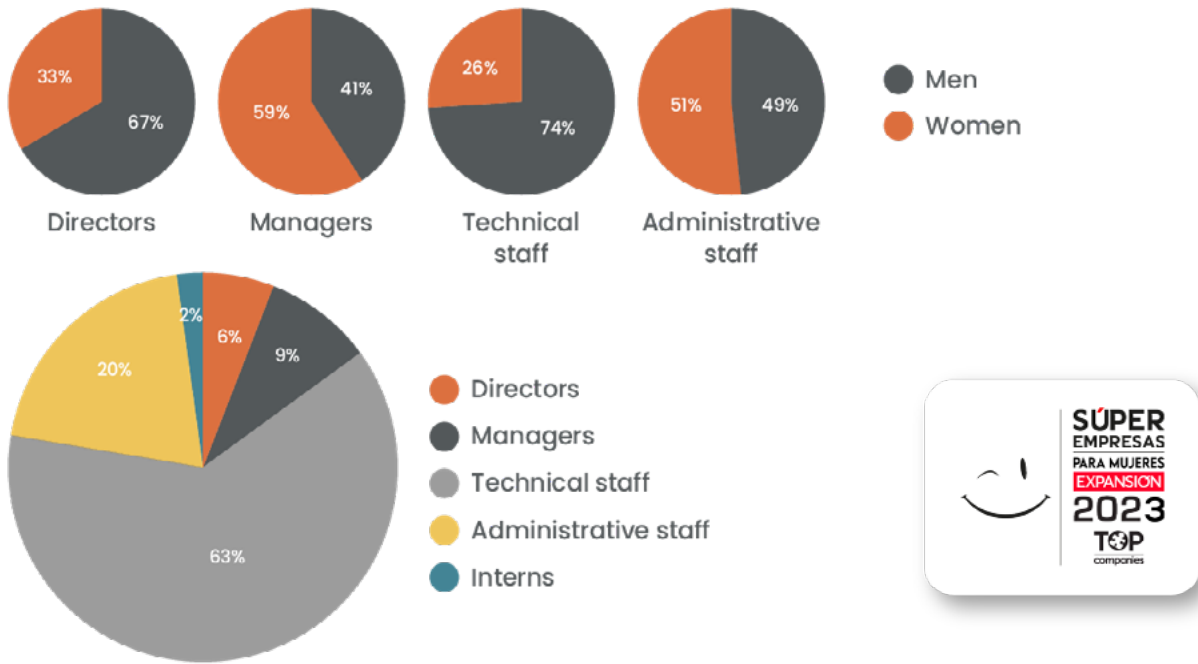
Based on our commitment to act with a people-centered approach, the organizational culture was independently evaluated using the Top Companies methodology to be considered for the 'Super Empresas de Expansión' ranking (the most recognized business magazine in Mexico). In 2023, Cybolt achieved outstanding scores, with a score higher than 80/100, in the following areas:

- Opportunities for growth regardless of sexual orientation.
- Current trust in leaders and middle management.
- Trust in the company's business vision.
- Belief in the company's accordance to policy and process compliance.
- Honesty and camaraderie as primary organizational values.
- Genuine commitment of the company towards the employee.



4. Diversity, equity and inclusion

Cybolt's has a total of 299 talented employees, of which 201 identify as men and 98 identify as women. The breakdown by gender and position within the company is represented below:



During 2023, Cybolt launched an internal campaign concerning diversity and inclusion, starting with the conference: “Building Equality in the Company” facilitated by GENDES, a non-governmental organization that specializes in gender equality. More than 100 employees attended the session, and we received feedback with comments such as:

“These topics are not normally discussed to such an extent, due to their being taboo or because they have not been granted the necessary degree of importance from leadership.”

“This is the first conference of this kind held at Cybolt, signifying a transformation that is more focused on the human experience, which is much appreciated.”

“The topic addressed is of great interest to both men and women, to understand the current context and what can be improved.”

5. Social action

During 2023, contributions were made to the following civil society organizations:

- Baby items were donated to *Red Materno Infantil* (Maternal and Child Network)
- Computers were donated to *La Salle Nezahualcóyotl* University

Additionally, staff volunteered with the following organizations:

- Fundación Mosaico Down (The Mosaic Down Foundation)
- Alianza Anticáncer Infantil (The Childhood Anti-Cancer Alliance)
- The Gonzalo Colosio Ducoing IAP Elderly Home
- The Paudi Orphanage
- Independent shelters for dogs

Highlight: Nurturing Young Talent

Cybolt's specialists participated in talks and conferences on cybersecurity with students at the Faculty of Sciences of the National Autonomous University of Mexico (UNAM). As part of a collaboration agreement with the Institute of Nuclear Science at UNAM, a recruitment process for postgraduates began through the *UNAMos Talentos* initiative. Cybolt contributed to the process by giving talks to potential students about:

- Trends and Challenges in Cybersecurity
- Competitive Advantages for Specializing in Cybersecurity

6. Human rights

Corporate Human Rights Policy

When we adopted our first Human Rights Policy in July 2022, the ESG Committee agreed to review it annually to ensure it is updated according to evolving international standards. Thus, the Human Rights Policy was reviewed in September 2023, incorporating the following:

- Recognition of the updated 2023 version of the OECD Guidelines for Multinational Enterprises
- Adding the principle of non-discrimination as a key axis in terms of human rights relevant to Cybolt's operations and activities
- Given the evolution of global conflicts, Cybolt refuses to engage in cyber-attacks against the civil and/or governmental infrastructure of a country by another state or non-state armed group
- New information about the new grievance mechanism

The Human Rights Policy is currently being integrated into the business strategy, decision-making processes, and corporate culture to ensure the company continually improves its work in respect of human rights.



Business & human rights trainings

In May 2023, we launched an online business and human rights course within the Cybolt University platform, aimed at all Cybolt staff. Based on publicly available materials on the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights, this course describes the responsibility of technology companies to respect human rights, as well as the need to identify and mitigate human rights-related risks. It also delves into the human rights risks that are most relevant to Cybolt as a cybersecurity company and what this means in the context of Mexico. Approximately 75% of Cybolt's staff (209 people) completed the online training. Since September 2023, this training is now part of the induction process for all new employees joining the Cybolt team.

6.1 Identification and mitigation of salient human rights risks

With the support of external human rights consultants, we conducted a high-level assessment of all technologies and services offered in Cybolt's current commercial portfolio. These products and services were evaluated based on severity (considering scale, scope, and remediation capability) and the likelihood of potential human rights harms. This assessment was carried out by prioritizing key human rights concerns as described in the policy.

In July 2023, Cybolt's ESG Committee President delivered a training on human rights due diligence to members of various business units and key functional areas. The objective was to ensure that leaders better understand the Human Rights Policy, as well as how to identify human rights risks and mitigation measures. More than 80 employees participated in the training sessions.

6.2 Human rights impact assessments

Two human rights impact assessments (HRIA) were conducted related to a product that was identified as high risk and a contract with a high-risk supplier.

The first HRIA involved a product developed with biometric and surveillance capabilities, intended to support public safety for a municipal government. This product underwent a thorough assessment, and the team is implementing technical and non-technical mitigation measures to ensure that it is used in accordance with human rights principles and that end users are less likely to face risks.

The second HRIA relates to the devolution of trust in a specific supplier. Cybolt was informed by credible reports that the supplier was not taking adequate measures to protect the right to privacy (in design, development, and sale) in their products, and that there may be forced labor in their supply chain. Since then, the business relationship with the supplier has been terminated, and they have been notified that their failure to ensure respect for human rights was the primary reason for such determination.



6.3 Participation in international human rights conferences

As part of the company’s efforts to continue strengthening its capacity to identify and mitigate human rights risks associated with its technology, the Chair of the ESG Committee and the Director of Cybolt’s Alliances division participated in RightsCon Costa Rica 2023. RightsCon is an annual summit organized by civil society that focuses on human rights in the digital age. Sessions included topics related to data protection, human rights-centered design, privacy, surveillance, and emerging technology. The conference provided an opportunity to learn from activists, journalists, United Nations officials, as well as other leading technology companies in the human rights space about the emerging challenges posed by evolving technologies and the work being done to address these challenges.





IV. Commitment to Good Governance

Cybolts ESG work is carried out through various entities, including the ESG Committee and the working groups that report to said Committee. The Committee is guided by an independent human rights consultant and a specialist in gender. The ESG Committee reports directly to the Chairman of the Board, and the CEO is periodically consulted on the committee's activities and decisions.

During 2023, the ESG Committee consisted of the Director of Alliances, the Co-director of the Risk Management and Compliance team, the Director of Human Resources, the Director of Infrastructure, Identity, and Information Security and a member of the Board of Directors.

Information about the ESG Committee is publicly available on Cybolt's website and information related to its work is highlighted during the company's annual kick-off meetings. The Committee holds monthly meetings in addition to ad-hoc meetings to address emerging issues.

To contact the ESG Committee, email: humanrights@cybolt.com

1. Improving business practices to better respect human rights and ethics

At Cybolt, we are committed to working with other companies and brands that also adopt a strong ethical stance in their business management. In order to better understand the ethical, human rights, and environmental considerations of our partners, during 2023, Cybolt developed a mapping of the ESG policies of business partners and a due diligence questionnaire that will be applied in 2024. In addition, Cybolt is in the process of developing a new due diligence procedure for partners.

One of the most noteworthy achievements of the year was the ISO 37001 certification, which recognizes Cybolt's advancements regarding:

- The adoption of an Anti-Bribery Policy
- Procedures for Managing Gifts and Similar Benefits
- Procedures for the Cybolt Integrated Management System (SGIC)
- Procedures for Managing Complaints, Concerns, and Investigations of ESG Policy Violations

As a company committed to eradicating bribery and corruption, we provide training to our employees and representatives in this regard. During 2023, the following measures were taken:

- Each staff member went through an induction process to the Cybolt Integrated Management System (SGIC) upon joining the company
- Informative sessions on anti-bribery policies and controls were provided regularly
- Monthly infographics were circulated to employees to inform them about the existence of these policies and controls

2. Incorporating a human rights approach into talent acquisition

In 2023, we began a review of talent attraction and hiring procedures to lay the foundation for more inclusive hiring practices. More work needs to be done, but thus far:



Attracting diverse talent

The ESG Committee reviewed the standard template for job profiles and added language that encourages individuals from diverse backgrounds and underrepresented communities within the technology sector to apply. We also conducted a review of new media and mediums for posting job profiles, to increase the chances of a diverse community being more aware of job offerings. The ESG Committee also suggested including several questions related to ESG issues in the interview process, to ensure that ethics and human rights are central from the beginning of the relationship with candidates and future collaborators.





Reviewing onboarding kits

The ESG Committee also reviewed and updated the hiring kit, which is what all staff receive when joining the company (including contracts, letters to staff about the dress code, travel policies, etc.). This information was reviewed to ensure that a gender-sensitive and inclusive perspective is considered, for example, that the dress code adapts to the needs of individuals with diverse gender identities and expressions, as well as indigenous cultures. All staff are now contractually obligated to comply with the company's ESG policies.

3. Risks related to auxiliary platforms in talent attraction processes

To facilitate the processing of applications, the talent acquisition team used two third-party digital tools to review candidate profiles. During this year, the methodology and criteria of these platforms were carefully reviewed.

For the first platform, Cybolt engaged with the company to request that it turn off the 'emotional intelligence' system linked to the review of candidate video submissions. We found that the system for detecting emotions did not have a clear methodology, and it was not confirmed to be audited for gender or racial bias. This particular emotional AI reading of candidates was never, and is still not, explicitly used for decision making in Cybolt, but we requested that it be removed altogether.

Regarding the second platform, we identified a risk related to the use of photographs in resumes. For this reason, during 2023, a session was held with the support team to address this risk that violates the principle of non-discrimination.² Based on the suggestions of the ESG Committee, it has been determined not to renew this service for 2024.

4. Management of other material risks

Considering that we are a company working to ensure the cybersecurity of our clients, a fundamental pillar of our operations is risk management, both internal and external. Internally, this refers to the mechanisms and procedures, accessible to employees and third parties, that work to mitigate any situation that may jeopardize the operations and the integrity of the company, personnel, business partners, and users.



² According to the U.S. Equal Employment Opportunity Commission: "Employers should not request a photograph from an applicant. If necessary for identification purposes, a photograph can be obtained after an offer of employment has been made and accepted."

4.1 Mechanisms for the prevention and identification of risks related to inappropriate conduct

At Cybolt, we encourage employees, partners, representatives, and suppliers to report violations of company policies, as well as to report unethical and unfair treatment. For this reason, mechanisms have been adopted and implemented to allow for the reporting of incidents and follow-up actions without fear of retaliation. In 2023, the following measures were executed:

- Development of a reporting procedure
- Establishment of a secure grievance mechanism (the Compliance Portal)
- Awareness raising for staff concerning Cybolt's ESG policies
- Creation of the ESG Ambassadors Program

4.1.1 Development of a reporting procedure

The ESG Committee has developed the Procedure for Complaint Management and Investigation of ESG Policy Violations to ensure an impartial and objective review of all complaints received through the Compliance Portal. These are clear and concise internal procedures for the use of the Compliance Portal, ensuring the confidentiality of the complainants and transparency by disaggregating data and findings, thus strengthening the credibility of the process.

Formal procedures and explanations of how the portal works are available to all staff in the Cybolt Integrated Management System (SGIC). When someone initiates a complaint through this mechanism, the first recipient is an external third party that administers the platform. Subsequently, it is forwarded to the corresponding committee or working group for action to be taken.³

4.1.2 The Compliance Portal



Source: <https://digital.cybolt.com/buzon/>

The Compliance Portal focuses on anticipating, assessing, and managing potential issues, as well as leveraging grievances as opportunities to systemically improve performance and decision-making. During 2023, Cybolt successfully resolved 100% of cases (three in total) that were reported through the Compliance Portal. All cases were reviewed by the Ethics Working Group, which conducted thorough and impartial investigations, and resolved them within four weeks of receiving the cases. The complainants were informed throughout the process about the steps and progress of the investigation, as well as the rationale behind the final outcomes. Once conclusions were reached, the ESG Committee ensured that recommendations were made to prevent similar contingencies in the future. Finally, the grievances were documented and the recommended actions were taken.

³ Cybolt has strict confidentiality policies for all those involved in reviewing the information submitted through the grievance mechanism and has a zero-tolerance policy for retaliation against those who use the Compliance Portal.

4.1.3 Awareness Raising of ESG Policies

In November 2023, Cybolt launched the “ESG Policy Challenge,” a company-wide initiative aimed at raising awareness for and the understanding of ESG policies and procedures. The challenge, open to all employees, incorporated gamification, where staff were tested on their knowledge of the policies. The three individuals who earned the highest number of points by correctly answering the most questions were rewarded with an additional day of vacation and exclusive Cybolt gear. Approximately 23% of the staff participated in the challenge.

The Compliance Portal was promoted throughout the ESG Policy Challenge.

4.1.4 ESG Ambassadors Program

The ESG Ambassadors program aims to drive the implementation of ESG Policies and Procedures throughout the company, while also fostering innovative ideas and diverse perspectives to contribute to ongoing efforts on ESG issues. The contribution of this program to good governance lies in the following objectives:

- Transmit information to the ESG Committee on behalf of their business unit with the aim of improving communication flow in both directions.
- Assist in the implementation of ESG Policies and Procedures throughout the company.

4.2 Mechanisms for managing risks related to the technology in use

4.2.1 Responsible use of technology

Given that innovation often outpaces regulatory frameworks, technology companies are crucial in guiding the deployment of technology in a way that prioritizes ethical considerations, user privacy, and social welfare. In 2023, we began developing acceptable use policies to ensure that customers have clearer delineations regarding the use or reservation of use of certain technologies, taking into account Cybolt’s ethics and human rights policies.

4.2.2 Business continuity risks related to operational interruptions

Preventive measures have been taken to ensure the continuity of both our own operations and those of our clients in situations beyond our control, such as environmental disasters. The Technology Operations Center in Metepec is strategically located considering two aspects: its proximity to Mexico City and lower seismic risk. These factors supported the decision to host the Beacon Lab in the same Operations Center.



The Beacon Lab is an observatory that detects, analyzes, alerts, mitigates, and protects institutions and individuals against global cyber threats. The Beacon Lab is housed within the Data Center, recognized as the first globally certified in cybersecurity, **Shield III, Black Seal**.



To further mitigate risks to business continuity, we've developed and distributed a methodology aimed at identifying factors that may impede operations at the Technology Operations Center. This protocol is housed within Cybolt's Integrated Management System repository, titled as the Business Continuity Risk Analysis. Moreover, this analysis aligns with the clauses outlined in the business continuity standard as per ISO 22301:2019.

During 2023, no cybersecurity incidents were reported regarding our data center.

4.2.3 Data security and privacy measures

Similarly, we have various policies governing the actions of the company to protect customer privacy and the security of their information. These policies and procedures are divided into:

- Privacy commitments
- Non-technical measures to protect the privacy of staff, customers, and end-users
- Technical measures to protect the privacy of staff, customers, and end-users



Privacy Commitments

At Cybolt, the privacy and security of information are our priority. Therefore, we have developed a series of robust policies, in addition to our privacy policy, to ensure data protection. For example, our Cybolt Integrated Management System adheres to strict standards that guarantee the confidentiality and integrity of information. Additionally, our Customer Property Preservation Control Policy establishes clear guidelines to protect customer assets, whether tangible or intangible, including personal data.



Non-technical Measures to Protect the Privacy of Staff, Customers, and End-Users

At Cybolt, data and information privacy are also safeguarded through non-technical measures. One of these measures includes the implementation of detailed privacy notices, which are made available to data subjects. These notices inform individuals about the handling of their personal information, including information regarding how we process their data and the avenues to exercise their rights in case of any concerns.

Furthermore, awareness campaigns on personal data protection reach 100% of our employees. In these campaigns, we emphasize the importance of knowing and understanding the rights, obligations, and responsibilities related to processing personal information.



Technical Measures to Protect the Privacy of Staff, Customers, and End-Users

Furthermore, various technical measures and procedures have been adopted to protect people's privacy, such as:

- 1. Vulnerability Management:** Cybolt employs systems that identify, remediate, and verify that different vulnerabilities of assets in computer networks and operational networks have been mitigated.
- 2. Security Incident Response Management:** Cybolt employs systems that resolve and manage high-impact security incidents in computer networks, operational environments, and physical environments, both internal and those of our clients.
- 3. Information Security Management:** Cybolt employs systems that ensure the confidentiality, integrity, availability, and authenticity of the information to which the company has access.
- 4. Cybersecurity Event Management and Monitoring:** Cybolt employs systems that define the business relationship process with customers to establish communication mechanisms and define a service complaint handling and escalation scheme, allowing corrective and preventive actions to be applied to correct the situation.

During 2023, no customer data breaches were reported.



V. Conclusion

In 2023, we achieved significant progress in advancing our ESG initiatives, but we recognize that challenges still exist and there is more work to be done. Our commitment to sustainability, social responsibility, and good governance demands dedication and continuous innovation. To continue building trust, initiatives in 2024 will include implementing a sustainability strategy that encompasses an environmental action plan for 2025-2030, assessing the human rights impacts of high-risk technologies, and finalizing the human rights due diligence methodology for sales and partnerships.

We will remain focused on enhancing our ESG initiatives to rise to emerging trends and regulatory requirements while steadfastly pursuing our purpose of driving positive change and fostering a culture of sustainability and ethical leadership.

Through ongoing efforts and strategic initiatives, we aim to exceed minimum standards, setting a precedent for responsible business practices and reaffirming our commitment to creating a more sustainable and equitable world for this and future generations.

If you have any questions about Cybolt's ESG efforts disclosed in this report, please do not hesitate to contact the ESG Committee via the following email address: humanrights@cybolt.com

VI. Acknowledgments

Our sincere gratitude to everyone who contributed to the creation of this 2023 report and all of the work that went into carrying out related activities.

Thank you for your hard work, and for driving Cybolt's continuous improvement!

This document not only reflects the achievements reached but also the spirit of collaboration and passion of the Cybolt team.

