CYBOLT
Security Innovation

ESG
Report
2024

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About Cybolt

Cybolt creates spaces of trust through comprehensive, innovative and holistic cybersecurity solutions. Our operations centers are located in Mexico (Mexico City metropolitan area and Monterrey), Colombia (Bogota) and the United States of America (Chicago, Tennessee & California).

Our mission is to establish and maintain the trust of our clients by identifying, preventing and neutralizing cybersecurity risks.

We proactively prevent critical incidents and provide swift, reliable solutions to ensure seamless data recovery and the rapid restoration of IT operations during disruptions.

We help public and private sector clients mitigate security risks across all infrastructures, devices, identities, information systems, and technological resources.

2019
Cybolt was formally established

+320
Employees

+250
Clients

+250
Technical Certifications

+35
Technology Partners

A leader in risk management solutions, Cybolt brings together 25 years of expertise from multiple specialized cybersecurity companies.

We have Technological Operation Centers in Metepec: SOC (Security Operation Center) and NOC (Network Operation Center) and 1000 alternate physical positions in the Data Center for necessary customer situations.

We have ensured business continuity for more than half of Mexico's investment banking sector. We also provide risk and compliance consulting to leading financial institutions, retailers, and other industries worldwide.

We have a team of specialists certified in the main access and identity management technologies (IAM).

We leverage leading products and solutions from our technology partners to conduct cybersecurity assessments and deliver tailored protections for each client's unique challenges.

About this report

This report highlights Cybolt's progress in fiscal year 2024 on key initiatives in social responsibility, environmental sustainability, and good governance. Cybolt launched its ESG journey in late 2021 with the establishment of the ESG Committee and a public commitment to integrating a human rights approach into its operations. Since then, the company has remained dedicated to conducting business with integrity, responsibility, and purpose.

We are committed to deepening our understanding and effectively managing key environmental, social, and governance (ESG) issues, considering both risks and opportunities. Over the past twelve months, we've made significant strides in our ESG program, establishing a path of continuous improvement through evaluations and certifications, as detailed on page 30. Internally, we underwent structural changes, and a key focus this year was reviewing and strengthening our governance program, updating policies and procedures, and placing a stronger emphasis on training.

Our point of view

Our goal is to create social value, take responsibility for our environmental impact, and contribute to the local, national, and global communities to which we belong. We are committed to developing solutions that positively impact users and businesses, focusing on security, privacy, and human rights to help them achieve their goals and unlock their full potential. We recognize that we are on a continuous learning journey and must remain alert to the implications of rapidly advancing technology. To stay ahead, we prioritize ongoing employee training, monitor global regulatory changes, and collaborate with external experts to ensure our practices address emerging risks. As we grow and our influence expands, our responsibility to operate ethically grows as well.

We acknowledge that there is still much to be done, and we count on the support of our staff, customers, partners, and investors to help us reach our ambitious goals.

CYBOLT
ESG
Report 2024

Publication date: January 31, 2025

Letter from the Chairman of the Board

We are navigating a rapidly changing world and business environment, where organizations must balance social well-being, climate action, human capital development, and corporate citizenship. At Cybolt, we are tackling this challenge by strengthening our sustainability strategy, investing in diversity and inclusion, and intensifying our efforts to reduce our environmental impact.

I am pleased to present Cybolt's annual report on ESG initiatives and progress for 2024. This year has been a milestone for Cybolt: we enhanced our governance structure, expanded our ESG team, and conducted a more comprehensive Environmental Impact Assessment for our data center in Mexico. Our ESG initiatives are deeply integrated into our business strategy, ensuring long-term value creation for our stakeholders and society.

While we are proud of our progress, we remain dedicated to continuous learning and improvement, guided by industry best practices and stakeholder feedback. At the same time, we continue to help our clients protect their businesses through cybersecurity services, supporting them as they navigate digital transformation to achieve their goals and drive their success.

The cybersecurity industry must prioritize and protect individuals and companies, ensuring the secure flow of information, maintaining data integrity, safeguarding privacy, and strengthening trust.

Since our last ESG report, we have made improvements across all areas, including increased recycling efforts and greater lighting efficiency. I am grateful to our visionary and dedicated team for their commitment to advancing our ESG initiatives.

It is both an honor and a responsibility to present, on behalf of the entire Cybolt team, our progress in aligning corporate strategy with sustainability. Thank you for your continued trust and support as we work toward a more responsible future.

Sincerely,

Mauricio Rioseco
Chairman of the Board Chairman of the Board

> " Since our last ESG report, we have made improvements across all areas, including increased recycling efforts and greater lighting efficiency. I am grateful to our visionary and dedicated team for their commitment to advancing our ESG initiatives. "

Summary of progress

In 2024, Cybolt made significant progress in its commitment to sustainability, inclusion and social responsibility. From key milestones, such as joining the United Nations Global Compact, to metrics that reflect the impact of our initiatives, this year marked tangible progress toward our vision of being a more ethical and socially responsible company. Below, we highlight the most relevant achievements and some indicators that support these advances.

Key milestones for 2024 include:

- **Joining the United Nations Global Compact** in November 2024.

- **Launching the English version of the Compliance Portals** and raising awareness on how to use it.

- **Hiring the first full-time sustainability position within the company.**

- **Developing the Diversity, Equity and Inclusion strategy,** led by Human Resources with the support of a gender expert.

- **Participating, for the second year, in the Women in Tech conference.**

- **Developing the second version of the Environmental Impact Assessment for our data center in Mexico.**

2024 Highlights
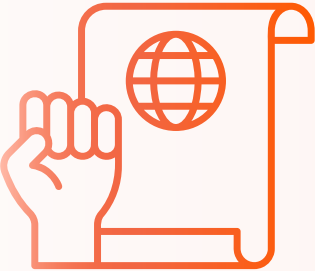
197 employees completed the Human Rights course (61% of staff).

70% of staff participated in at least one training on Diversity, Equity and Inclusion (DEI).

Score of **90.85 for DEI,** by Top Companies, compared to the average company score of 80.34.

We carried out **4 ESG trainings for all staff** on topics including diversity and inclusion, fraud prevention and how to use the Compliance Portal.

19 ESG Ambassadors actively participated in the ESG program. The ESG Ambassadors program empowers representatives from each Business Unit of the company to promote environmental, social and governance (ESG) initiatives, raise awareness and coordinate actions within their teams.

7 cases were submitted through the Compliance Portal, five of which have been resolved, while two submitted at the end of December are still in progress.

10 workshops for ESG Ambassadors covering topics such as environmental regulations and compliance, the importance of ESG for each business unit, proper use of the Compliance Portal, and mitigating reputational, operational, and legal risks through ESG practices.

Our ESG commitment

As our ESG program continues to develop, so does our opportunity to: address and mitigate risk from a more holistic perspective; attract, retain and motivate top talent; and drive business growth in a more sustainable and organic way. We will continue to do so by ensuring the alignment of our ESG-related programs with our strategic initiatives. This year we continued to provide transparency on our ESG initiatives with our voluntary disclosures, which we seek to align with ISO, Global Reporting Initiative and SASB standards.

In this report, we explain more about Cybolt's progress in relation to:

Environment

- Carbon Footprint
- Energy
- Water
- Waste

Social responsibility

- Training and professional development
- Organizational culture
- Employee well-being
- Diversity, equity and inclusion
- Community engagement
- Human rights

Good Governance

- ESG Committee
- ESG Ambassadors Program
- Data security and privacy
- Anti-corruption and anti-bribery
- Continuous improvement

Joining the UN Global Compact

Cybolt decided to join the UN Global Compact as part of its ongoing commitment to sustainability and human rights. This initiative aligns us with an internationally recognized framework that promotes key principles in areas such as human rights, labor practices, the environment, and anti-corruption. Reportedly, 96% of companies participating in the Compact report that the program has helped advance their sustainability strategies—a benefit we aim to leverage to strengthen our own ESG initiatives. Being part of the Global Compact not only allows us to reinforce our internal practices but also enables us to contribute to positive global change. We are excited to engage with other companies in the Global Compact community, share lessons learned, and gain valuable insights from experts in business and human rights across industries.
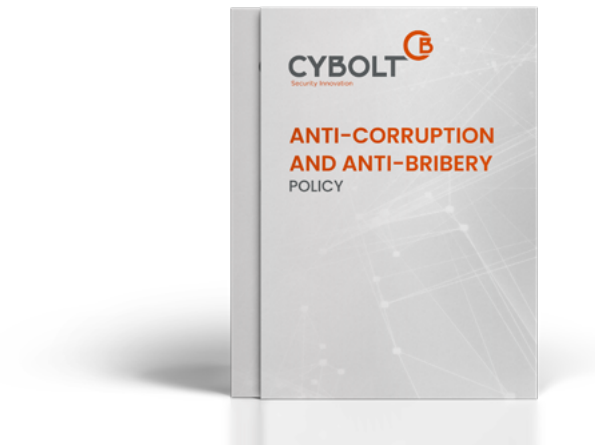
WE SUPPORT
UN GLOBAL COMPACT

[1] Source: UN Global Compact.

ESG Policies and Procedures

Category	Title
Policy	Code of Ethics
Policy	Equality and Non-Discrimination
Policy	Human Rights
Policy	Environment
Guide/Procedure	Procedure for Managing Complaints, Concerns and Investigating Non-Compliance with ESG Policies
Agreement	Confidentiality Agreement – Compliance Portal
Policy	Anti-Corruption and Anti-Bribery
Guide/Procedure	Procedure for Managing Gifts and Similar Benefits
Guide/Procedure	Human Rights Impact Assessment Template
Guide/Procedure	Compliance Portal - Case Documentation Form

Our internal Integrated Management System encompasses the strategies, policies, and procedures we have implemented to ensure responsible decision-making aligned with the highest standards. All staff have access to these policies and procedures, as well as dedicated channels to request support or clarifications on their content.

At Cybolt, we are committed to providing solutions that deliver security, peace of mind, and trust, meeting our clients' requirements while adhering to applicable legal and regulatory standards. We guarantee the protection of personal data, as well as the confidentiality and integrity of information, through strict compliance with industry standards in the management of IT projects and services.

Cybolt's business continuity strategies help us to remain resilient in the face of emergencies or operational disruptions. These strategies are detailed in the **Good Governance** section of this report.

In addition, we comply with anti-corruption and anti-bribery laws, following the guidelines set by our compliance function and taking responsibility for any violations of our policies. Cybolt has a zero- tolerance policy towards various ESG-related violations, and corruption is one of them. We promote a safe environment for whistleblowers and do not allow retaliation against them. In consultation with external experts, the ESG Committee works closely with our teams (namely the compliance, environment, and ethics working groups) to continuously review and improve our Integrated Management System.

CYBOLT | **CODE OF ETHICS** POLICY

CYBOLT | **HUMAN RIGHTS** POLICY

CYBOLT | **ENVIRONMENTAL** POLICY

CYBOLT | **ANTI-CORRUPTION AND ANTI-BRIBERY** POLICY

ENVIRONMENTAL RESPONSIBILITY

We are focused on the future, and to protect our way of life while navigating the global digital transformation, it is essential to act immediately to safeguard our planet. For this reason, we are developing plans to ensure the environmental impacts of our operations are identified, measured, and better controlled. We are also developing new procedures for the selection of more energy-efficient systems and promoting the use of reusable and recyclable products, while investing purposefully to combat the climate crisis. At Cybolt, we are committed to working and focusing our efforts on reducing the environmental footprint of our operations, including the management of GHG emissions.

We strive to foster a culture of sustainability by providing training on responsible practices to drive meaningful change. Our environmental policy reinforces our commitment to aligning with international standards, including the Greenhouse Gas Protocol (GHG Protocol), as we work to better understand and mitigate our environmental and climate impacts. Our main objective is to manage resources for our operations in the most efficient way, which means we must:

- Implement energy efficiency technologies to reduce total energy consumption.

- Promote efficient water use by installing water-saving devices and reusing water from the rainwater harvesting system.

- Improve waste management by implementing recycling programs and reducing electronic and general waste. With a goal of reducing waste sent to landfills.

- Establish alliances with suppliers that offer technological solutions prioritizing energy efficiency, water conservation, and waste recycling.

Highlights:

Cybolt is dedicated to fulfilling its role in environmental management. Here are the results of our efforts in 2024.

We collaborated with external consultants to carry out an environmental impact analysis of our emissions data in Scopes 1 and 2. More information about this will be provided later in this report.

This year, seven technology equipment disposals were carried out, properly managing approximately 585 kilograms of electronic and electrical waste for reuse and responsible disposal.

In 2024, recycling of materials such as cardboard, paper, plastic and glass increased by more than 50% compared to 2023.

Two of Cybolt's largest facilities had 100% their lighting replaced with LED bulbs.

We have created a new position within the ESG team focused on raising awareness, developing initiatives, and driving progress on environmental and sustainability issues.

Greenhouse gas emissions

Cybolt analyzes the amount of greenhouse gas emissions generated by data center operations, focusing on:

Energy consumption:

Evaluating electricity consumption by cooling systems, servers and energy backup equipment.

Emissions associated with electrical consumption:

Scope 2 emissions will be quantified related to the use of electricity coming from the power grid.

Backup power:

Scope 1 emissions will be assessed, specifically those generated by the use of fossil fuels in motor generators.

Environmental impact report of the data center in Mexico

In 2024, an Environmental Impact Assessment was conducted using data from the previous year to measure the carbon, water, and waste footprint generated by the data center. The facility has an operating capacity of 500 TB of data storage, representing the majority of Cybolt's operations in Mexico. The assessment followed standardized methodologies, including the GHG Protocol guidelines, and utilized data from the EPA and the International Energy Agency (IEA).

We analyzed the greenhouse gas emissions generated by the data center's operations in accordance with the GHG Protocol guidelines. Standard conversion factors were applied to calculate greenhouse gas (GHG) emissions and the water footprint associated with consumption.

This phase included:

- **Scope 1 Emissions:** Direct emissions from diesel consumption in generators and the use of refrigerants in cooling systems.

- **Scope 2 Emissions:** Indirect emissions associated with the data center's electricity consumption. These were calculated using sources approved by the GHG Protocol, such as the IPCC (Intergovernmental Panel on Climate Change). The following data sources were used: the Global Warming Potential (GWP), Mexico's national energy emission factor, data from the CFE (Federal Electricity Commission), and studies from the INECC (National Institute of Ecology and Climate Change).

The results of this assessment will serve as the foundation for developing and implementing medium- and long-term sustainability strategies aimed at reducing carbon emissions, water consumption, and waste generation. These efforts align with the Sustainable Development Goals (SDGs) and international environmental agreements, including the Paris Agreement.

Energy

As a cybersecurity services company, Cybolt requires significant energy to power its servers, data centers, and other IT equipment.

Efficient energy management not only reduces costs but also enhances the performance and longevity of technological infrastructure. Implementing energy-efficient technologies—such as low-power optimized servers and advanced cooling systems—can improve operational efficiency while extending equipment lifespan.

An energy-efficient workplace contributes not only to environmental sustainability but also to employee well-being. By adopting cleaner technologies and optimizing workplace conditions, companies can foster a healthier and more productive work environment.
In 2024, all lighting fixtures at the Metepec SOC in Mexico were replaced with LED lighting. This initiative aimed to enhance energy efficiency, increase durability, generate long-term cost savings, and reduce environmental impact.

Regarding electricity consumption, Cybolt used 12,459.23 GJ across all its operations and facilities in 2024, resulting in 1,515.87 tons of CO_2e. This calculation is based on the region's average electricity emission factor of 0.492 kg CO_2e/kWh (Michelin Connected Fleet). These insights provide a foundation for developing a future strategy to further reduce Cybolt's footprint by adopting more efficient energy solutions.

> Efficient energy management in data centers and IT equipment not only reduces costs but also improves the performance of technological infrastructure.

2024

Consumption of
12459.23 GJ
in all activities and facilities

→

Equivalent to
1515.87 ton CO_2e

→

Using
0.492 kg CO_2e/kWh
(Michelin Connected Fleet)

Water

Cybolt recognizes that data center operations can significantly impact water resources in its surrounding area. In 2024 alone, approximately 1,316 m³ of water were used at the Metepec SOC, reflecting a 400 m³ reduction compared to 2023. While water use may not seem as directly linked to this sector as energy consumption, responsible water management is crucial to Cybolt's sustainability and operational efficiency.

Data centers—essential to a cybersecurity company—require cooling systems to maintain optimal server temperatures, which can consume significant amounts of water.

As part of its commitment to environmental responsibility, Cybolt considers water management a key priority. To address this, the company is working to enhance water usage assessments, implement capture and reuse systems to reduce overall consumption, and adopt efficient cooling technologies to minimize its impact on water resources.

Waste

As a technology company, we rely heavily on advanced network resources, infrastructure, hardware and technological equipment, as well as other IT devices that our employees use to carry out their tasks. We are aware that electronic waste can have harmful effects on the environment and on human health, as they contain highly dangerous substances such as mercury, nickel and cobalt and on human health, as they contain highly dangerous substances such as mercury, nickel, and cobalt. If this electrical and electronic waste is not properly managed and disposed of, the adverse effects can extend to the soil, even contaminating groundwater. Additionally, if they are burned, there will be a significant atmospheric impact in terms of global warming.

This year, we have identified and started collaborating with certified providers to manage our electronic waste. In 2024, four instances of magnetic tapes and hard drives destruction were carried out, totaling 585 kg for the year. After destruction, the certified provider handles the collection, material separation for reuse, and proper disposal, providing a manifest that includes weights and the procedure followed.

Our goal is to strengthen our management of urban solid waste (USW) generated by employees--such as paper, plastics, and organic waste--as well as special handling waste (SHW)--which includes electronic waste and obsolete equipment, including servers, batteries, light bulbs, and storage devices--and hazardous waste (HW)--which means waste from air conditioning system maintenance, such as oils and refrigerants, and toners and printer cartridges. We are developing an implementation plan for recycling programs and reuse strategies to minimize the environmental impact of Cybolt's waste.

Building a sustainable future

By the end of 2024, we began developing a Sustainability Work Plan, which will serve as our new strategy, going beyond mere regulatory compliance. This strategy aims to enhance the management of environmental risks, increase transparency, optimize resources, streamline processes, and inspire the adoption of innovative practices to reduce environmental impact. The Environmental Working Group (GTA) is setting new objectives and improving communication to integrate sustainable practices across the company, ensuring a reduction in environmental impact while maintaining regulatory compliance. This initiative also fosters a forward-thinking culture and strategies focused on ecological responsibility.

SOCIAL RESPONSIBILITY

The digital world is becoming increasingly interconnected, and it is essential for companies to act ethically, transparently, and responsibly—not only with customers but also with society at large.

By adopting our ESG approach, we are committed to promoting digital security education and awareness through training programs on best practices for employees, customers, and the community. This enables us to not only protect our customers but also contribute to building a more prepared and digitally aware society.

To further our commitment to making respect, trust, and safety the cornerstones of the Cybolt way of working, we have made progress in the following areas:

- Organizational culture.

- Training and professional development.

- Employee well-being.

- Diversity, Equity and Inclusion (DEI).

- Identification and mitigation of significant risks to human rights.

- Due diligence of Cybotlt's partner companies.

Organizational culture

At Cybolt, we place great value on fostering growth and continuous improvement within our organizational culture. Top Companies, one of Mexico's most esteemed business magazines, once again evaluated Cybolt's culture and work environment in 2024. We are proud to highlight the following areas where we received exceptional ratings, achieving a score of at least 81% / 100%:

- There are opportunities for growth regardless of sexual orientation.

- There is no sexual harassment in the workplace.

- Staff have confidence in the company's business vision.

- The company's ways of working are based on compliance with policies and processes.

- Honesty and fellowship are key organizational values.

- The company is committed to carrying out programs that benefit society.

Cybolt's Score Over the Years, Analyzed by Top Companies

Cultural factors	2024	2023	2022	2021
Diversity and inclusion	**90.85%**	90.69%	89.05%	92.46%
Social responsibility	**87.19%**	85.50%	83.82%	85.92%
Leadership	**83.04%**	82.89%	83.42%	82.61%
Work attitude	**82.13%**	80.41%	82.68%	85.47%
Identification with the company	**80.16%**	78.38%	80.17%	79.78%
Organizational dynamics	**77.63%**	75.38%	76.93%	79.44%

Taking care of our people

Although technological tools are essential in the cybersecurity sector, strategic decision-making and risk management depend on people. This is why we believe it is important to support, care for, and support the development of our employees.

To strengthen our ESG initiatives, we need to better understand and support all Cybolt employees. Every person, regardless of their role, has a positive impact and adds value to the company.
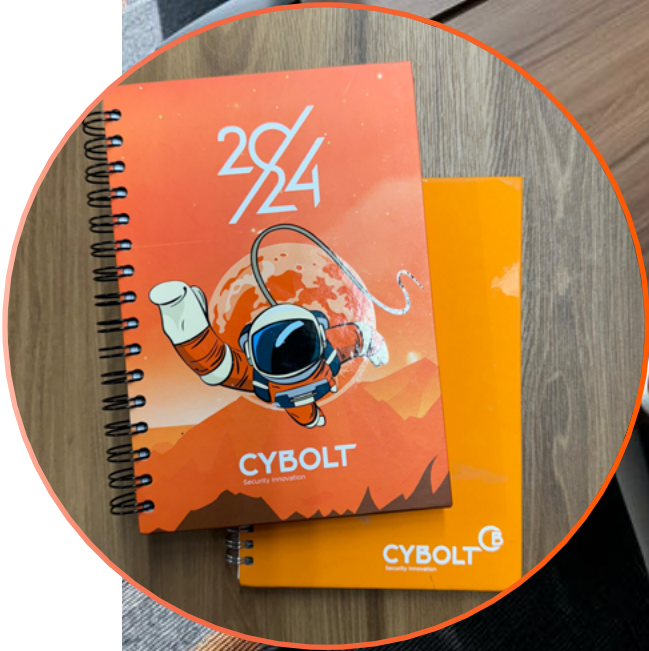
Training and professional development

Technical training, as well as education on human rights, ethics, diversity, equity and inclusion, contributes to the success and sustainability of the organization in an environment of increasing and constant digital threats. Having well-trained staff facilitates responsible decision-making in complex digital environments, and promotes an organizational culture based on ethical principles.

During 2024, we increased our training courses for collaborators and formed alliances with expert organizations in order to reinforce key knowledge and skills:

The following programs were carried out via the Cybolt Academy platform:

1. CYBER CAPABILITY 101: Introduction to applied cybersecurity (operating systems, networks, programming, and cybersecurity concepts).

2. IAM (Identity and Access Management) BOOTCAMP: Fundamentals for identity and access management.

3. CYBER AWARENESS: Information Security.

4. CYBER CAPABILITY 601: Cyber-defense (defense - in - depth model).

5. OT (Operational Technology) BOOTCAMP: Fundamentals for protecting Industrial Control Systems (ICS).

It is required for participants to apply and be selected for these courses. The results for 2024 were as follows, compared to 2023:

2024
Program

	Applicants	Accepted	They finished	Accredited	Rate of accreditation	Rate of completion
January CYBER CAP. 101	11	11	11	11	100%	100%
May IAM BOOTCAMP	193	41	39	35	95%	90%
July CYBER AWARENESS	358	358	ON	ON	ON	ON
August OT BOOTCAMP	116	43	37	30	86%	81%
October CYBER CAP. 101	43	43	38	35	88%	92%
December CYBER CAP. 601	57	29	ON	ON	ON	ON
	778	525	125	11	92%	88%*

*Accreditation 101

2023
Program

	Applicants	Accepted	They finished	Accredited	Rate of accreditation	Rate of completion
April OT BOOTCAMP	78	29	25	22	86%	88%
September CYBER CAP. 101	76	32	31	23	97%	74%
October EXPLOIT LAB!	35	22	22	NA	100%	NA
November CYBER CAP. 101	57	37	34	26	92%	76%
	246	120	112	71	93%	75%*

*Accreditation 101

In addition, the following internal training courses were provided on leadership, diversity, equity and inclusion, human rights, among other fundamental topics:

2024 Training Courses

Name of the training course	Women	Men
Human rights training	71	126
Bribery prevention	68	112
Creating a Culture of Respect in the Workplace	42	57
Equality & leadership	91	134
Using Cybolt's Compliance Portal	47	71
How to prevent fraud in the company	39	46
Diversity, equity and inclusion at Cybolt	84	74

Pizza Training

Pizza Training is an internal initiative that fosters knowledge-sharing, professional growth, and team connection. Employees can apply as speakers to share their expertise during these monthly sessions, which create an open space for discussion and collaboration.

Beyond skill development, the program strengthens relationships through the exchange of ideas and experiences. Each session ends with a casual gathering over pizza, reflecting Cybolt's commitment to a dynamic and inclusive workplace culture.

Pizza training topics from 2024 included:

- Business continuity from a practical perspective
- Basic principles of project management
- Strategies for clear and effective texts
- Learning to learn
- 10 steps to improve your presentations

Participating in empowering spaces

Earlier this year, Cybolt launched an open call to participate in the Women in Tech 2024 conference. Anyone who identifies as a woman within the company was eligible to apply, regardless of their business unit or seniority in the organization. The Women in Tech conference is a global event that celebrates diversity and inclusion in the technology field, offering networking opportunities, workshops, and talks from leaders who seek to empower women and underrepresented groups in the technology industry. On behalf of Cybolt, three women attended dozens of sessions, including: Inclusive Leadership in Cybersecurity, The Power of Collective Creativity, Understanding Compliance and Risk in AI, and How is a Digital Transformation Different from a Digital Shift?.

Testimonials from participants:

> **It was a very rewarding experience, I heard from women all over the world who have different ideas and ways of thinking.**

> **Attending a tech conference led entirely by women is an incredible experience. Hearing diverse perspectives and insights is both inspiring and empowering, motivating you to continue growing personally and professionally. Women's empowerment in technology extends beyond the workplace— it broadens your understanding of what it means to be a woman and the challenges we face in both our careers and personal lives.**

Staff wellbeing

Creating a culture of well-being is crucial for maintaining a healthy work environment, addressing both physical and mental health. Supporting employees' emotional and psychological well-being reduces stress, enhances quality of life, boosts productivity, and lowers turnover. A holistic approach to well-being improves individual performance while strengthening the company's long-term competitiveness and sustainability.

At Cybolt, Health Days are held regularly, offering employees activities like glucose and cholesterol testing, HIV screenings, vaccinations, and posture improvement exercises. Active break workshops and relaxation sessions led by external specialists are also part of the initiative. In 2024, seven successful Health Days took place at three Cybolt facilities in Mexico.

Additionally, Cybolt Refresh is a program that gives employees designated days off to recharge and focus on their well-being. Since this initiative is not an official holiday, certain departments with ongoing client commitments continue their regular schedules. These days offer valuable opportunities for personal time, quality time with family, and well-being.

Diversity, Equity and Inclusion (DEI)

Diversity, Equity, and Inclusion (DEI) are essential for a cybersecurity company, as they bring a wide range of perspectives and approaches to problem-solving—critical for tackling complex and ever-evolving security threats. A diverse team is better equipped to understand and anticipate the needs of various customers and user groups, enhancing the effectiveness of cybersecurity solutions.

In line with Cybolt's Non-Discrimination Policy, the company has developed a comprehensive DEI strategy. This strategy aims to foster a more inclusive work culture, ensure equal opportunities for all employees, and harness diverse perspectives to drive innovation and resilience in the cybersecurity field.

> " At Cybolt, promoting diversity, equity and inclusion is not only a social responsibility, but an investment strategy that strengthens competitiveness and ability to innovate effectively. "

DEI Training

By 2024, 70% of Cybolt employees, or 250 people, had received training on diversity and inclusion issues.

Cybolt staff were trained by experts from GENDES (Gender and Development A.C.), a Mexican civil society organization focused on promoting gender equality, particularly by working with men to foster allies in gender justice. The two training sessions were:

• Creating a Culture of Respect in the Workplace.

• Equality & Leadership

Testimonials:

" GENDES' training has helped improve all of my relationships, both personal and professional. "

" Something very notable is Cybolt's willingness to talk about these issues. "

" I would like to see topics of this type discussed more often. "

International Women's Day 2024

On International Women's Day, Cybolt celebrated the talented women driving innovation and excellence within the company. In a field where only 24% of the global cybersecurity workforce is female, and in Mexico, where just 3 in 10 women are STEM (Science, Technology, Engineering, and Mathematics) professionals, Cybolt reaffirmed its commitment to greater inclusion. The celebration featured a video showcasing the extraordinary contributions of women at Cybolt, along with an open invitation for more women passionate about cybersecurity to join the company's mission.

## The DEI Strategy and associated action plan for 2025-2030

Advancing diversity, equity, and inclusion (DEI) helps Cybolt attract and retain top talent, build trust with stakeholders, and ensure ethical, equitable decision-making in an industry that safeguards sensitive data and digital infrastructure. To drive these efforts, the Human Resources team leads Cybolt's DEI initiatives in collaboration with the Ethics Working Group.

The DEI strategy was developed with guidance from an external human rights and gender expert to ensure it aligns with the aspirations and needs of Cybolt's workforce. The process included multiple employee consultations to capture a diverse range of voices within the company. The draft policy was reviewed by ESG Ambassadors, and a company-wide survey was conducted to gather anonymous feedback. One hundred and five people participated in the survey, with 34% of respondent (37 people) identifying as members of historically underrepresented groups in the tech sector.

With the strategy now finalized, Cybolt is working with the same expert to develop a DEI action plan, set for launch in 2025. This action plan will incorporate many of the insights and feedback shared by Cybolt staff.
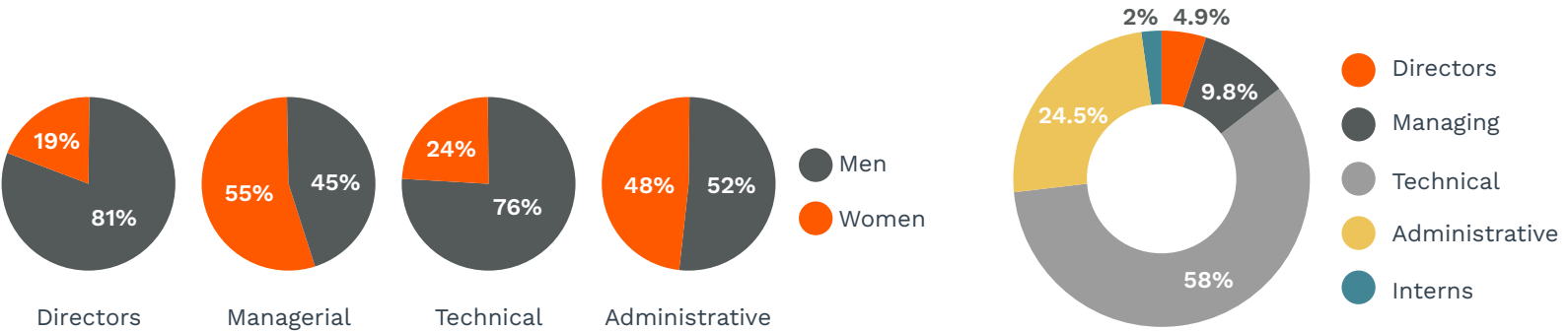
DEI Survey Results

The results below visually demonstrate the number of respondents as well as the percentages of people who identify as historically underrepresented groups in the technology sector. When the survey was launched, Cybolt had a total of 305 employees.

Total responses 105 out of 305 collaborators (35%)

84% women

16% LGBTQI

37 respondents
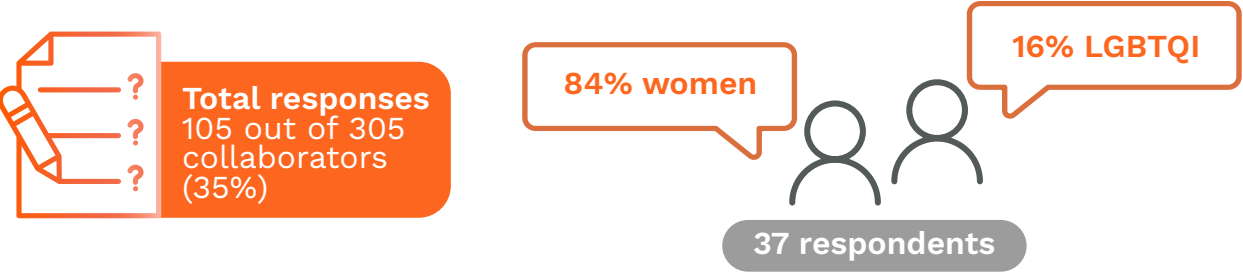
Gender distribution in Cybolt

In 2024, Cybolt's internal community has expanded to 321 employees, with 190 identifying as men and 131 as women.

The pie charts below break down the workforce by role within the company, including directors, managers, technicians, and administrators, providing a clearer view of the distribution across different positions.

Directors: 19% / 81%
Managerial: 55% / 45%
Technical: 24% / 76%
Administrative: 48% / 52%

Men
Women

2% 4.9%
9.8%
24.5%
58%

Directors
Managing
Technical
Administrative
Interns

Promoting a human rights approach to business

As a cybersecurity company, we understand that our operations have an impact on the safety of people. Therefore, we recognize that respecting human rights is an essential component to building trust with our clients, partners, investors and other key stakeholders.

Since 2022, Cybolt has had a Human Rights Policy that establishes our commitment to develop initiatives aligned with the United Nations Guiding Principles on Business and human rights. This approach has been led and strengthened by our ESG Committee, chaired by an independent expert in business and human rights, who provides an external and impartial perspective.

In 2023, we expanded our commitment by developing and implementing a specialized course to train our staff on human rights, fostering an organizational culture based on these principles. This course is provided to all Cybolt staff. In addition, we have established procedures to carry out Human Rights Impact Assessments, a process carried out with the support of external experts to ensure a rigorous and comprehensive analysis of the risks and opportunities related to our technologies and operations.

Identifying and mitigating significant human rights risks

Building on the human rights due diligence trainings conducted in 2023, this year's efforts were reinforced with the creation of a due diligence working group. The working group comprises key staff members from the Partnerships, Sales, Compliance, Legal and Governance, Risk and Compliance teams. One of the goals of this working group is to better integrate ESG indicators into decision-making processes when entering into relationships with customers, partners and suppliers. The working group meets monthly to better coordinate efforts to drive this work forward.

Partner Due Diligence

Cybolt has been actively mapping various ESG-related indicators applied in the companies we work with, assessing aspects such as the existence of human rights policies, commitments to environmental sustainability, and diversity, equity and inclusion programs. We are proud to work with partners who share our values, and we are pleased that most of them are also advancing their own ESG initiatives.

Through these initiatives, Cybolt reaffirms its commitment to respecting human rights, strengthening trust, and promoting a safe and ethical digital environment for all.

77% of Partners
Have at least 1 ESG indicator

74% of Partners
Have made environmental sustainability commitments

74% of Partners
Commit to improving diversity & inclusion

Community Engagement

Engaging with our communities is key to building trust, promoting sustainability, and creating value. We are committed to organizing and participating in initiatives that foster social development, contributing to a fairer and more prosperous future for all.

Empowering the next generation of experts

On April 23 and 24, we had the honor of participating as sponsors in the Cybersecurity, Challenges and Opportunities conference, 2024 edition, organized by the National Autonomous University of Mexico (UNAM). During the event, two of our Directors from the Cyber Academy department and the GRC (Governance, Risk and Compliance) department presented to the students about building a cybersecurity career.

We also took the opportunity to promote our IAM Bootcamp, and 16 students and recent UNAM graduates had the chance to significantly advance their training through the program. We're pleased to share that, as a result of this initiative, six of these candidates have already been hired and have a career plan within Cybolt.

This event allowed us to exchange ideas with industry experts, share our innovative solutions with budding professionals and reaffirm our commitment to filling the cybersecurity skills gap in Mexico.

Helping hands

In 2024, we are committed to building a fairer and more sustainable future for our communities. Through our social action, philanthropy, and volunteer initiatives, we unite to make a difference, contributing with impactful actions. We are proud to promote the following programs, which are directed and sustained by our collaborators.

We recognize their sense of support and collaboration to continue contributing to the following causes:

Mosaico Down Foundation

The Mosaico Down "Chocola-thon" is a fundraising activity that allows the foundation to continue providing classes and therapies to people with Down syndrome and other intellectual disabilities.

> We donated $730 USD.

The Mosaico Down Race for a Cause is a annual event at Six Flags Mexico that promotes the inclusion of people with Down syndrome. Organized since 2015 by the Mosaico Down Foundation, it seeks to raise awareness about equality and diversity, raising funds through allies such as Cybolt through registrations that will be used for educational and development programs.

> We donated $780 USD.

Become a magic king: It is an initiative in which Cybolt staff sponsor different children, elderly people or people with disabilities, from different foundations. The recipient receives a letter from the Three Wise Men and then delivers the gifts to that special person. Participation is voluntary and the families of the collaborators can also participate.

> We sponsor 15 children.

Childhood Anti-Cancer Alliance

The alliance organizes the collection and recycling of bottle caps to generate funds, which are then used to assist children and individuals with limited resources affected by the disease. Cybolt staff actively contributed to the initiative by collecting and delivering bottle caps regularly throughout the year.

> We donated more than 200 kilos of caps.

> We deliver ev We deliver bottle caps each quarter in 2024.

Volunteering for Senior Citizens

Gonzalo Colosio Ducoing Elderly Home: visits to the nursing home for seniors include activities such as Letters from the Heart, where letters with heartfelt messages are delivered, and social gatherings that provide opportunities to spend time together, engage in activities, and offer companionship to the seniors on a quarterly basis.

> Visits every Q – 2024: 4 throughout the year.

> Time invested: 20 hrs.

> Participants: 30 collaborators.

Paudi Orphanage and Help and Solidarity with Street Girls Foundation.

Become a magic king: Similar to the Mosaico Down Foundation program, staff are paired with individuals that are under resourced in order to grant them gifts.

> We donated 25 gifts.

Independent dog shelters:

Cybolt's participation consists of donating food and supplies, as well as organizing walks, baths, supporting the well-being and care of animals in vulnerable situations.

> Donation of food, toys, time for walks and baths.

> Time invested: 5 hrs.

> Success is more meaningful when it is shared. Every action is a step towards a safer, more supportive and more inclusive world.

Delivery of bags with plastic caps for the Alliance Against Childhood Cancer.

GOOD GOVERNANCE

Strong corporate governance is the cornerstone of our commitment to sustainable, ethical and transparent business development. Over the years, ESG principles have been progressively embedded in our business and culture, and they continue to evolve to meet the demands of a changing world. Our ESG initiatives, particularly those involving good governance, play a critical role in achieving our corporate vision of a safe and secure world.

Governance structure

The Governance, Risk and Compliance Department, the Business Resilience Department, the Legal team, together with the Compliance Working Group are responsible for ensuring that we maintain our certifications and comply with external audit requirements. This includes the completion of all necessary ISO reports (27001 – Information Security Management Systems; 20000 – IT Service Management; 9001 – Quality Management Systems; 22301 – Business Continuity Management Standard; 26000 – Social Responsibility) and the submission of information to consulting firms.

The ESG Committee reports directly to the Chairman of the Board of Directors. The Board of Directors has the right to submit requests for information to the ESG Committee and vice versa.
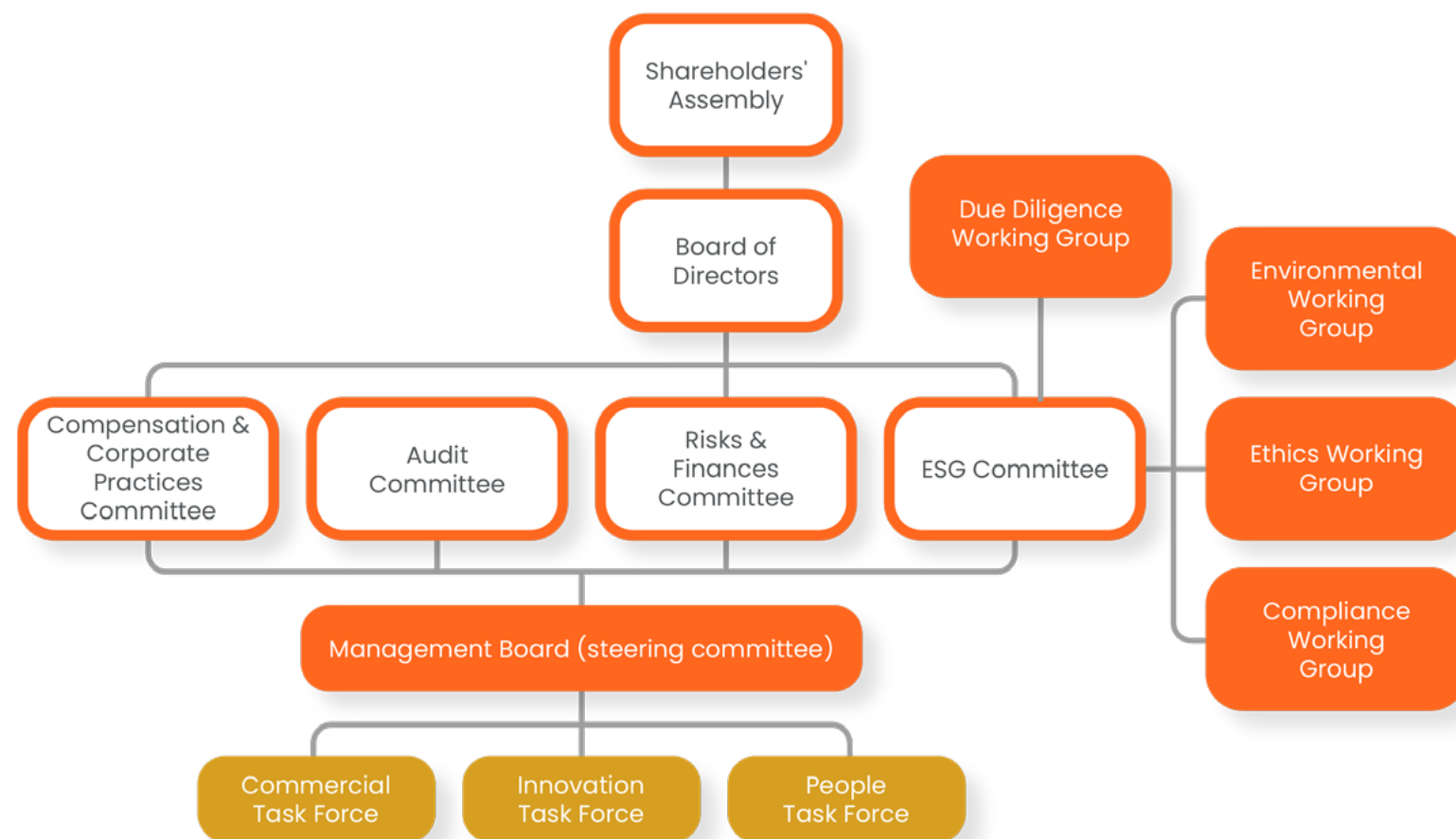
*The Due Diligence Working Group was created in 2024 to improve internal Due Diligence policies and procedures.
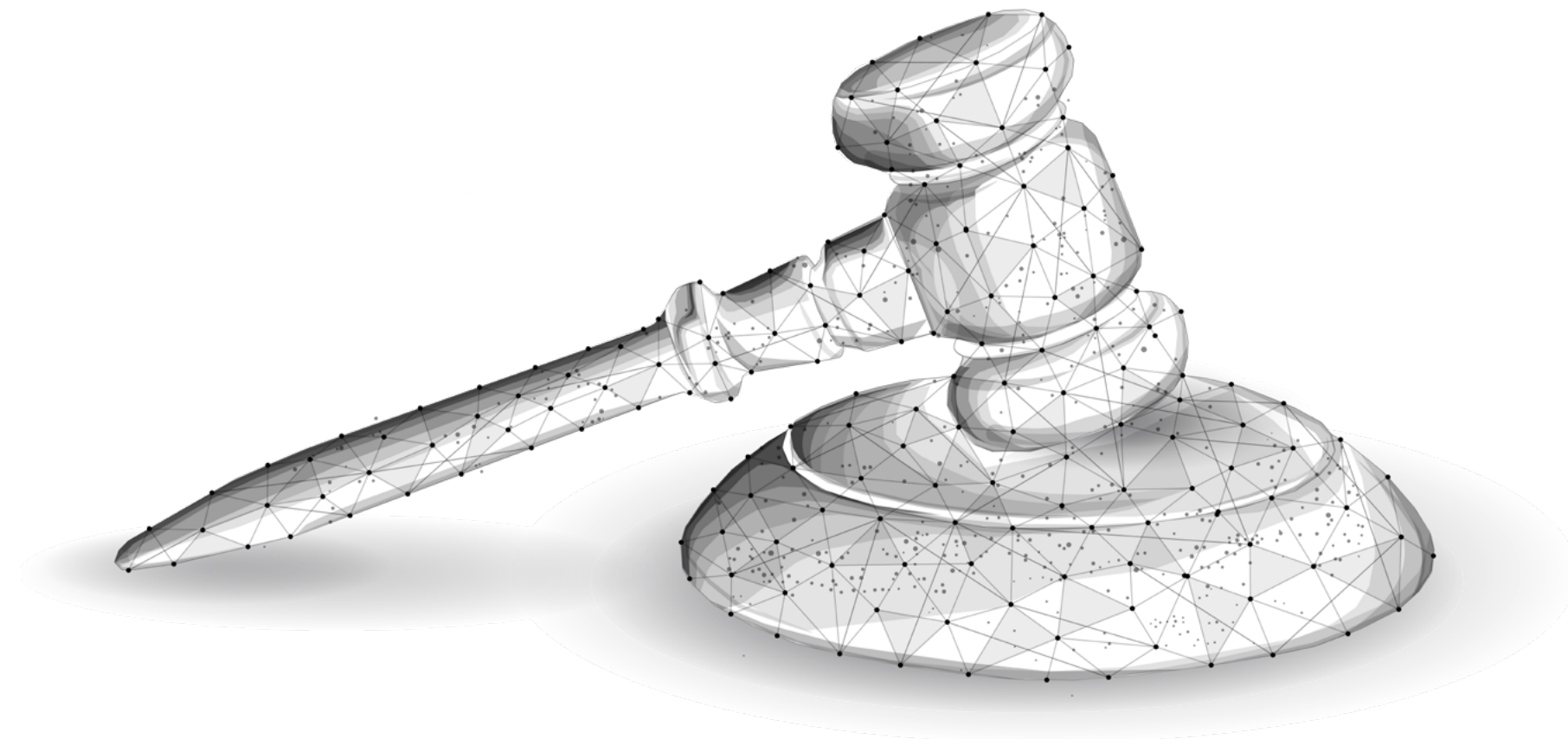
ESG Team

The ESG Committee was established to oversee the systemic integration of a human rights approach across the business, ensuring that harm to people and society are mitigated in compliance with the UN Guiding Principles on Business and Human Rights.

The ESG Committee comprises leaders and directors from various business units including Governance, Risk and Compliance, Human Resources, Finance, Sales, Key Accounts, as well as the company's Chief Executive Officer (CEO).

The Committee is led by an independent human rights expert and holds monthly meetings, as well as ad hoc meetings, to address emerging issues. Separate from the ESG Committee, there are dedicated working groups to develop, address and execute specific topics. These include the Ethics Working Group, the Compliance Working Group and the Environmental Working Group.

Ethics Working Group:

- **Monitor and ensure compliance with Cybolt's Code of Ethics** and related policies, such as the Non-Discrimination Policy.
- **Promote and maintain Cybolt's ethical standards** across all operations and processes.
- **Provide training and awareness raising programs** on ethical conduct.
- **Support Human Resources** in the successful implementation of the Diversity, Equity, and Inclusion strategy to foster a more inclusive and ethical workplace.
- **Oversee the design, development and implementation** of the philanthropy strategy.

Compliance Working Group:

- **Develop and implement compliance procedures,** including anti-corruption, anti-bribery, data protection and privacy, handling of third-party data requests, and more..
- **Develop and optimize tools** to streamline reporting processes, enhancing the efficiency and accessibility of compliance activities.
- **Design and deliver awareness** campaigns and training sessions to ensure staff are well-informed and prepared to follow established procedures.
- **Promote a culture of compliance** through regular updates and engagement initiatives.
- **Periodically review and update compliance procedures** to reflect changes in regulations, industry standards, and internal needs. Collaborate with other departments to align compliance efforts with business objectives and risk management strategies.

Environmental Working Groups:

- **Coordinate and manage initiatives** to ensure Cybolt's sustainability and environmental responsibility efforts.
- **Develop and implement strategies** to mitigate negative environmental impacts and move toward carbon neutrality.
- **Promote internal sustainable practices,** , such as recycling, circular economy models, and carbon footprint reduction.
- **Regularly assess Cybolt's environmental practices** and seek opportunities for improvement in efficiency and positive impact.
- **Engage employees and stakeholders** in fostering a culture of environmental awareness and responsibility.

The ESG Committee and the working groups work together:

- **Monitoring and manage cases:** Oversee and supervise cases reported through the **Compliance Portal**, ensuring timely investigations and resolutions. Analyze trends in reported cases to identify systemic issues and recommend preventative measures.

- **Reporting and ensure accountability:** Provide regular reports to senior management and the ESG Committee on governance, social responsibility and environmental activities, highlighting results and areas for improvement.

Mechanisms for reporting concerns

Cybolt offers a variety of options for stakeholders to submit comments and file complaints regarding the company's ESG policies and procedures.

Compliance Portal

Description:
Use the Compliance Portal to report any suspected violations of Cybolt's ESG policies, including issues related to law, our Code of Business Conduct, or policies on human rights, the environment, corruption, or misuse of technology.

The portal site is managed by an external entity. The ESG Committee will document your report and conduct an assessment to determine whether it relates to a plausible compliance issue and whether an investigation is warranted. If your report meets the admissibility criteria, further investigation will be recommended. If a violation is determined to have occurred, appropriate action will be taken including actions to improve our processes and prevent future incidents.

Who can use it?
Anyone who has a business relationship with Cybolt, including but not limited to employees, customers, partners, suppliers, investors and end users.

Where can I find it?
The ESG page on the Cybolt website (https://digital.cybolt.com/inbox/)

Annex 1 of this document contains an anonymized explanation of the various cases submitted through the portal in 2024:
Compliance Portal Overview

Anonymous Tip Boxes

Description:
There are boxes located around Cybolt offices for employees to submit anonymous notes.

Who can use them?
Cybolt Staff.

Where are they located?
Camera-free strategic points in Cybolt offices (in Metepec, Mexico City, and Monterrey).

ESG Committee Investigations

Description:
Cybolt senior management can directly request investigations or actions for consideration by the ESG Committee. This includes:

• Human rights impact assessments.

• Materiality assessments.

• ESG-related strategies and action plans.

Who can use it?
The Board, ESG Committee Members, BU Leaders

Where can I find it?
Email humanrights@cybolt.com to submit a request.

Preventing operational disruptions and ensuring business continuity

Cybolt has a Business Continuity Plan covering the data center, the Metepec operations center, the SOC, and the support processes they rely on. The plan prioritizes preventing interruptions, given the critical need for service availability. Business continuity strategies have been integrated from the outset, considering location, design, construction, and operations.

Risk Mitigation and Location Strategy
Cybolt carefully selected the Metepec site based on risk assessments to minimize disruptions from natural disasters, geographical impacts, and socio-organizational events. The facility is strategically located away from industrial hazards and in a low-impact earthquake zone. This risk analysis is updated annually using data from the National Center for Disaster Prevention (CENAPRED) and Civil Protection, incorporating potential threats such as cyberattacks, technological failures, and resource shortages

Preventive Measures and Testing
To enhance resilience, Cybolt has implemented the following measures:

• Route Optimization – We work with internet service providers (ISPs) to ensure optimal data routing.

• Redundant Connectivity – Service continuity is ensured through primary and secondary links, supported by multiple ISPs.

• Testing and Validation – Regular testing programs verify the effectiveness of our continuity strategies.

These initiatives not only prevent interruptions but also improve incident response and mitigation. Cybolt continually refines its procedures and trains personnel to respond, react, and resolve disruptions effectively. We are committed to building a strong culture of prevention, recovery, and resilience.

Operational Redundancies
To minimize disruptions, Cybolt has implemented:

• Backup power solutions – Electricity generation plants for use during CFE supply failures.

• Redundant infrastructure – Electrical equipment, UPS systems, and multiple telecommunications links.

• Fire and security controls – CCTV monitoring, access protection, and environmental control systems.

• Training and audits – Ongoing testing and staff preparedness programs.

These measures have effectively mitigated risks, ensuring uninterrupted operations. For example, CFE power outages have had no perceptible impact on users due to redundant electrical systems.

Incident Report: 2024 Telecommunications Disruption
While interruptions are rare, in 2024, a telecommunications issue caused temporary service intermittency:

• Impact: Intermittent access to servers in the data center.

• Duration: 20 hours (from detection to resolution).

This event reinforced the need for continuous improvement in our resilience strategies. Cybolt remains dedicated to strengthening its business continuity framework, ensuring reliable and secure operations for our clients and stakeholders.

Implemented measures:

• We regularly analyze route propagation in collaboration with internet providers to ensure optimal data flow.

• We continuously implement protocols for service continuity, ensuring redundancy through primary and secondary links with the support of our internet service providers.

• We developed and maintain a testing program to validate these measures and ensure their effectiveness.

Building resilience is not just about preventing interruptions—it's about preparing for unexpected events. Cybolt continuously enhances its procedures, staff readiness, and response capabilities to ensure swift resolution of any disruptions. We remain committed to strengthening our culture of prevention, recovery, and resilience.

Anti-corruption and anti-bribery

Addressing anti-corruption and anti-bribery issues is essential to protecting Cybolt's integrity, ensuring legal compliance, and reinforcing trust among customers and business partners. Given the sensitive nature of the information we handle and the high level of trust required in the cybersecurity sector, Cybolt takes a proactive approach to preventing corruption and bribery, fostering an ethical and transparent work environment.

At Cybolt, the Compliance Working Group is responsible for overseeing anti-bribery compliance. This group is composed of representatives from various departments, ensuring a comprehensive and cross-functional approach to compliance. Its key responsibilities include:

- Overseeing the design and implementation of Cybolt's anti-bribery management system.

- Providing guidance and support to staff on bribery-related issues and compliance requirements.

- Reporting on the effectiveness of the anti-bribery management system to senior management, the governing body (if applicable), and other compliance functions.

The Compliance Working Group maintains direct and timely communication with the ESG Committee to address any concerns related to bribery, the anti-bribery management system, and social responsibility.

Data security and privacy measures

Implementing security and privacy measures is our specialty, ensuring that our business partners strengthen their resilience to cyberattacks. Having solid protocols and advanced defense systems helps mitigate the impact of a possible attack, ensuring the continuity of operations.

Our Integrated Management System adheres to strict standards that guarantees the confidentiality and integrity of information, such as ISO 27001 and SOC 2 Type II certifications. We have various policies such as the Client Property Preservation Control Policy, which establishes clear guidelines on the protection of client assets, whether tangible or intangible, or the Policy on Control, Preparation and Classification of Documented Information and Personal Data, which defines criteria for the retention of information and personal data, its classification according to the level of sensitivity and secure elimination once its life cycle in Cybolt has concluded.

In addition to technical security measures, we implement non-technical safeguards to protect data privacy. One key measure is the use of privacy notices, which inform clients, employees, end users, and other data subjects about how their personal data is used, as well as the mechanisms available to exercise their rights. These privacy notices are regularly reviewed to ensure they reflect current data practices, comply with regulatory requirements, and make it as simple as possible for individuals to exercise their rights. This commitment is reflected in our facilitation document, ARCO Rights Format and Revocation of Consent, available on our website, and in our Procedure for Attention to ARCO Rights, which was recently updated to enhance clarity, accessibility, and effectiveness.

In addition, Cybolt's data protection specialist successfully completed the Certified Information Privacy Professional (CIPP/US) training from the International Association of Privacy Professionals (IAPP), providing valuable insights into compliance practices and data protection strategies that will help ensure Cybolt continues to meet the highest standards in data privacy and security.

We have conducted awareness campaigns on personal data protection, reaching 100% of our employees. These campaigns include various activities such as distributing infographics, sharing internal communications, and providing training for new employees. The training emphasizes the importance of protecting both their personal data and that of customers and end users.

During 2024, Cybolt received two requests for deletion of personal data from former employees. Both were fulfilled. For any information request related to Cybolt's use of your personal data, please write to privacy@cybolt.com if you are located in the United States or arco@cybolt.com if you are located in Latin America.

Number of ARCO rights requests in 2024:

Q1	Q2	Q3	Q4
–	1	1	–

26

Certifications and continuous improvement

Cybolt's Integrated Management System (SGIC) is the organization's framework for managing and organizing its documented processes in various areas. The purpose of the SGIC is to ensure that Cybolt consistently delivers products and services that meet customer needs, while maintaining efficiency and effectiveness in each process.

This system encompasses procedures for documentation, monitoring, reporting and continuous improvement, in order to maintain operational integrity and meet both internal and external expectations. Cybolt staff members receive training on how to best use the SGIC upon joining the company, to ensure they have access to all relevant policies, procedures and reporting mechanisms.

Cybolt has adopted ISO standards to ensure the highest levels of quality, safety and compliance in its operations, aligning with international best practices. Cybolt currently has 6 international standards from the ISO family implemented, which are the following:

ESTÁNDAR	SGIC
ISO 9001:2015	Gestión de Calidad
ISO 27001:2013	Gestión de Seguridad de la Información
ISO 20000-1:2018	Gestión de Servicios de T.I.
ISO 22301:2019	Gestión de Continuidad del Negocio
ISO 37001:2017	Gestión Antisoborno
ISO 26000:2011	Gestión de Responsabilidad Social

The Cybersecurity Operations Center

Our Cybersecurity Operations Centers (SOCs) provide access to a centralized team with cloud- based tools that works to monitor, detect, prevent, respond, remediate, analyze, and maintain a company's IT infrastructure and security posture.

Cybolt's SOC in Metepec, Mexico, is a certified Technology Operations Center designed to deliver highly specialized technology, resilience, and cybersecurity services. It functions as a mission-critical data center with co-location capabilities.

The data center utilizes an Indirect Free Cooling system, which leverages the outside air's low temperatures to regulate indoor cooling efficiently. This system reduces energy consumption, lowers operational costs, and enhances sustainability.

Additionally, the data center has earned the Black Seal of Cybersecurity from the International Computer Room Experts Association (ICREA). This certification recognizes compliance with high security standards for data centers, ensuring comprehensive protection against information loss, theft, or unavailability.

In the field of data centers, technical terms are used to describe specific concepts. An example of this is the Tier, which refers to a hierarchy that classifies the availability and redundancy of the systems that are part of a data center. The Tier classification was created by the Uptime Institute and is organized on a four-level scale. In this data center in Metepec mentioned above, there is Tier level III, which has the following main characteristics:

- Fully redundant power systems, ensuring continuous electricity supply during power outages.

- Redundant cooling systems ensure proper operation of equipment.

- Uninterrupted system maintenance, achieved through duplicate infrastructure components.

In 2024, BeaconLab, Cybolt's threat observatory, together with its specialized cybersecurity incident research, detection, analysis, mitigation and response team (CSIRT), achieved recognition as an official member of FIRST (Forum of Incident Response and Security Teams).

FIRST is the world's leading organization that fosters coordinated and collaborative responses to cybersecurity incidents and aims to promote an increasingly secure international digital environment and stimulate rapid response to incidents. This membership marks an important milestone in our commitment to security and places us within a globally prominent network in incident management.

Beacon Lab actively monitors new threats, including critical vulnerabilities and new attack techniques relevant to the context, both in Mexico and the world in general. In this effort, alert bulletins and original articles are regularly published. In 2024 alone, more than 70 critical alerts were issued, with a reach of more than 7,000 regular subscribers. It is important to highlight that the alerts are directed not only to clients but to the general public; anyone can subscribe to these bulletins at no cost.

Since its creation at the end of 2023, the Beacon Lab has responded to more than 20 critical cyberattacks of various natures: ransomware, server compromise, data leaks, phishing and scam/extortion schemes, among others. Some of these cyberattacks have allowed us to identify and analyze the behavior of previously unknown groups, such as the Red Ransomware Group. This research was even presented by Beaconlab in specialized forums, as part of an original publication.

In addition, by joining FIRST, we have increased our active participation in international conferences and seminars on incident response and red team topics (FIRSTcon, Blackhat, Defcon, Ekoparty, etc.). In October 2024, we participated in the FIRST Latin American regional meeting in Paraguay as exhibitors, with two technical talks.

LOOKING AHEAD

Conclusion

Throughout this year, the company has strengthened its commitment to environmental sustainability and social well-being through various initiatives. We have identified our primary sources of carbon emissions, promoted inclusion and diversity within the organization, and restructured our governance practices. Despite our progress, we recognize the need to further enhance key areas, such as improving energy efficiency and strengthening inclusive labor policies.

During this period, we successfully increased urban solid waste recycling by more than 50% compared to the previous year and improved our electronic and electrical waste disposal processes. However, it remains crucial to stay focused and accelerate our transition toward a more sustainable and energy-efficient company.

On the social front, we have expanded our corporate responsibility programs, reaching over 350 people through educational and health initiatives. The inclusion and well-being of our community remain top priorities, reflected in our strengthened diversity and equality policies. We are committed to further enhancing our professional development and social well-being programs.

Our next steps include intensifying efforts to optimize natural resource use—a key pillar of our ESG strategy—conducting a more precise analysis of our Scope 3 carbon footprint, implementing additional programs to enhance employee well-being, and deepening our understanding of responsible governance principles. To achieve this, we will set new short- and medium-term objectives, ensuring our actions align with international standards and stakeholder expectations.

Acknowledgements

We would like to express our sincere gratitude to all the teams, including the Environmental, Compliance and Ethics working groups, the ESG Committee, the Business Unit leaders and all the stakeholders who have contributed to the preparation and success of this ESG Report. Without their dedication and continuous effort, we would not have been able to advance our commitment to integrate environmental, social and governance principles into our corporate strategy.

ANNEXES

Annex 1: Table of results of the cases handled through the Compliance Portal

Caso #	Date Submitted	Category of allegation	Entity*	Anonymous?	Duration of the investigation	Admissible	Result	Impact
24001	March 12	Favoritism	N/A	Yes	N/A	No	The person against whom the accusation was made left the company.	N/A
24002	March 15	Data protection	GTC	No	150 days	Yes	Case closed: The data deletion request was successfully completed.	Strengthened the procedure for managing personal data requests by creating an ARCO rights manual. Development of an additional course on personal data protection.
24003	June 26	Unfair procedures	GTC	No	43 days	Yes	Case closed: No violations found.	Human Resources now ensures that immediate supervisors are present during all terminations and includes a third person for support when necessary. The group is kept small to ensure a professional and non-intimidating environment.
24004	July 27	Discrimination	GTE	Yes	20 days	Yes	Case closed: There was credible evidence that the individual had acted in violation of the Code of Ethics on multiple occasions.	The company decided to end its relationship with the employee.
24005	August 23	Working conditions	N/A	Yes	N/A	No	No evidence or contact information was provided to request further evidence.	The main concerns expressed were shared with the leadership for reflection.
24006	December 16	Abuse of power	GTE	Yes	TBC	Yes	Open Case: Investigation is ongoing.	In progress.
24007	December 17	Discrimination	GTE	No	TBC	Yes	Open Case: Investigation is ongoing.	In progress.

GTC: Compliance Working Group   **GTE:** Ethics Working Group   **GTA:** Environmental Working Group   **NA:** Not applicable   *Entity investigating the case

Annex 2: Outline of cases handled through the Compliance Portal

The following information is a visualization of <u>Annex 1</u>.