

# **CYBOLT's HUMAN RIGHTS POLICY**

Code: PC-ESG-01  
Revised: September 2023



“At Cybolt we dedicate our work to establishing and maintaining the trust of our clients by identifying, preventing and neutralizing risks. In light of the many revelations about the misuse of technology, moving forward, we are making a commitment to better ensure that our knowledge and technologies are used in a way that do not put fundamental human rights at risk.”

A handwritten signature in black ink, which appears to read "Luis", is written over a large, faint orange circular watermark that contains a stylized "B".

---

Luis Adrián Gómez  
-  
Chief Executive Officer  
of Cybolt

## Our Commitment

Technology should be used to empower individuals, communities, and society towards the effective realization of all human rights. In line with our company values, Cybolt is committed to using technology to protect our fundamental rights and freedoms. We believe that it is part of our responsibility as a next-generation IT security services provider to not only serve our clients of today, but the future generations to come, which is only possible if we are actively caring for people and the planet.

As an expert team of problem solvers using a preventative protection approach, we need to address human rights and environmental challenges head-on. We are working to set a higher standard for other cybersecurity service providers in North America and beyond, which means being compliant with international standards in addition to abiding by voluntary, moral, ethical and human rights commitments. Our partners and clients need to be able to trust that we have their best interest and the best interest of society at large in mind, which is why we are adopting policies and procedures that ensure we are advancing ideals that uplift human dignity and working for the good of humanity.

Cybolt is committed to respecting the United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles) by conducting human rights and environmental due diligence, working to mitigate any negative impacts of our business operations, and remediating against any unintended harms. In drafting this policy and the resultant action plans for its effective implementation, Cybolt aims to embody the common human rights principles that are laid out in:

- The Universal Declaration of Human Rights
- The International Covenant on Economic Social and Cultural Rights (ICESCR)
- The International Covenant on Civil and Political Rights (ICCPR)
- The Convention on the Elimination of All Forms of Discrimination against Women
- The Convention on the Elimination of All Forms of Racial Discrimination
- The Convention on the Rights of the Child
- The Children's Rights and Business Principles
- The 2023 update on the OECD Guidelines for Multinational Enterprises
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The Children's Rights and Business Principles
- The United Nations Declaration on the Rights of Indigenous Peoples
- The United Nations Declaration on Human Rights Defenders
- The United States' Department of State guidance on due diligence and business and human rights defenders
- Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration)

In accordance with the UN Guiding Principles, where national law and international human rights standards differ, we will always look to the higher standard.

## Scope of Application

This policy was first adopted in July 2022 and will be revised every year to ensure it continues to be fit for purpose. It applies to all employees, contingent workers, business partners, investors, advisors, and clients. This policy is referenced in the relevant Business Code of Conduct that is signed by clients and partners, and is included in employee training materials. The aim is to avoid complicity in human rights violations related to our business operations, products and services.

## Our Rights-Based Approach

### Human Rights

The protection of human rights is a critical part of our more integrated approach to environmental, social and governance (ESG) work. Cybolt will work diligently to develop sensible solutions to advance our values and commitment to respect human rights.

While all human rights are universal, indivisible, and interdependent, Cybolt's human rights work has a particular emphasis on ensuring that our identified salient human rights risks are best mitigated:

**The Right to Privacy** - The right to privacy underpins many of the products and services that Cybolt offers. Cybolt promises to protect the confidentiality of personal data of users, employees, customers or other individuals affiliated with our business. Cybolt also works to ensure that each user has prior informed consent of their data use, including clear information about data processing and storage. We recognize that any limitations on this right must be in accordance with the rule of law, proportional, and necessary for the public good. Our privacy policy and transparency principles are to ensure that privacy is top of mind for all services we offer and all third-party data requests we receive. Cybolt commits to pushing back against excessively broad or extra-legal third-party requests that may impact privacy or freedom of expression, including requests from governments.

**Safety and Security (Online and Offline)** - Security of person includes protection from physical attacks, threats of such attacks, or other severe forms of harassment. Cybolt commits to using technology to create a safer environment for us all, both in the digital and physical worlds. We will not participate in the facilitation of detention, torture, or any kind of violence against any person, particularly human rights defenders, journalists, lawyers, women, children, migrants or political dissidents. We also will not tolerate the "weaponization of information" against vulnerable communities by way of Cybolt's technologies or services.

**Non discrimination** - Cybolt also commits to ensuring that its user data is not being used (by humans or algorithms) to harass or attack people based on characteristics including gender, race, ethnicity, religion, and sexual orientation.

**Right to life** - Cybolt refuses to participate in cyber-attacks against a country's civilian and/or critical government infrastructure by another state or non-state armed group.

**The right to a healthy and sustainable environment** - We take responsibility as a business operating within the context of the urgent climate crisis, and we understand that it is critical to mitigate any potential environmental harms that our operations may cause, or prevent any negative affects they may have on the local or global community. We have developed an environmental policy that establishes the international standards that guide our work on this matter and the steps to achieve carbon neutrality.

## Labor

Cybolt is committed to providing a safe and supportive work environment for our employees, where freedom of expression and the right to association are respected. Harassment, including sexual harassment or gender-based violence, and discrimination of any kind are not tolerated. Cybolt does not discriminate on the basis of race, sex, religion, age, physical or mental disability, sexual orientation, gender expression, national origin, language spoken, political affiliation, or any other characteristic protected by law.

Our People team is responsible for ensuring transparent recruitment process, staff development trainings, and guaranteeing Cybolt's working conditions and wages are in alignment with international standards and best practices. They are spearheading all operations related to promoting diversity, inclusion, equity, and accessibility within the workplace. Whistleblowers that report instances of discrimination or unequal treatment will be protected from any retribution for doing so.

## Ethics & Anti-Corruption

As a company, Cybolt's values include confidence, integrity, wisdom, and collaboration. As stipulated within Cybolt's Ethics Policy, which applies to all employees, partners, clients, shareholders and investors, Cybolt aims to create a work culture that embodies honesty, loyalty and respect. There is a zero-tolerance policy for corruption. Furthermore, Cybolt expands due diligence to root out all forms of corruption, as recommended by the 2023 update on OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

Cybolt remains a politically non-partisan company. Cybolt pledges not to engage in any lobbying activities that have negative human rights implications. We also pledge to not deploy technologies that may result in denial of access to government services, including denying the right to vote or affecting electoral outcomes.

## Our Human Rights Actions

### Conducting Human Rights Due Diligence

We commit to identifying and addressing the most salient human rights risks that are affiliated with Cybolt's business operations. We will conduct risk analyses with products or business relationships that may be considered "high-risk" for the misuse of the technologies or services we offer and will take measures to mitigate any risks if it is deemed that the business relationship should continue. As part of human rights due diligence, we will identify, investigate, and mitigate negative human rights impacts of our own activities as Cybolt or those which may be directly linked to work carried out for our business relationships..

## Raising Standards and Strengthening Business Relationships

While it may not be possible to fully control our partners' or clients' approaches to business and human rights, nor fully know the extent of their business operations, we will not support or tolerate our services being used in a way that violates human rights. Whenever Cybolt receives an offer or request, we will assess individually whether partners' or clients' activities might harm human rights and extend recommendations to them when possible.

Given the technologies that we use and the services we provide, we strongly and firmly prohibit our partners or clients from using Cybolt's resources to threaten, intimidate, or attack others. We aim to raise awareness of our human rights approach and efforts with those we have business relationships with, and we require that all contracts include human rights clauses, whenever we have the leverage to do so.

If we become aware of a concern that our services are being used in connection with abuses of human rights, we will restrict or cease the business relationship until and unless we have a high level of confidence that Cybolt's activities are not linked to a human rights violation. As stipulated in our Business Code of Conduct, we require that our business partners comply with all applicable laws, regulations, and international standards relating to human rights and that we have the right to ask for proof of compliance if there is a suspicion that the Business Code of Conduct is being violated.

## Improving Governance and Accountability

Cybolt's CEO and Chairman of the Board oversee and approve Cybolt's human rights initiatives. An independent consultant is also engaged in advising and strengthening Cybolt's overall approach to business and human rights. There are multiple committees that are in communication with each other in order to assure that the aforementioned rights-based approach is being implemented and continually improving:

- **ESG Committee** – Cybolt's ESG Committee is a cross-functional team of board members and senior-level employees from different strategic departments. This committee works to ensure that all Cybolt employees are trained in foundational human rights principles as well as guarantee effective due diligence concerning the salient human rights risks that are related to the company's business operations. An independent expert is responsible for facilitating the committee's response to all denouncements or requests brought forth.
- **Ethics & Integrity Working Group** – Cybolt's Ethics and Integrity Working Group is in charge of the Ethics Program, which works to best ensure that the principles of legality, integrity, efficiency, impartiality, transparency and zero tolerance for corruption and bribery are respected. The committee comprises of 15 employees that apply through an open call for applications, and the president of the committee serves a rotational term lasting 2 years.
- **Environmental Working Group** – Cybolt's Climate Action Working Group builds policies, action plans and training programs that focus on the right to a safe and healthy environment, but also to ensure we are doing our part in light of the global climate emergency. This committee comprises key team members that have the skills and knowledge of Cybolt's infrastructure in order to both offset carbon emissions and minimize energy consumption.
- **Compliance Working Group** – Cybolt's Compliance Working Group ensures that the company adheres to regulatory requirements, industry standards, and internal policies, mitigating legal, operational and ESG risks while promoting rights-respecting business practices. It oversees



compliance assessments, monitors internal controls, and advises on necessary adjustments to maintain the company's integrity and legal standing.

We recognize that human rights and environmental risks can evolve rapidly. Cybolt commits to taking action in good faith and improving our practices over time to accelerate positive outcomes for people and the planet. For more up-to-date information about our initiatives related to human rights, climate action, ethics, and anti-corruption, please visit the ESG page on our website.

## Transparency in Monitoring and Reporting

Cybolt commits to publishing annual human rights reports where we communicate about our goals, progress, and overall performance. This includes information concerning privacy and transparency reporting related to third party data requests. Cybolt's ESG Committee has set clear indicators to assess the implementation of this policy and pledges to respond promptly and effectively to any inquiries related to issues considered to be salient human rights risks.

## Providing Access to Remedy

We commit to engaging with affected stakeholders and collaborating in initiatives that seek to provide access to effective remedy where Cybolt's business operations have caused or contributed to a human rights violation. For cases that involve the products of Cybolt suppliers, we will work to facilitate access and use of their existing human rights mechanisms. Cybolt strictly prohibits any form of retaliation against those who choose to raise human rights-related concerns, and ensures that whistleblowers can raise complaints without any fear of retribution.

Cybolt is committed to providing effective grievance mechanisms and we will work to ensure that all staff and affiliated parties are aware of these mechanisms. We will proactively notify users when we believe a harm has occurred in order to facilitate any necessary action. We will also work to facilitate remediation for anyone who provides evidence of adverse impacts concerning Cybolt-affiliated artificial intelligence systems.

Those who have concerns about human rights related issues, or have any questions related to this policy, may submit an inquiry in English or Spanish to an independent human rights expert via [humanrights \[a\] cybolt.com](mailto:humanrights@[cybolt.com])

Those who have concerns about ethical or anti-corruption related issues may submit an inquiry in English or Spanish to [denunciaetica \[a\] cybolt.com](mailto:denunciaetica@[cybolt.com])

Any issues related to a violation or potential violation of Cybolt's ESG policies can utilize the secure reporting platform on our website, which is managed by an independent third party.



[cybolt.com](http://cybolt.com)