

**CYBOLT**

Security Innovation

# Code of Ethics



## 1. Objective

To establish a normative behavioral reference framework for the actions of Cybolt's collaborators.

## 2. Scope

All those who engage with Cybolt.

## 3. Parties Responsible

- The People department
- The Ethics and Integrity Committee
- Leaders of each department or business unit
- Collaborators
- Interest groups

## 4. General Guidelines

- This document is of general application for all those responsible mentioned in item III.
- The Ethics and Integrity Committee, in coordination with the People department, will decide the consequences derived from non-compliance with this document.
- The People department is the one who will follow up on the complaints made and channel them to the Committee.
- To ensure that all members of the Cybolt team understand the necessity of complying with this document, the Ethics and Integrity Committee and the People department must carry out a work plan that includes an awareness raising and dissemination campaign of this document.

ELABORATED	REVISED	APPROVED
Meredith Veith	Mariana Leticia Paredes Pacheco	Mariana Leticia Paredes Pacheco
Human Rights Commission	PEOPLE DIRECTOR	PEOPLE DIRECTOR

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The Cybolt Code of Ethics does not pretend to be a moral class taught in school; it is a normative framework that regulates our way of acting at all times, which is why it represents the commitment of all of us who work here, since any behavior of an individual is the result of his or her way of thinking, values and philosophy of life.

I am sure that we will feel fully identified with these guidelines that are part of our life behavior and not only in the organization. I invite you to read it, commit to it, and act accordingly.

Let's make a difference!

Sincerely,

A handwritten signature in black ink, appearing to read "Luis Adrián Gómez", is written over a large, stylized orange logo that combines the letters "C" and "B".

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Luis Adrián Gómez

Chief Executive Officer  
of Cybolt



## Introduction

Cybolt was born from the integration of a group of leading Mexican companies in the industry to offer our clients comprehensive, deep, robust, and accurate solutions. Our operational centers are located in Mexico (Mexico City, Mexico State, Nuevo Leon) and Colombia (Bogota).

At Cybolt, we seek to bring the best of the best onto our team, that each partner who is one of us, is an impulse for the creation of our future; position ourselves as market leaders in cybersecurity is a fundamental part of the path we are building, facing customers and facing all players in the industry, being the platform capable of integrating them productively, fairly and easily.

The purpose of having a Code of Ethics and Conduct is to generate a daily working culture of adherence to institutional, universal and legal values, while maintaining principles of quality, respect, tolerance, honesty, equality, solidarity, order and service towards customers, employees and their families, suppliers, government institutions, competitors, the external community and the environment.

This Code does not replace any existing policy; therefore, the regulations, policies, guidelines, among others, previously established must also be respected.

The Code of Ethics is a tool to guide the behavior of all members of Cybolt and its affiliates. The guidelines written in this document must be adhered to in order to maintain a good image of the company, respecting the ethical and legal values, in addition to face any dilemma presented in the way of operation.

This Code applies to and external collaborators, including partners, shareholders, suppliers, customers and society in general, including care for the environment and its surroundings.

**Code:**

Set of rules and regulations on a particular subject.

**Code of Ethics:**

Document that establishes the fundamental principles and values that regulate the behaviors and attitudes of people who are part of the same context.

**Stakeholders:**

All those groups that are directly or indirectly affected by the development of business activity, and therefore also have the capacity to directly or indirectly affect its development. This includes partners, shareholders, collaborators, suppliers and customers.

**Bribery:**

Giving a gift to a person for a personal interest, corrupting trust or the common good.

**Audit:**

The process of verification and/or validation of the fulfillment of an activity according to what was planned and the stipulated guidelines.

# 1. Cybolt's Culture

## 1.1 Mission

Establish and preserve the trust of our clients by identifying, preventing and neutralizing risks.

## 1.2 Vision

Be *the* trusted ally in cybersecurity.

## 1.3 Valores

**Confidence:** Certainty to face the future. The security of walking a firm path to achieve all the goals set; operate quietly and firmly, being empathetic and aware of the needs of our customers as individuals and as a company.

**Integrity:** Complete, from start to finish, in our way of acting and in the level of services we offer. Attention at every step, every need for digital security, without exception; we know ourselves capable, possessors of the necessary pieces to face every challenge.

**Wisdom:** Knowledge acquired and created in technology, intelligence and clarity to meet the needs of our customers and our own, always putting the experience and commitment ahead, as well as the necessary temper to act with maturity in the face of any need of those around us.

**Partnership:** Create spaces of trust with empathy and from the vision and need of the other. Be allies and enablers of all players in the industry.

## 1.4 Ethical Principles

**Honesty:** It is a basic principle to proceed honestly, conducting oneself under principles of truth, fairness, justice and moral integrity in all our actions. In its relationship with Cybolt, its related companies, its shareholders, other employees, service providers, suppliers, authorities, as well as with any third party with whom they have a relationship derived from their relationship with us.

**Loyalty:** This refers to acting with good will and unrestricted commitment to shareholders, colleagues, suppliers, service providers, authorities, society and even to ourselves. In addition, this includes taking care of the company's assets, as well as safeguarding entrusted assets, maintaining the confidentiality of the information at hand, and protecting intellectual property rights.

**Respect:** Collaborators must act with respect when dealing with any internal or external person who has a relationship with Cybolt, recognizing the inherent value of every person, being impartial, without distinction, in order to preserve human dignity and personal integrity, avoiding any conduct that may be offensive.

## 1.5 Professional and Personal Performance

It is essential that all Cybolt collaborators adhere to the principles set forth in this code, as well as promote its dissemination and practice, this depends on the personal attitude of each of us who work here. It must attend to the practice of:

- Good manners.
- Objectivity.



## 2. Policies

- 2.1  **Normative Compliance**
- 2.2  **Ethics in Business**
- 2.3  **Equal Opportunities**
- 2.4  **Non-Discrimination**
- 2.5  **Abolition of Child Labor**
- 2.6  **Working Environment**
- 2.7  **Environmental Responsibility**
- 2.8  **Security and Hygiene**
- 2.9  **Role of Management**



## 2.1 Normative Compliance

Cybolt and its collaborators are governed by the law. Strict compliance with the rules, laws and internal codes is mandatory and should never be compromised, we do it convinced that the benefit of Cybolt is ours. All employees always act in the best interest of Cybolt, with moral quality and good will, leading by example.

## 2.2 Ethics in Business

The quality of our services is essential at all times. It is where our commitment and respect towards the client is demonstrated, always maintaining the good image of Cybolt and its leadership position within cybersecurity community. We keep and manage records according to documented procedures, following the protocols of confidentiality and security, both collaborators, customers and suppliers. We maintain a professional ethical attitude and way of working in situations where there is a doubt about the origin/intention of the business or activity to be carried out. We identify variables in preventive matters in order not to participate in businesses that could be illicit. We maintain ethical protocols of legality supported by documents in legal compliance.

## 2.3 Equal Opportunities

Cybolt es una empresa que promueve la diversidad, por lo que reclutamos, contratamos, desarrollamos, fomentamos y ofrecemos condiciones de empleo independientemente de raza, religión, sexo, edad, origen étnico o nacional, género, preferencias sexuales, discapacidad, estado civil, condición social o de salud, religión, condición Cybolt is a company that promotes diversity. We recruit, hire, develop, foster, and offer conditions of employment regardless of a person's religion, sex, age, ethnic or national origin, gender identity, sexual orientation, conditions of varying physical ability, marital status, social or health status, immigration status, political opinions or any other trait that could be improperly used as grounds for discrimination.

## 2.4 Non-Discrimination

Cybolt does not tolerate discrimination. We strive to ensure an inclusive work environment that fosters respect for ourselves, co-workers, shareholders, customers, users, business partners and suppliers, reflecting the diversity of the communities and sectors for which we work.

## 2.5 Abolition of Child Labor

Cybolt expresses its commitment to human and labor rights recognized in national and international legislation. Specifically, Cybolt expresses its total rejection of child labor and all types of forced, compulsory, or coerced labor. Cybolt has a zero-tolerance policy for child labor, will not resort to child labor, nor will it incorporate any product or service derived from it, and will always ask its collaborators and suppliers to strictly observe this principle.



## 2.6 Working Environment

The most valuable asset of the company is its talent; therefore, in Cybolt we strive to create a positive and professional work environment in which we all receive an inclusive, dignified and violence-free treatment. We show respect for those around us, whether they are our colleagues or other people who are in the facilities or are performing services for the same and maintain a positive behavior on the integrity, public image and interests of the company. Some of the actions that are detrimental to our work environment are insults, offensive speech, malicious and deliberately false statements about others, as well as verbal abuse. We take responsibility for our behavior by correcting any misconduct, and we raise any concerns we may have about behavior that appears to be in violation of our Code, in the interest of a respectful environment.

## 2.7 Environmental Responsibility

We encourage the use, development and diffusion of environmentally friendly technologies in our operations. We recognize the protection and preservation of the environment as a social commitment. Measures are taken to prevent environmental risks derived from the activities carried out by Cybolt. We seek to reduce the generation of waste, discharges to drainage, emissions to the atmosphere so that they do not generate environmental impact. It is our responsibility to consider how the company's behavior and actions impact the environment, as well as to promote the importance of environmental care with collaborators, suppliers, customers and various stakeholders.

## 2.8 Security and Hygiene

It is the responsibility of Cybolt's collaborators to know the regulations on health and safety at work, correctly complying with the safety regulations of each location. Necessary precautionary measures must be taken to maintain a safe and healthy work environment. All parties must participate in and maintain professionalism during drills. We all must be sure to know what to do in our workplace if an emergency or incident occurs. We all must know and follow the protocols of the emergency plan and previously established documents.

## 2.9 Role of Management

Management must act ethically and lawfully at all times, maintaining responsibility and a positive attitude in order to guide collaborators with integrity. Management must be a positive example for Cybolt's collaborators and stakeholders. Management team members will be responsible for:

- Carefully completing ethics and compliance training in a timely manner and ensuring that employees do the same.
- Complying with established codes, policies and guidelines, as well as know and promote Cybolt's philosophy, purpose and values in all activities.
- Assist and guide at all times to the members of their team on the matter.



# 3. Application of the Code of Ethics

## 3.1 Harassment

Harassment is any verbal or physical conduct that denigrates or shows hostility or aversion towards an individual by creating an intimidating, hostile or offensive work environment, as well as any other act or conduct established in applicable laws. Harassment involves a succession of incidents, although a single incident may be considered harassment if it is serious enough to have a significant adverse impact on the individual or the work environment.

Some examples of harassment are:

1. Yelling at, insulting and/or threatening another person, alone and/or in the presence of others.
2. Treating another person in a different or discriminatory way, alone and/or in the presence of other colleagues and/or management.
3. Hiding and/or manipulating information that is important to carrying out the job.
4. Creating malicious rumors about a person, negatively impacting their image and/or work.
5. Ridiculing a person's work in front of others.
6. Using any device (cell phone and/or computer) to send graphic and inappropriate material, without the consent of the recipient.
7. Encouraging other people to participate in any of the above actions.

## 3.2 Sexual Harassment

Sexual harassment includes unwelcome sexual words or conduct, requests for sexual favors, and/or other physical or verbal behavior of this nature towards a person, regardless of their gender identity, as well as any other act or conduct established in applicable laws.

Some examples of sexual harassment are:

1. Insistence on attending social activities and/or appointments—external to work-related engagements—after the person has made it clear that they are not interested.
2. Jokes and/or innuendos of a sexual nature.
3. Comments about a person's body, clothing and/or general appearance.
4. Touching or other forms of unwanted physical contact.
5. Exhibition and/or circulation of sexually suggestive objects and/or images.
6. Any situation where the acceptance and/or rejection of sexual advances is used, insinuated and/or threatened to be used as a basis for making employment decisions.
7. Using any device (cell phone and/or computer) to send graphic sexual material.



### 3.3 Abuse of Authority

Abuse of authority is understood as any situation in which any individual makes use of his position and/or authority over others, using it for his own benefit and/or against the interests of Cybolt, with or without misbehavior on others, as well as any other act or conduct established in the applicable laws. All those who have been entrusted with a position of authority over others and/or decision-making authority at Cybolt have a special obligation to exercise it responsibly.

Some examples of abuse of authority are:

1. Exhibiting behavior that is considered to be intimidation, harassment or bullying.
2. Interfering with the ability of others to work efficiently by hindering their access to information and/or resources.
3. Assigning tasks and/or personal favors to subordinates.
4. Routinely making unreasonable job demands.
5. Using credentials and/or position to obtain special attention and/or treatment.
6. Using the resources and/or information available due to your position for personal purposes.
7. Conditioning salary increases, promotions or assignment of accounts on the basis of personal favors or other means of improper and unprofessional conduct.

### 3.4 Abuse of Trust

At Cybolt, trust is a fundamental pillar, which is consistent with our way of thinking towards everyone who works at, and has a relationship with, the company. The misuse of the resources, information and/or accesses that have been granted with or without the purpose of obtaining a personal benefit and/or profit, directly or indirectly harming the company, are acts that violate the trust placed in all collaborators and could cause serious damages to Cybolt. Everyone who works at Cybolt must promote an environment of trust, which means we are all responsible for denouncing incidents that erode an environment of trust.

Examples of abuse of trust include:

1. Providing services without documents such as agreements or contracts for the trust placed and these are not remunerated.
2. Lending a company asset and the beneficiary abusing it, rendering it unusable or unavailable to the company.
3. Misusing the company name for personal gain.

### 3.5 Misuse of Confidential and/or Privileged Information

It is our obligation to protect the confidentiality of information entrusted to us as collaborators of Cybolt, both inside and outside the workplace, even after leaving Cybolt. In the same way, we must not use or provide others with information that is accessible due to our position or our work requirements, whether or not the disclosure of this information is for financial or personal benefit. The information that has not been classified as public cannot be shared with any other collaborator and/or third party, and its disclosure should not take place under any circumstances. In the event that the disclosure of confidential information is necessary for the correct performance of someone's function, this must be approved in advance. Unauthorized access to information, whether confidential or privileged, that is not communicated through the correct channel, is considered a violation of this rule. When you are not sure of the confidentiality of any information, ask your immediate boss to ensure that the case is handled appropriately. It is our responsibility as Cybolt team members to understand and comply with previously established confidentiality agreements.

Some examples of misuse of confidential and/or privileged information are:

1. Sharing information that should only be known to the person holding the position.
2. Generating and expressing to others the personal conclusions created around the confidential and/or privileged information to which they have access.
3. Making use of or revealing confidential and/or privileged information for personal benefit or for third parties outside the company.
4. Sharing information that is not classified as public with any person who works with and/or is related to the competition.

5. Manipulating and/or misrepresenting the confidential and/or privileged information to which they have access for their own benefit and/or in a way that harms the company.

6. Failing to protect confidential information of all Cybolt's internal strategies.

### 3.6 Use of Cybolt Owned and/or Indirect Resources

Improper use of company resources, including employee time, harms us all and damages Cybolt's performance and profitability. It is our responsibility as collaborators of Cybolt to take care of the work equipment, as well as to have an orderly work area for the comfort of the collaborators and the image of the company before the groups of interest. We must respect and protect Cybolt assets, whether they are infrastructure, administrative materials, or material assets. Care must be taken so that they are not damaged or lost, misused, wasted, sold or donated without authorization. We must avoid, at all times, the inappropriate use of computer systems.

Examples of inappropriate use of resources include:

1. Providing people outside the organization with prices given to customers.
2. Using the vehicles, or other objects provided for work, for purposes other than those for which they were granted.
3. Knowing about a mistake made in a service or product and not communicating it internally through institutional channels, within the organization.

### 3.7 Use of Information and Clients' Contacts for Personal Benefit

Due to the nature of Cybolt's operations, one of the most important and value-added assets for the business is computer systems and/or databases. For this reason, it is of vital importance that all collaborators maintain an ethical and professional approach to working with Cybolt-related data. It is essential that those people who, due to their position and/or responsibility within Cybolt, have access to information, use these contacts in accordance with the guidelines set forth in this Code of Ethics and Conduct without seeking to obtain a personal benefit and/or different from the objectives of the business. Cybolt collaborators and their families must not accept any type of gift, loan or favor from any supplier, client or other, when the latter has the intention of influencing any decision or negotiation. It is not acceptable for anyone within Cybolt to condition a transaction in exchange for attention, favors or gifts, nor to accept cash or its equivalent.

Some examples of use of information for personal benefit are:

1. Contacting any supplier, customer, partner or manufacturer on Cybolt's behalf for the purpose of obtaining information that will not be published by Cybolt.
2. Using the contacts generated within Cybolt to obtain useful information for objectives other than those of the company.
3. Damaging Cybolt's reputation and/or image with any supplier, client, partner or manufacturer in order to create a conflict between Cybolt and said source.
4. Requesting a special favor and/or gratuity from a supplier, client, partner or manufacturer in exchange for granting benefits outside of what is stipulated in the contract with Cybolt.

5. Facilitating or participating in any form of bribery, manipulation, exchange of gifts, donations and other personal benefits either in kind or cash to carry out illegal actions with third parties.

### 3.8 Fraud

For Cybolt, ethics is paramount, whether or not it has legal repercussions. Therefore, any illicit activity such as fraud will not be tolerated and must be reported to the authorities. For the purposes of this Code, fraud is defined as any activity in which any good, economic remuneration or lucrative benefit is obtained in a hidden or deceitful manner that goes against what is authorized by the company and/or the law, the foregoing without prejudice of the definition that the applicable Penal Codes carry out with respect to said crime. Fraud can be carried out by making use of the position, information or resources to which an employee has access due to their placement within the company. Therefore, any Cybolt employee who suspects or detects any activity of a doubtful nature, whether it has occurred or is about to occur, must immediately notify it to the Ethics and Integrity Committee.

Some examples of fraud are:

1. Seizing assets through deception, including assets of the company, our customers, suppliers, allies or manufacturers.
2. Charging or creating invoices for more or less than fair value, at the request of a client.
3. Making payments for any object other than that described in the receipts.
4. Payments secretly being made to a Cybolt collaborator by a supplier seeking to do business with the company in order to convince the collaborator to award business to the supplier or to obtain more favorable terms.

### 3.9 Conflict of Interest

Conflict of interest is an unethical situation, within the workplace, in which a person is seeking to obtain a personal benefit from their work and superimposing it on Cybolt. We must always avoid any situation that involves a conflict (or the appearance of one) between the personal interests of Cybolt employees and our obligations towards Cybolt as a company. For this reason, whenever a potential conflict arises, the interests of the company must prevail over our own individual, personal interests. An apparent conflict of interest can be just as serious as a real one.

### 3.10 Internal Relationships

In order to maintain clarity and balance in regards to decision making within Cybolt, it is important to know that personal relationships within the company must be taken into account to avoid possible conflicts of interest. An internal relationship is one that is generated and maintained between employees, customers and/or shareholders of the company, whether at Cybolt's facilities, customers' facilities, or off-site.

Some examples of conflict of interest arising from internal relationships are:

1. Hiring relatives of employees as collaborators or suppliers, whether direct or indirect.
2. Showing favoritism towards a collaborator, granting concessions or privileges.

### 3.11 Relationship with clients

At Cybolt we know that customers are a fundamental part of our success; That is why we must maintain our professionalism and integrity with each one of them. We define a client as any person who requests or acquires services provided by the company.

Some examples of conflicts of interest in relation to clients are:

1. Accepting trips with the purpose of making concessions to the client, and the invited collaborator does not take into account the investment or the benefit towards Cybolt. In these cases the authorization will be in charge of the area director respectively.
2. Performing or requesting favors from a client for personal benefit and/or superimposing it on the interests of the company, regardless of whether or not something is obtained in return.
3. Taking advantage of the relationship with a client in order to obtain a personal benefit.
4. Carrying out work outside the company for a client, regardless of whether or not a personal benefit is obtained.
5. Not giving notice about any violation or misconduct in which a client incurs.

## 3.12 Relationship with suppliers

Within a framework of respect and healthy competition, Cybolt seeks to grant suppliers an equal opportunity for being contracted, without generating false expectations, while looking for the best option for the company. We define a supplier to be any natural and/or legal entity external to the company that provides a service to it, for profit or not. It is essential to maintain a professional and ethical relationship with any supplier in compliance with Cybolt's objectives, without incurring or making the appearance of a conflict of interest.

Some of the examples of conflict of interest in relation to suppliers are:

1. Manipulating or giving misleading information about the advantages of a particular supplier to obtain, or not, a personal benefit.
2. Requesting or accepting a gratuity in exchange for the granting of any service or sale contract, or the maintenance thereof.
3. Selecting and/or granting concessions to one supplier over another without having a purpose for the benefit of the business and/or to favor an acquaintance or family member.
4. Not reporting to the Ethics and Integrity Committee any action detected which jeopardizes compliance with this Code.

## 3.13 Relationship with the competition

At Cybolt, we know that competition forces us to be better and to work better, pushing us to better position ourselves and maintain our leadership status in our industry. The competition is described as those companies that, due to the nature of their business, offer services and/or products similar to ours.

Some examples of conflict of interest related to competition are:

1. Providing confidential information or maintaining communication with the competition regardless of whether there is a personal benefit.
2. Providing a service to a company that, due to the nature of its business, is similar to ours.
3. Working with companies that are our competition, whether or not Cybolt resources are being used.
4. Starting, creating and/or investing in a company that is a competitor of Cybolt, while an employment relationship still exists.





### 3.14 Asset Protection

All Cybolt collaborators have the responsibility to protect and safeguard the assets that the company entrusts us with, either to perform our work optimally or to effectively safeguard them. Company assets are all tangible and intangible assets owned by the company, such as offices, machinery, equipment, inventories, cash, stocks, and shares. Company assets also include information, business plans, trademarks, patents, trade names, corporate image, information technology, among others. Cybolt's assets are granted according to the nature of the functions of each position. Said assets must be used to perform the work and never to satisfy personal needs and/or personal projects. Where permitted by law, Cybolt reserves the right to control how employees use assets, including the right to inspect all email, data and files stored on company computers.

Some examples of the improper use of assets:

1. Using for personal or family members' benefit, the assets provided by Cybolt, for work performance.
2. Failure to report, in a timely manner, any damage in the various offices where Cybolt operates.

### 3.15 Company Property

Company property is defined as those resources in a fixed situation that cannot be moved, such as facilities, furniture, among others. Every Cybolt collaborator is responsible for promoting the respect and correct use of the properties that the company has made available for the execution of the company's own businesses and activities.

Some examples of misuse of company property are:

1. Making use of property for personal benefit, whether or not for profit.
2. Deliberately, or due to lack of care, damaging the company's property.
3. Carrying out any work and/or modifying any property owned by the company without prior authorization.

### 3.16 Work Tools

For Cybolt, it is essential to provide the necessary tools and/or work equipment to all collaborators; however, it is the responsibility of each collaborator to make good use and safeguard the integrity of said tools. A work tool is considered to be any material, resource, information or means of work that the company makes available to collaborators to be able to carry out the specific activities and/or tasks corresponding to each position in an optimal way. Similarly, the services that we have and those services we hire should only be used for the purpose of performing the functions entrusted and for the benefit of the company itself; they may not, in any way, be used for different purposes. In addition, it is our obligation to take care of these tools, avoid mistreating them and/or wasting them.

Some examples of misuse of work tools are:

1. Using work tools for personal benefit.
2. Deliberately or carelessly damaging the tools provided by the company.
3. Negotiating and/or providing work tools to any other collaborator of the company and/or external persons who, due to the nature of their position, should not have access to said tool.
4. Using work tools for a purpose other than that stipulated by the company when they were assigned.

### 3.17 E-mail, Internet and Information Systems

Cybolt email and Internet accounts must be used responsibly as it is critical to protect the security of our information systems. Our information technology systems are a key component to our business and are provided for authorized business purposes only. Use of these systems must be in compliance with our acceptable use norms. Staff are permitted to make occasional personal use of Cybolt's phone, email and Internet (social networks), as long as such use does not:

1. Consume a lot of time or resources.
2. Interfere with your work performance or that of others.
3. Involve illegal, sexually explicit, discriminatory, or otherwise inappropriate material.
4. Relate to outside business interests.
5. Violate this Code or any other company policies.

While we generally do not monitor or control the use of our information systems, Cybolt reserves the right to monitor, record, disclose, audit, and delete, without notice, the nature and content of contributor activity by the use of email, telephone, voicemail, Internet and other company systems, to the extent permitted by local law.

## 3.18 Intellectual Property

At Cybolt, we always use our trademarks and intellectual property appropriately. Our intellectual property is an invaluable asset that we must protect at all times. Intellectual property includes our registered or unregistered trademarks, packaging design, logos, copyrights, inventions and/or patents. Under no circumstances should we allow a third party to use our trademarks or other intellectual property without proper authorization and a license agreement approved by management. Furthermore, our trademarks must never be used in a demeaning, defamatory or offensive manner. Our intellectual property also includes the work products of external contributors.

Any work created by a Cybolt collaborator, in whole or in part, in connection with work-related duties, and/or using company time, resources, or information, is the property of Cybolt. For example, inventions, ideas, discoveries, improvements, processes, designs, software, or any other material that employees may have assisted in creating or generating in connection with their work is the property of Cybolt. Employees must disclose any invention related to our business immediately so that it can receive the same protection as other intellectual property of our company.

Likewise, Cybolt collaborators should never use the intellectual property of any third party without their express consent. This includes, without limitation, registered or unregistered trademarks, packaging design, logos, copyrights, inventions and /or patents.

Some examples of the improper use of intellectual property:

1. Failing to request that any service or product marketed by Cybolt be protected, knowing the risk of being used by the competition to the detriment of Cybolt.
2. Using the Cybolt logo and trademark for personal purposes.

## 3.19 Drug and Substance Abuse

It is essential for all Cybolt to have people who are free from the influence of substances that could prevent the performance of activities safely and effectively. The use, possession, sale, transportation, and distribution of drugs or any other controlled substance is prohibited. Any Cybolt employee found to be under the harmful effects of a drug, alcohol or any other impairing or illicit substance will be subject to the corresponding disciplinary measures. The foregoing applies in the same way to any external personnel who are within the company's facilities.

Some examples of substance abuse in the workplace are:

1. Bringing alcohol and/or any narcotic drug to the Cybolt facilities, regardless of actual consumption, without prior authorization.
2. Ingesting alcohol and/or any narcotic drug within company facilities and/or in a company vehicle without prior authorization.
3. Arriving to the workplace under the influence of alcohol and/or any drug that affects the performance of their duties and/or judgment for decision-making.

## 3.20 Bribery and Corruption

In general terms, “corruption” refers to the act of obtaining or attempting to obtain a personal gain or business advantage through improper or illegal means. At Cybolt, we have a zero-tolerance policy for acts of corruption. We do not bribe, offer or give money, favors, or services in order to obtain benefits unlawfully. No employee is allowed to make and/or receive payments outside the law with entities, people, public or government authorities to secure any concession, contract, approval, or advantages for their own benefit or that of the organization. Employee decisions must never be influenced by corruption. Corrupt arrangements with customers, suppliers, government officials, or other third parties are strictly prohibited. Corruption can involve the payment or exchange of anything of value, and includes, the following activities:

1. Corruption (bribery of a government official or commercial bribery).
2. Extortion
3. Giving or receiving bribes

Corrupt activities are not only a violation of this Code, but can also be a serious violation of civil and criminal anti-bribery and anti-corruption laws in various countries. If you become aware of an actual or potential corrupt arrangement or deal, it is your responsibility to speak up and report it.

## 3.21 Money Laundering

Money laundering is the concealment of the origins of illegally obtained money, typically by means of transfers involving foreign banks or legitimate businesses. In other cases, money laundering also covers the concealment of criminal activities through legitimate funds, through fraud, bribery, theft and smuggling. At Cybolt we are firmly committed to complying

with national and international regulations related to money laundering to avoid that we participate in activities or arrangements that may be related to assets of criminal origin. At Cybolt, we carry out honest accounting and complete financial records in accordance with current regulations, always generating legal information and ensuring that accounting, financial and internal control procedures are managed correctly and in a timely manner. For Cybolt and its collaborators, participating in any form of money laundering is prohibited.

Some examples of money laundering are:

1. Registering corporate names of companies and invoicing simulated operations.
2. Carrying out unclear bank operations whose origin is not known or that are not transparently registered in Cybolt’s accounting system.

## 3.22 Political Activity

Using company resources to conduct personal political activities is prohibited. Cybolt encourages its collaborators to get involved in their communities, which may include engaging in political activity, outside of working hours. However, the collaborator may not use company funds or resources or receive reimbursement from the company to conduct personal political activities, including making contributions to candidates or political parties. You should avoid even situations in which you appear to be doing so.

Some examples of inappropriate political activity:

1. Asking collaborators to support a political party candidate at the time of elections.
2. Using company resources for advertising or political campaigning.

# 4. Ethics and Integrity Committee

## 4.1 Ethics and Integrity Committee

The Ethics and Integrity Committee is the body in charge of Cybolt's Ethics and Behavior Program, which must at all times observe the principles of legality, integrity, efficiency, impartiality, transparency and zero tolerance to corruption and bribery, to ensure compliance with this document, as well as to analyze, clarify and, where appropriate, determine the sanctions applicable to any misconduct that may have been committed.

### Committee Responsibilities:

- The Committee is responsible for coordinating awareness and training actions in conjunction with the People area to disseminate, promote and raise awareness among collaborators about the culture of ethics, morals and values; as well as to ensure knowledge and application of proper compliance with this code.

### Responsibilities of the Committee President:

- Design and implement the control, monitoring and auditing system of integrity standards throughout Cybolt's structure.
- Create, review, improve and administer the complaint/denouncement systems within the organization and facilitate collaboration with the competent authorities, as well as the establish the investigation processes and the corresponding disciplinary systems applicable to those who fail to comply or transgress the internal regulations and/or or national legislation in the performance of their duties.
- Design, implement and evaluate ethics-related systems and training processes for Cybolt personnel.
- Develop the structure and roles of the Committee.

### Responsibilities of the Committee Secretary:

- Develop, revise and modify the Cybolt Code of Ethics concerning matters of integrity and continued learning.
- Manage complaints and denouncements, attending to cases presented before the committee through the complaints mechanism and ensuring they receive due attention until their complete resolution.
- Develop the Committee calendar and schedule of regular meetings.
- Document Committee activities and meeting minutes.

### Responsibilities of the Committee Members:

- Promote compliance with the norms on ethics and integrity
- Implement permanent actions that promote the ethical behavior of Cybolt collaborators in the performance of their duties or positions
- Encourage reporting of violations of the Cybolt Code.
- Approve, unanimously or by majority vote, the draft resolutions of consultations, complaints or denunciations related to the aforementioned topics that the Committee submits for its consideration
- Protect, at all times, the confidentiality of the information related to the files that are integrated due to the queries, complaints or reports submitted for its consideration.
- Act in full compliance with the Code of Ethics and all other previously established protocols, regulations or policies.

## 4.2 Integration of the Ethics and Integrity Committee

The Ethics and Integrity Committee has been implemented and is made up of representatives from the different areas and Business Units (BUs), whose main function is to hear and address any complaints reported for non-compliance with the Code.



## 4.3 Reporting Mechanisms

The means of formal complaint to report a possible and/or actual violation of this Code of Ethics can be done through the institutional email: **denunciaetica@cybolt.com**

You may also write directly to any of the listed members of the Ethics and Integrity Committee.

## 4.4 Reporting Process

The process to be followed to report a complaint to the Code of Ethics and Conduct:

1. Sending a letter and/or mail to the account [denunciaetica@cybolt.com](mailto:denunciaetica@cybolt.com) or any of its members, describing the possible offense or conflict of interest to be evaluated, taking into account the following characteristics: Person(s) who made the possible offense and possible offense committed and evidence (if available).
2. Meeting(s) by the Committee to evaluate the complaint made.
3. Conclusion on the fault and the sanction(s) to be applied.
4. Communication on the next steps to be taken (if applicable).

## 4.5 Disciplinary Measures

Violation of the Code, our policies, or the law may result in:

1. The application of a disciplinary measure which may involve an administrative reprimand or the termination of the employment relationship, depending on the nature and severity of the violation of the Code.
2. In the case of violation of the law, civil and/or criminal penalties may be imposed by a government agency or a court of law.

This document and the actions arising from it, will be subject to internal or external audits in accordance with the requirements of the company and will be attended by the President and the Secretary of the Ethics and Conduct Committee or by whom the CEO of Cybolt assigned to present the requested evidence.

**CYBOLT RESERVES THE RIGHT TO MAKE CHANGES OR UPDATES TO THIS CODE OF ETHICS AND CONDUCT AT ANY TIME.**

**DECLARATION OF ADHERENCE TO THE CODE OF ETHICS AND CONDUCT.**

I have read, accept, and agree to abide by and help enforce Cybolt's Code of Ethics and Conduct. I know that I have the right and the duty to report violations of this Code.

I will do my best to promote and honor what is contained in this document.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

ELABORATED	REVISED	APPROVED
Meredith Veith	Mariana Leticia Paredes Pacheco	Mariana Leticia Paredes Pacheco
Human Rights Commission	PEOPLE DIRECTOR	PEOPLE DIRECTOR

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