

CODE OF ETHICS

REVIEW MAY 2026

INTRODUCTION

The Code of Ethics and Conduct of General Business Machines Corporation and its subsidiaries (hereinafter “GBM” or “the Company”), sets forth the commitments and ethical and behavioral responsibilities that employees, Board of Directors, committee members and third parties with whom the Company interacts must comply with in the execution of operations and relations with all our stakeholders.

Unethical conduct or behavior by any of the participants in GBM’s business compromises its relationships of trust and may result in hostile situations detrimental to the corporate reputation and interests of the Company.

Everyone who works at GBM must conduct his or her actions in accordance with the language and substance of this Code and avoid behavior that gives the appearance of impropriety.

OUR STAKEHOLDERS

- Board of Directors
- Committee members
- Government and regulatory entities
- Clients
- Employees
- Suppliers
- Business partners
- Comunity and society

OUR CORPORATE PHILOSOPHY

VISION

“To be the best IT solutions provider for our customers, to improve their competitive position, seeking to double the size of our business and profitability in 5 years, in an optimum, innovative and collaborative environment with the communities where the company operates”.

MISSION

“To integrate technology in value added solutions, satisfying the expectations of our customers, through qualified and engaged professionals, with world-class methodologies, products and services”.

VALUES

- **RELIABILITY** to be honest, with integrity and loyal, executing our commitments with high quality, precision and on time.
- **COURAGE** synonymous of daring. To be more authentic, persistent and productive.
- **DISCIPLINE** observance and compliance with the rules and commitments.
- **TRANSPARENCY** to be clear, evident and with no doubt and ambiguity.

ABOUT THIS CODE OF ETHICS

At GBM we practice our values every single day, as well as our commitment to conduct business with ethics and with integrity; whether it corresponds to internal or external affairs.

GBM's Code of Ethics comprises a group of scenarios which should be addressed when making commercial decisions, as well as when solving problems arising during the execution of your job. It is absolutely critical for all employees to comply with ethical standards; as our own personal vision and when facing customers, partners and shareholders.

This document is intended for GBM's and subsidiaries' employees, trainees, scholarship students, and is extended to third parties with which the company relates. Yearly, all employees must confirm, through the signing of the Certification of policies, that they know, understand and accept the obligation to comply with the rules in this code, Also, if necessary, an employee will denounce and collaborate with the investigation processes on possible breach or non-compliance with the policies.

If you have any concerns on your actions, or you consider our code is being violated, please ask yourself these questions and proceed to report this through the official channels.

- Is this an legal or lawful action?
- Does this comply with GBM policy?
- Does this comply with GBM values?
- What would happen if everybody would know the situation?

CODE'S PRINCIPLES

One way to protect GBM and our co-workers and the individuals depending on us, is to report problems related to integrity. Related to the obligations, please bear in mind following principles.

REPORT IMMEDIATELY

The more delay in confronting a situation, the more complicated the resolution.

YOU COULD KEEP YOUR PRIVACY

However, if you choose to identify yourself, we will follow-up on the case and provide a response.

CONFIDENCIALITY IS RESPECTED

Your identity and personal information will only be revealed if it is strictly necessary and only to the individuals in charge of resolving the case.

RETALIATION IS AN INFRINGEMENT

It is totally prohibited to retaliate against any individual reporting on a problem or raising a concern related to integrity. Retaliation is a cause of disciplinary sanction that could even be a cause of termination.

ACTING RESPONSIBLY

GBM has a Compliance Officer, who is in charge of receiving complaints about non-compliance and/or violations of this Code, under the Investigation and Remediation Protocol.

Said Protocol establishes the rules, instances and times under which they manage the reported cases, which protect the principles of immediacy, anonymity and confidentiality, present in this Code.

Modifications to this Code and the Investigation and Remediation Protocol are proposed by the Compliance Officer and approved by the GBM Risk and Compliance Committee.

If you have any questions or complaints related to our code, please contact us:

- **E-mail:** etica@gbm.net
- **Complaint channel:** https://denuncias-gbm.mira.cr.
- **Web form:** https://www.gbm.net/etica
- **In person or via corporate digital channels:** The complaint may be submitted to the Human Capital Regional Manager or the Compliance Officer, either in person or using authorized institutional platforms (such as Microsoft Teams or corporate email).
- **Corporate call center:** (506) 2504 - 4500.

In case of using this last channel, ask to be communicated with the Human Capital Regional Manager or Compliance Officer.

References: Investigation and Remediation Protocol

CHAPTER I

OUR WORK ENVIRONMENT



Your workplace could refer to your office at GBM, at the customer's location or your house. No matter where you are, you probably have to interact with coworkers at GBM or with confidential information, intellectual property and other valuable assets. For this reason, your conduct must be guided by ethics whether it is a direct communication, by telephone, internet or any other means.

GBM's prestige is based on a high degree of mutual trust and responsibility between the employees and the Company. Its foundation is the understanding that you, as an individual, will act according to this Code of Ethics. An Ethical conduct at work means, essentially, an honest and equal treatment to other coworkers, customers, suppliers, competitors and the public. It is not an overstatement to say that the integrity and prestige of GBM are in your hands.

Respect for the individual has led GBM to have strict consideration for privacy and dignity of every employee. However, when the Compliance Officer determines that your personal conduct, whether it is off or at the job, negatively affects the performance, integrity, dignity or your own or other coworkers, or the legitimate interests of the Company, said conduct will be a matter of GBM's concern.

RESPECT FOR HUMAN RIGHTS

Beyond physical conditions, such as a clean and safe workplace, GBM strives to provide employees with a healthy, safe and productive working environment. At the same time, this environment should be free of discrimination or harassment, like prejudice against race, skin color, religion, gender, age, citizenship, sickness, impairment, sexual orientation or marital status. In other words, GBM will not accept comments, mockery or jokes, or any discriminatory behavior which could cause a hostile work environment. These actions are totally opposed to the interests of the Company.

These acts are completely opposed to the interests of our company, and GBM issued a document "Policies for employees' disciplinary process", where the implications of no compliance are specified.

GBM is against any kind of stalking or harassment to coworkers, either by management or peers. A respectful and dignified treatment among coworkers, customers and suppliers is an expected and promoted behavior at GBM.

Other prohibited conduct, which derives in a negative working environment are:

- Threats or violent, disrespectful, demeaning or mobbing behavior.

- To watch, bring or share pornographic material.
- Sexual harassment or sexual stalking.
- To be in possession of firearms without the direct authorization from the administration.
- Inappropriate use of recording equipment (including cellphone cameras or webcams.).
- Romantic relationships between the manager and the direct or indirect employee.
- Intimate relationships, or signs of affection that could be interpreted as sexual intentions among coworkers, with customers or suppliers.
- Using, distributing, selling or be in possession illegal drugs or any substance, except as prescribed by a medical doctor.
- To be at the workplace under the influence of alcohol, illegal drugs, enervating substances, only those prescribed by medical doctor.
- Alcoholic beverages are only authorized at the workplace with the approval from General Managers and/or Directors in events promoted by the Company.
- In any situation in which the employee represents the company, whether in local or international events, meetings, trainings or other activities, he/she must maintain a responsible consumption of alcoholic beverages, avoiding any excess that may compromise his/her personal and professional image, as well as that of GBM, always prioritizing safety and respect for others.
- The employee is expected to act at all times in a professional manner and in line with the company's values. The abuse of alcoholic beverages or any inappropriate behavior related to its consumption could be considered a serious offense and may result in disciplinary measures, as established in the Policy for the Employee Disciplinary Process.
- Smoking cigarettes of any kind, both conventional and electronic, as well as the use of vapes, is prohibited within GBM´s facilities and/or in company-organized activities, except in designated areas.

For all purposes, GBM's premises also refer to the surrounding areas, which GBM uses or rents for the organization of events, such as: training, promotion with companies, parties of the Company, etc.

Also, if GBM determines that your conduct inside and outside the Company, negatively affects your performance, of another coworker or the commercial interests of GBM, you will be subject to a disciplinary

action, which could include the termination of your job.

EMPLOYEES PRIVACY

GBM gathers and preserves information about your work relationship. This includes medical and benefits information. Access to this information is strictly reserved for individuals who should know it and it is only revealed outside GBM or its agents with the contentment of the individual, only when verifying hiring information or for legal requirements or investigation. Personnel in charge of preserving the information and the ones with access to this information must ensure not to publish it, since this is a violation to the practices and policies of GBM.

HOME OFFICE POLICY

GBM in its commitment to constantly update and generate efficiency and well-being for its employees, sets forth a program of flexibility, allowing the option of home office, when applicable for the position and responsibilities; as long as and when the employees respond to the program with responsibility, so that it can be sustainable and does not impact productivity or service.

Employees, during their time working in home office mode, will have same obligations, responsibility, and working hours as when working at a GBM's site. Among others:

- During working hours, employees must be connected to all communication means used in the Company. To mention some of them, MICROSOFT TEAMS, WEBEX TEAMS, ELECTRONIC MAIL, MOBILE PHONE, and in such a place that has optimal connection, as well as any other means of communication which may be required in the future, in order to interact with co-workers and customers, and keeping full accessibility.
- Home office work depends on the responsibilities of the employee, some meetings require physical presence, in case of being requested to attend corporate events (kick off, quarterly meetings, in-person meetings) and if the employee does not attend, it is a cause of interruption of home office mode, as well subject to sanctions as applicable.

Reference: Home Office Regulation Policy.

CHAPTER II

OUR INFORMATION AND RESOURCES



At all times, we have the responsibility of responsibly using the assets provided by GBM, as well as for the correct use and publication of managed information, in order to protect personal security and external security of the company. Also, to respect and seek for the company's protocol compliance, for image management and for external communication.

CONFIDENTIAL INFORMATION AND COPYRIGHTS

Private information, property of GBM, its suppliers and commercial partners, is handled according to the information classification of the Company (public, GBM internal use, restricted and confidential). This information includes commercial plans, financial, strategy, marketing, as well as personal information, medical history and information on compensation.

As an employee, you probably have access to Company information which is considered restricted, confidential, or internal use. For this reason, it is very important that you do not reveal or use the restricted, confidential, or internal use, unless it is authorized by GBM and with the corresponding precaution to avoid exposure of said information.

It is also, your obligation, not to publish any confidential information, restricted and of internal GBM use to external individuals to the Company. You, as an employee, should use this information to conduct your activities at GBM. These are your obligations which are in force in all countries where GBM operates, whether you are the person who created the information or not. This continues, even when the individual is no longer a GBM's employee, since the individual is not authorized to publish or use confidential information of the company, suppliers and commercial partners which were accessed when he/she was a regular employee.

If you have access to confidential information or restricted information related to your position in the company, you should avoid publishing such information, even internally, if you do not have authorization to do so. Examples of confidential information: changes in salary structure, hiring, termination, sanctions, mergers, acquisitions or sale of a part of the business, changes in policies and procedures, information on benefits or working conditions, etc.

The copyright for any development of your ownership, is property of GBM. However, if you consider that your idea or your invention is not on the frame of this Code, you could request the Compliance Officer, who will reply accordingly. If a disagreement arises on intellectual property, you should request

your manager, before you distribute the material to GBM through any channel, and your manager is in obligation to ask a legal counselor in order to obtain an authorization to include the material in a particular channel.

References: Certification of Ethical Behavior, Confidential Information Agreement, Declaration for Computer Equipment (Assigned by GBM), Declaration for Computer Equipment (personal equipment), GBM Equipment Mobilization Certification, Vehicle Assignment contract GBM, Rental vehicle assignment, Clean Desk Policies, Information Security policy.

ACCIDENTAL DISCLOSURE

Accidental disclosure of confidential information, restricted or internal use, could be as damaging as the intentional. To avoid this situation, never talk to unauthorized parties on GBM's confidential information if you are in presence of third parties, for example, in a commercial presentation or in a public place, as a plane, airport, restaurant or bar.

Same principle applies to conversations with family or friends, which could pass information without intention or inadvertently to third parties. Do not forget that any disclosure could be damaging, it could start with the most insignificant divulgation of information. Small fragments of information that you disclose, could be associated with fragments from other sources and then conform a very complex base.

References: Clean Desk Policy

INFORMATION REGISTRATION AND REPORTS

You must ensure to register and report information adequately and accurately. Any false registry or modification of documents could be subject to sanctions. For example, a Human Capital Analyst registers a payroll, a Finance Analyst registers income and expense, and an accounting analyst registers accounting records and a technical representative completes worksheets for service calls. Expense reports constitute an important registration. GBM reimburses expenses which have been used effectively and reasonably. To submit and approve expense reports for non-consumed meals, non-traveled kilometers, unused airline tickets, not your vehicle gas or any other expenses not made, is a violation of corporate policies.

These are some of the dishonest and violating examples to the norms in this Code, and which will cause sanctions at work and legal consequences

References: Employees disciplinary process Policy

COMPROMISES AND APPROVALS

GBM approval processes are designed to help in protecting your assets and keeping proper controls to perform our business efficiently, with customers, business partners, channel suppliers or even at GBM's premises.

Authorization for Pricing, terms and conditions in contracts, privileges or benefits for employees, among other actions, are delegated to certain positions and only those positions can authorize, according to each role. Compromising without following processes, outside delegation limits or without corresponding approvals, through secondary agreements or not, is not acceptable. Do not engage in spoken commitments creating a new agreement or modifying an existing agreement with a third party without the approval, according to delegation levels established in the Smart&Simple – Finance Procedure.

ACCESS TO THE ASSETS, SUPPLIES AND SYSTEMS

Equipment, systems, installations and materials of GBM's property, should solely by used to carry out the commercial activities or other activities authorized by the Company. Personal goods, messages or information which you consider private should not be left at your office, at the working areas, desks, cabinets, files or systems. GBM could have access to the areas when considered necessary according the clean desk instructions.

Many employees handle equipment which use supplies property of GBM. The supplies are easily available at the offices of the Company. However, employees should not use the supplies for personal use since this is a non-compliance of this code.

Internal information and communication systems are having an increasing relevance in GBM's business conducting; therefore, it is necessary to grant its integrity. As any other assets, systems and the information, must be used only for conducting of the business, its use, without the authorization, for profit or not, is a misappropriation and will have legal and labor sanctions. GBM conducts routine audit procedures to help in controlling the adequate use of systems, networks and databases of the Company, but it is the responsibility of the employee to ensure that every time he or she uses any of the systems, it is done following the norms established by GBM.

Employees using personal devices to carry out a job at GBM, must be ruled by the Policy Política Bring Your Own Devide (BYOD).

References: Clean Desk Policy, Declaration of Understanding of Computer Equipment (Assigned by GBM), Declaration of Computer Equipment (personal equipment), Smart&Simple – Finance Procedure.

REGISTERED TRADEMARKS

As many other companies GBM owns registered marks, words, names, symbols or designs used to identify and distinguish the Company and its products. It is important that you handle the brand correctly.

GBM and commercial Brand of other companies. To obtain orientation on the appropriate use and recognition of GBM and certain third party brands, please consult at the Marketing department.

References: GBM's Brand book.

CHAPTER III

OUR COMMERCIAL MANAGEMENT



Ethics and law must be present in all commercial transactions, either buying or selling or representing GBM. Your communication, conduct and agreements with suppliers, competition, customers, channels and other people could directly affect the reputation of the company and compliance with the law.

At the present time GBM keeps a commercial relationship with a series of organizations, with which, sometimes it establishes more than one type of relationship. For example, a company and customer of GBM could be its supplier or competitor, no matter what type of organization we keep a relationship with, or any type or relationship with GBM, must respect always following general norms:

FAIR TREATMENT

Any individual or organization, with which you stablish a commercial relationship has the right for a fair and equal treatment, no matter the relationship established with it, either buying, selling or any other way. This declaration cannot be detrimental to the commercial or financial strategies of GBM, in order to achieve its objectives.

If circumstances appear, it is possible to modify the conditions for pricing and services. In such case, modifications must be approved by the responsible management. You cannot present modified conditions to a customer without previous authorization.

In your work, you shall treat all GBM's suppliers with respect.

When you have to decide among several prospects, you shall review all data objectively. Whether you can or cannot influence decisions related to evaluation or selection of suppliers, you shall not exert influence to obtain "special treatment" in favor of anyone in particular. Even the possibility of doing this, could damage the image of integrity of the company and the effectiveness of our procedures. It is essential for suppliers competing for a negotiation with GBM to trust the impartiality of our procedures. This trust could be damaged if the former employees competing as suppliers or representing suppliers might give the impression of receiving insider information or any advantages, due to the position they held in GBM.

References: Purchasing of Goods or Services for Internal Use of GBM, Management for the support of Third Parties. Procedure for the Acquisition and Registry of Suppliers.

FAIR COMPETITION

GBM's policy is based on the merits of products and services and not in the practice of underestimating competitor products or services. It is incorrect to insinuate or miss-declare or make inaccurate declarations which could lead to an error.

RECIPROCITY

Seek reciprocity is contrary to GBM's policies and could be considered illegal. In other words, you should not say to a possible supplier that the decision to purchase its products or services is subject to the reciprocity of acquiring GBM's services or products. To avoid accusations of reciprocity, do not indicate any possible customer that GBM deserves the business in reciprocity to purchases. This does not mean that customers cannot be suppliers of the Company, it only means that the decision from GBM when purchasing products or services to a provider, must be considered independently of the decision from the supplier of buying products and services from GBM.

WORKING WITH THIRD PARTIES

GBM maintains business relationships with third parties for providing proposals and execution of projects. Those are external companies which provide services to final users in the field of IT, and which depend on a consolidated proposal from GBM

If your responsibilities include to contract a third party, you should follow the rules and policies on evaluation and contracting of third parties' subcontractors, suppliers, commercial partners, which describe the appropriate conduct to deal with resellers and authorized assistants to GBM and the reference organizations.

References: Purchase of Goods or Services for Internal Use at GBM, Third party support agreement management.

WORKING WITH THE COMPETITION

GBM does business with a lot of companies, it is important to recognize when a Company with which you are dealing, as a supplier or customer, is also competition of GBM. These situations require your good judgement.

In all contacts with your competition, refrain from discussing about prices, terms and conditions, costs, inventory, commercialization plans, business strategies, services and products and any other information which GBM has classified as confidential, restricted, or GBM internal use.

If your competitor tries to obtain sensitive information from you, either superficially or naively (in appearance), you should decline, stop the conversation and clearly state your competitor that you, under no circumstance, can talk about those matters. If required, you should leave the meeting.

THIRD PARTY INFORMATION

In the regular conduct of business, it is common to gather information from other organizations, including the competition. It is normal to obtain this information and it is not an ethical fault. In fact, GBM gathers this information according to legal practices, for purposes such as credit and evaluation of suppliers. Also, the company gathers information on the competition, from several legitimate sources to evaluate the merit of our own products, services and commercialization means. This activity is appropriate and necessary in a competitive environment.

INFORMATION GATHERING AND USE

There are limits related to the way in which information should be obtained and used, mainly, information about the competition. No Business should use inappropriate means to obtain commercial secrets from competition or other confidential information.

Acts, such as corporate espionage, the theft, intervention of telephone lines, the stealing or bribes, either monetary or payment in kind to a collaborator of the competition, solely to obtain confidential information is prohibited. Search for confidential data among the employees from the competition is an incorrect and unethical practice. GBM will not permit any act that could lead to corporate espionage.

Information on other companies should be managed with discretion and secrecy, since it refers to individuals and the companies have the right to care for the reputation and privacy of its personnel. Adverse information, with no commercial

purpose, should not be revealed or used. When handling sensitive information on other company, you should use it in the appropriate context and solely to provide it to GBM's employees requesting such information. When handling the information, you will only reveal the name of organization or individuals if necessary. If not necessary and does not add value, refrain from doing it.

INTELLECTUAL PROPERTY AND THIRD PARTY CONFIDENTIAL INFORMATION

Organizations and individuals own copyrights they need to protect or in certain occasion they could disclose the information for a specific purpose. If you are the person who will receive information from the other party, it is important to please proceed with caution to avoid GBM to be accused of using or to illegally obtain confidential information from third parties. To avoid this risk, there are certain steps you must follow:

- Receiving of confidential or restricted information should not proceed until the terms and conditions for this information have been formally agreed between GBM and the other party, by signing a non-disclosure agreement approved by the legal advisor.
- Once you are in possession the confidential or restricted information from the other party, you should use, copy, distribute or publish such information only as established in terms of that particular agreement.
- If you believe information might be confidential for a third party or that its use could be restricted, ask GBM's legal advisor.

PERSONAL INFORMATION

As part of your job, you may have access to personal information on consumers, client employees, suppliers and others. You can only use the information as required to comply with your assigned job responsibilities. You cannot use or alter personal information inappropriately or disclose with any other individual without a legitimate need to have such information. If you consider that database on individuals have been provided, stolen or lost, you must report to the Compliance Officer.

A clear example is the database for mass mailing, where GBM compromises from subscription and in each mailing, to respect the use of data, according to this agreement "you can, at any time, ask to be eliminated from receiving bulletins or electronic information. GBM will not share or sell any personal information or email addresses".

BRIBES, GIFTS AND COURTESIES

GBM strictly prohibits bribes and facilitation payments of any kind.

The following are strictly prohibited: bribes and other undue inducements offered to public officials, customers, suppliers, strategic allies, other persons or entities with whom there is a business relationship or any other person or entity.

In any case, GBM's Anti-Corruption and Anti-Bribery Policy must be observed.

Reference: Anti-Corruption and Anti-Bribery Policy.

Neither you nor a member of your family can ask or accept a supplier or a customer, money or gifts which are or could be understood as related with the commercial relationship with GBM and the supplier or customer. Gifts include not only material goods, but also services, promotional material or discounts in personal acquisition of articles or services.

GBM Members may give, pay or accept gifts, hospitality and entertainment, travel or accommodation expenses, provided they are given, for lawful and customary business purposes, in the understanding that local law so determines. If you are offered money or gifts, or if they arrive at your home or office, report it immediately to the Compliance Officer. In such a case, arrangements will be made to return or dispose of what has been received and the supplier or customer will be reminded of GBM's policy on gifts.

GBM does not allow you to offer payments in currency under no circumstance. You cannot offer gifts to any employee of a supplier, customer, governmental organization or other if when doing this you are compromising the commercial relationship.

In cases of uncertainty regarding the acceptance or giving of gifts or benefits, employees shall promptly report such matters to the designated Compliance Officer.

WITH THE PUBLIC SECTOR

What could be considered acceptable in a private commercial environment, such as training, transportation, entertaining or other value, could be completely unacceptable and even illegal when it relates to public employees. In consequence, you must be alert and comply with the laws and regulations applicable to commercial relationship between public administration and suppliers. As a general rule, during the process of acquisition in a public institution, you cannot attempt to influence decision

on the participant employees, even those representing a governmental institution.

Specifically, during an acquisition process in the public sector, you cannot conduct following activities directly or indirectly:

- To analyze or to offer a job or business opportunities which could benefit public employees or family members in the purchase.
- To offer or provide gifts.
- Request or obtain private information.

In addition, GBM should apply and adhere to the legal restrictions in place, as related to the hiring of former public employees, which participated, in person or in substance, in representing the government, in a process of acquisition You should ask the management and the legal advisor before you attempt to hire such resources.

SALES TO THE PUBLIC SECTOR

Sale to the public sector considers the specific regulation to which GBM and its employees must adhere. Do not discuss business or opportunities which could benefit you personally to any member of acquisitions in the public sector during the acquisition active or foreseen and should not offer or provide gratifications or promises in relation to an acquisition activity. Before you contract an agent or consultant for the hiring of public sector and ensure that when doing does not create a conflict of interest.

You should adhere to these rules, as well as the law. Report to the Compliance Officer immediately on any violation or risk of noncompliance.

THE ENVIRONMENT

GBM will comply with all environmental law existing in your operating country. GBM has also, the commitment to reduce impact to the environment, to the extent possible, on own emissions, on residue management, on the reduction of toxic materials, energy saving and hydric resources.

GBM's employees have a very important task in protecting of the environment. As an employee, you have the obligation to inform on any situation which could be considered an environmental risk, real or possible, in our premises or linked to the providing of our services, mainly if it contravenes any national legislation.

References: Corporate Responsibility and Sustainability Policy.

ZERO TOLERANCE FOR TERRORIST FINANCING AND MONEY LAUNDERING

GBM will take all pertinent measures to prevent, avoid, impede and condemn terrorist financing and money laundering behaviors. We promote a culture of zero tolerance face to corruption and illicit acts.

References: : Anti-Corruption and Anti-Bribery Policy

CODES OF CONDUCT FOR BUSINESS PARTNERS

All GBM employees have the obligation to know, understand, and comply not only with this Code of Ethics and the Company's internal policies, but also with the codes of conduct, integrity policies, compliance guidelines, and applicable ethical standards of the business partners, suppliers, and third parties with whom they interact in the performance of their duties. In this regard, they must ensure that their actions are consistent with such regulatory frameworks, avoiding any conduct that could result in non-compliance or create legal, reputational, or integrity risks for GBM. Furthermore, it is the responsibility of each employee to be adequately informed about the applicable requirements of each counterparty and to observe them in all business relationships.

The codes of conduct of our main business partners can be consulted at the following links:

Cisco

https://www.ttc.cz/wp-content/uploads/2025/04/Partner-Code-of-Business-Conduct-PCoBC-January-2025.pdf

IBM

https://www.ibm.com/downloads/documents/mx-es/10a9980400afd135

Microsoft

https://cdn-dynmedia-1.microsoft.com/is/content/microsoftcorp/microsoft/mscle/documents/presentations/Microsoft_Partner_Code_of_Conduct_Spanish1.pdf

SAP

https://www.sap.com/documents/2023/07/02b2d2b7-7e7e-0010-bca6-c68f7e60039b.html

Others:

Request from the Compliance Officer.

CHAPTER IV

OUR FREE TIME



What you do in your private life is in principle, your decision. However, personal activities which could affect your reputation and GBM's Company interests will become an interest of the Company. GBM represents your privacy and, as a result, defines some areas in which you should care for your private life not to be a conflict with your work.

Your private life is something strictly personal, However, a conflict of interest may occur if you engage in an activity or if you promote personal interests at the expense of GBM's interest. It depends on you that your ethics and loyalty can be questioned. Every individual situation is different and at evaluating yours, you will have to consider several matters. Following are some examples of conflicts which will guide for decisions:

ASSISTANCE TO COMPETITION

A clear conflict of interest results from working, collaborating or somehow influencing an organization which commercializes products of services competing with the products and services of GBM. Naturally, you cannot reveal GBM's information being a competitive advantage for the organization or which a third party could take advantage of.

COMPETITION AGAINST GBM

You cannot commercialize products or services which compete with GBM's offers. Commercializing being understood as: you receive a remuneration directly or indirectly of any kind.

Since GBM rapidly expands to new businesses and new areas of interest, the Company has to constantly modify the guidelines for activities considered acceptable. Therefore, it is possible that you do not find all answers to your queries in the published norms. You have the responsibility to ask the Compliance Officer before you continue with an activity that could potentially be understood as a conflict of interest with the Company.

GBM'S SUPPLIER

Except for express authorization form the CFO and the Compliance Officer , you cannot be a supplier of GBM, to represent a supplier of GBM or to work for a supplier while you are working with GBM. In addition, you cannot accept money or benefits if any kind for advisory or services that could be provided to a supplier, in virtue of the commercial relation of this supplier with GBM.

USING GBM'S TIME AND ASSETS

You cannot provide or offer an external job if you are at GBM's offices or while you are in the working time with GBM. You cannot do it during a remunerated leave granted to you to solve personal matters. In addition, you cannot use the telephone, equipment, materials, resources or information of GBM for any external work, whether it is remunerated or not.

PERSONAL FINANCIAL INTERESTS

You should not have investments in any organization with which GBM keeps a commercial relationship, if these could generate a conflict with the Company. This applies to suppliers, competitors, customers, distributors and associated companies.

In order to determine is there could be a confit of interest, following questions could guide you:

- What is the competition approach or the relationship between GBM and the other Company?
- What is the size of my investment related to my salary and other income of the family, including income from other investments?
- Is it significant as to consider some actions as an employee in order to protect or improve?
- Due to the nature of my job at GBM. Could my acts an employee affects the value of my investment in the other Company?
- Could my actions improve my investments, even if the investment is non-significant?

Financial interests are not appropriate and therefore represent a conflict of interest if, considered objectively by the other individual, the relation between your job, the amount of your investment and the specific Company for which you have invested, could influence your actions as an employee of GBM.

Related to a supplying Company or associated to GBM, if you intervene directly or indirectly in the decision that is taken when doing business with that Company, should not be any economic interest in it. Also, should not act, indirectly, through a third to avoid the regulation referring to investments. Exceptions to this regulation should be approved by the Compliance Officer.

A PERSON CLOSE TO YOU WORKS IN INFORMATION TECHNOLOGY

With the growth of industry and the increase in the name of families in which

both husband and wife work, you could be involved in a situation in which one party, or other member of the family directly or any other person close to you, be a competitor or supplier of GBM o is hired by GBM in a commercial or working relationship. In this situation you should be extremely careful about discretion, confidentiality and conflicts of interest. A close relationship could involuntarily lead you to compromise GBM's interests.

When dealing with this situation, several considerations should be taken into account, among others, the relationship between GBM and the other person, the nature of your responsibilities as an employee of GBM and the ones of the person close to you, as well as the access each one of you have to confidential information in your companies.

To suppress any doubt, you should revise your particular situation with the Compliance Officer to evaluate the nature of the problem and best and approach to resolve.

PUBLIC SERVICE AND POLITICAL ACTIVITY

GBM does not consider a problem if you as an employee participate in civic or social work activities in your communities. However, in some instances that participation could cause a conflict of interest. For example, when you have to be a member of a commission or a county committee or of other kind, and you have to decide on something that could affect GBM. In this case you will have to refrain from participate.

When analyzing possible consequences of your decision, it could be useful to ask following questions:

- How will the press publish this information and what would be the public reaction to this information?
- Would it be better to refrain from doing so to preserve credibility about objectivity and integrity?
- Would GBM unnecessarily, in an uncomfortable situation, with your vote in favor or against your interests?

"Whatever your final decision is, you have to clarify that you are a GBM's employee, to avoid accusations which make you look as trying to hide your association with the company. If you decide to refrain, clearly indicate that it is because, otherwise, it could create or could be seen as a conflict of interest."

CHAPTER V

MEDIA AND SOCIAL NETWORK



When expressing your opinion on public matters, whether in social network or in any other oral or written means, make sure you express your opinion as your personal one. Do not pretend to act or speak for GBM, or link your position at GBM to an opinion or personal criteria, and can be coordinated through Human Capital team.

GBM has appointed authorized spokesmen to address company's matters, and you should reach these spokesmen for any information required at external level. There are spokesmen identified in each country operation and could be coordinated through Human Capital team.

SPOKESMAN TO THE MEDIA

If any external party requests for confidential information, confidential restricted or GBM internal use, directly or through third parties, do not respond, unless you have been authorized for this. If no authorization has been given, you should address the interested party to the Regional Manager of Human Capital, who will appropriately handle the request. Also, if you have not been authorized to talk to journalists or any other individual who is writing a report on GBM or a field of information, address this person.

USE OF SOCIAL MEDIA AND PERSONAL OPINION

Even when you have free of speech, consider always the negative impact that your opinions (political party, religion, sports, gender) could have in the commercial relationships of GBM and your job.

Also, if you are informed that an employee could be misleading due to a personal comment which could be associated to GBM, you are in the obligation to alert the Compliance Officer or to GBM's instance which could be affected.

Following are the basic rules recommended by GBM for your social network behavior:

1. **PRIVACY** Even when in social networks your profile could be public or have some configuration for privacy, remember that your opinions, pictures or publications could become public by other means. We strongly suggest not to share passwords, locations, travel status, phone numbers, or bank accounts or other sensitive data in those means. If you have children, try not to share a lot of information on them, for their personal safety.
2. **APPROPRIATE LANGUAGE** Social network is a public opinion space, even when your account has been configured with privacy. Try not to use obscene

language. If you write, do it properly and when in video, speak properly, without offending anyone in particular as co-workers, bosses, authorities, neighbors or friends.

3. **PICTURES AND VIDEOS.** Avoid sharing pictures and videos when your behavior could be judged as inappropriate, abusing drinking, sex explicit scenes, little clothes, vandalism, with guns or any other act which could be considered contrary to the law and good morals.

4. **COMMENTS ON COMPETITION OR OTHER COMPANIES.** Avoid referring to competition of GBM or other companies, mainly if your comment is negative. If you have to claim for a poor customer service, company's mistake or others, use the private channels as an electronic mail, a phone call or customer service in order to clarify any situation.

5. **AVOID THE PUBLICATION OF FAKE NEWS.** Could be subject of accusations for defamation or slander. Verify information before sharing.

CHAPTER VI

CONFLICTS OF INTEREST



CONFLICTS OF INTEREST DUE TO CONSANGUINITY

The Human Capital department verifies during the recruitment and selection process, the existence of kinship prior to hiring (applies to permanent, temporary, internship or scholarship positions), because GBM does not hire candidates when they are related by blood or affinity with executives of the company, including Directors and all those who hold management positions (General Manager, Controller, Sales Manager, Service Manager, etc.).

Highly qualified exception cases, justified by a special need or convenience for GBM, are evaluated and approved in consensus by the CFO and the Management Services Department, for which the corresponding approval must be supported in the new employee's file. These cases of exception must be communicated to the Compliance Officer together with the remedial plan established to avoid the conflict of interest.

CONFLICTS OF INTEREST COMMERCIAL RELATIONSHIPS

Members of the Board of Directors, Executive Committee, Senior Management and other employees of the Company must avoid any conflict between their own interests and the interests of the Company when dealing with suppliers, customers, contractors or any person outside GBM, which affects the fulfillment of their obligations to the Company.

It is the responsibility of each GBM collaborator, including the members of the Board of Directors and Support Committees, to communicate any apparent situation of conflict of interest that he/she identifies in the entity, which must be done through the means provided by the entity for such purposes.

Stakeholders should be fully, accurately and comprehensibly informed prior to the provision of services, and informed of potential conflicts of interest that may arise, as well as the procedures and measures adopted to manage such conflicts.

Any situation involving a conflict of interest shall be reported to the immediate management so that the situation can be evaluated and approved in consensus by the CFO and the Compliance Officer.

REAL OR APPARENT CONFLICT

All GBM employees must complete the **"Annual Declaration of Conflicts of Interest"** in January of each year, before

the Human Capital area and the Compliance Officer, to disclose details of possible conflicts of interest.

All GBM employees must avoid transactions with customers and suppliers, and business or financial situations of any kind, in which their personal or economic interests may be in real or apparent conflict with the interests of GBM.

No employee should accept political, economic, family and/or any other type of pressure in the performance of his or her duties, in such a way that it influences the making of decisions that are not appropriate or adequate for the practice of the Company's business or operations.

The Company must disclose, in the notes to the company's financial statements, the transactions it carries out with related parties, and any potential situation that could generate a conflict with such parties.

CHAPTER VII

PENALTIES FOR NON-COMPLIANCE

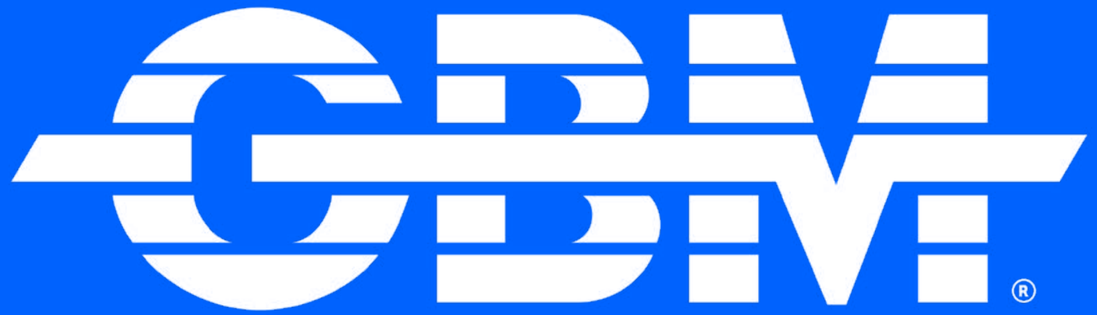


DUE PROCESS AND PENALTIES FOR NON-COMPLIANCE

Violations of this code will be reported to the Human Capital Regional Manager or Compliance Officer, who will be responsible for classifying the type of complaint as a violation of the Code of Ethics, violation of policies, misconduct, inappropriate behavior, discrimination, harassment, bullying, harassment, labor issues, bribery and corruption.

The due process of investigation and resolution of complaints will be carried out in accordance with the provisions of the Investigation and Remediation Protocol, while the disciplinary measures to be applied must be aligned with the provisions of the Policy for the Employee Disciplinary Process.

The foregoing is without prejudice to any criminal and civil liabilities that may apply.



DENOUNCE RESPONSIBLY

https://denuncias-gbm.mira.cr| etica@gbm.net