	<h2>Anti-Corruption Policy</h2>	<p>Code: ECR-PO-04</p>
<p>Prepared by: ECR Manager</p>	<p>Governing date: September 1, 2022</p>	<p>Version: 03</p>
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PURPOSE

Since our inception GRUPO STT, its subsidiaries and affiliates, known for the purposes of this policy as “The Company”, have been characterized by conducting business with the honesty, responsibility and transparency possible, as well as taking the care of a good father of a family, in regarding the information that our clients reveal to us and this is supported by our Code of ethics and business conduct.

We are committed to always providing quality service and to do so we are obliged to comply with all applicable laws of the countries where we are doing business, such as: The Foreign Corrupt Practices Act (FCPA) of the US, the UK Bribery Act and similar laws of other countries and territories.

For this reason and in order to maintain the prestige in each of the services we offer, this Anti-Corruption Policy is created to raise awareness and educate each of our collaborators and any person who offers our services on behalf of our company, subsidiaries. and subsidiaries everything related to anti-corruption laws as well as to make it clear that on the part of GRUPO STT, its subsidiaries and affiliates we have zero tolerance regarding conduct that is considered corrupt such as bribery.

SCOPE

This policy is applicable to all personnel of Grupo STT, subsidiaries and affiliates, as well as its shareholders and members of the Board of Directors.

This Policy applies to the entire Company, shareholders, members of the Board of Directors, and its Employees in its different affiliates and subsidiaries. Collaborators are understood to be all Managers, Collaborators linked by employment contract and Related Third Parties. These representatives have the responsibility of complying with this policy in the exercise of their functions on behalf of the company and it is the responsibility of management to ensure its faithful compliance.

The violation of any federal, state or foreign law will not be allowed or tolerated, therefore said policy must comply with the laws of each country where it applies.

AREAS RESPONSIBLE FOR ITS IMPLEMENTATION AND COMPLIANCE


The Ethics and Regulatory Compliance Management together with the Corporate Legal Director of GRUPO STT are responsible for supervising this policy and the company's anti-corruption program, and must also ensure to:

- Keep this document updated.
- Review and approve possible modifications or updates to this document.
- Verify that this document is communicated to the collaborators involved.
- Verify compliance with the guidelines described in this document.

DESCRIPTION

ALL FORM OF BRIBERY AND CORRUPTION IS PROHIBITED

The Company strictly and absolutely prohibits bribery in any form, whether it is carried out directly or indirectly or, where appropriate, through any agent or third party, in relation to a public official or a private person.

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Bribery is defined as the act of giving, offering, promising to request or receive something of value, either directly or indirectly, to persons in both the public and private sectors, the above as consideration for an undue or inappropriate benefit or advantage, regardless of whether said offer, promise or request whether for yourself or a third party or on behalf of a third party.

The following constitutes an exemplary but non-limiting list of acts that constitute bribes:

- granting of money, gifts, loans, dinners, trips, tourist excursions, accommodation, or discounts on any of the services offered by the Company or other benefits not available to the general public.

Collaborators and any person who offers our services on behalf of our company, subsidiaries and affiliates have the responsibility of recognizing alerts indicating a possible case of bribery or corruption and must respond in the most appropriate manner in accordance with what is established in this policy.

Therefore, it is totally prohibited for collaborators and any person who offers our services on behalf of our company to offer, pay, promise payment, authorize payment, request, receive or authorize the receipt of money or anything of value, whether directly or indirectly, with the purpose of obtaining any improper advantage. It should be noted that the term "anything of value" includes money, gifts, entertainment, travel, services and any other entertainment.


Current laws emphasize the prohibition that exists regarding bribery and corruption of public officials. The Department of Ethics and Regulatory Compliance is here to provide additional guidance in case of doubt regarding the definition of what a public official is, not However, below we mention the definition of a public official:

For the purposes of this Law, a public servant will be considered any person who provides services in the bodies and entities of the Public Administration, state and non-state, in its name and on its behalf and as part of its organization, by virtue of of an act of investiture and with complete independence of the imperative, representative, remunerated, permanent or public nature of the respective activity. The terms official, servant and public employee will be equivalent for the purposes of this Law.

The provisions of this Law will be applicable to de facto officials and people who work for public companies in any of their forms and to public entities in charge of procedures subject to common law; Likewise, to the attorneys, administrators, managers and legal representatives of the legal entities that guard, administer or exploit funds, goods or services of the Public Administration, by any title or management modality. (Art. 2 Law 8422)

GRUPO STT maintains a strict policy regarding bribery and corruption, which is why it has established important guidelines that must be respected when an employee interacts with clients, including: interacts with clients, including:

- It is not permitted to accept any gift or benefit from clients for the services for which the collaborator has been hired.
- GRUPO STT does not pay or receive bribes, illicit commissions or similar payments for the provision of its services.
- GRUPO STT offers its services based on their quality, with highly qualified and committed personnel in which their work receives the merit of satisfaction for the

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- service provided and their remuneration is not based or conditioned on any form of bribe or similar payment.
- Likewise, suppliers must not offer or accept bribes to obtain an advantage over the services or products offered by GRUPO STT.
 - GRUPO STT covers all representation and travel expenses when any of its executives visit or train any of its clients.

The general principles set out above are detailed below:

NO OFFERS OR RECEIPT OF EXTRAORDINARY PAYMENTS ARE ALLOWED

In accordance with the policy of compliance with all applicable laws, GRUPO STT does not allow this type of payments under any circumstances. STT GROUP strictly prohibits all its collaborators from offering extraordinary payments to public officials. In the same sense, GRUPO STT prohibits its collaborators from receiving extraordinary payments for the fulfillment of their functions within the company, or for favoring or accelerating any process within the company for the benefit of a third party.

IT IS MANDATORY TO REPORT CASES OF BLACKMAIL AND EXTORTION

Even if a public official or another person (for example, a potential client) asks you for an improper payment, that does not constitute an excuse to violate this policy, so our collaborators must refuse any situation of this nature and immediately notify their direct management and the Ethics and Regulatory Compliance Management.


COMPANY RESOURCES CANNOT BE USED FOR POLITICAL CONTRIBUTIONS AND PURPOSES

The use of the organization's assets, such as property or other resources, to make contributions or offer valuable objects for political purposes or to members of the same union is prohibited. The organization will not reimburse any employee for any personal contributions made for political purposes. The entire body of GRUPO STT collaborators is free to participate in political activities in their free time and on their own account, as long as you do not do so using the company name and that you notify your management and the Department of Ethics and Regulatory Compliance in advance.

CONTRIBUTIONS TO CHARITABLE ORGANIZATIONS AND FOR SPONSORSHIP OF EVENTS REQUIRE SPECIAL CONSIDERATION SOCIAL GOOD CONTRIBUTIONS

GRUPO STT is committed to serving the communities in which it operates. Anti-corruption laws do not prohibit legitimate donations and sponsorships, however we have the obligation to guarantee that the funds allocated for such purposes are used for the intended purpose and not are diverted and also that they reach the appropriate recipients and purposes. This policy covers contributions and event sponsorships to well-known charities for legitimate purposes that are modest in amount and do not raise regulatory violations or conflicts of interest.

Donations for events must be reviewed in advance by the Department of Ethics and Regulatory Compliance so that it can review the purpose and means used for the act of donation. The Department of Ethics and Regulatory Compliance may raise objections to acts of donation that have the following characteristics:

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- When there is suspicion of the charity, it means that it is possible that it is linked to a public official or a close family member or a business associated with a public official.
- The donation or sponsorship has been requested by a public official.
- The charity or event organizers are not transparent when it comes to the use of funds.
- The entity requesting the funds is not an established or well-known organization.
- The charity or event organizers request that the contribution be made in cash.
- Any other fact or circumstance that causes you to question whether the contribution will be used appropriately.
- Any other particular condition identified by the Ethics and Regulatory Compliance Department.

WE MUST KEEP RELIABLE BOOKS AND RECORDS

GRUPO STT stands out for honesty and trustworthiness in all our departments, which is why it is required to keep complete and reliable books, records and accounts. Expenses must be fully and accurately described in all business documentation, not only in terms of the expenses, but also in terms of their nature or destination. You should never create any false or misleading record or accept from any vendor or third party a record that does not meet our requirements. All business information, including business and financial transactions, must be disclosed in a timely and accurate manner.

Financial information must reflect actual transactions and conform to generally accepted accounting principles, our organization prohibits all persons from establishing unauthorized funds.


WE REQUIRE THE SAME BEHAVIOR FROM OUR BUSINESS PARTNERS

GRUPO STT's policy prohibits bribery and corruption, whether direct or indirect. We require our agents, consultants, joint venture partners, or any other third party acting on our behalf ("Business Partners") to perform legitimate services, and to adhere to standards of ethical and professional conduct, as set forth described in this Policy and in the Code of Ethics of GRUPO STT.

Warning signs ("alerts") are facts or circumstances – a specific pattern, practice or event – that indicate the possibility of corruption. There are many examples of alerts, and the following list does not include all that may arise.

- A new business partner is recommended by a public official.
- A public official or someone close shows business interest in a business partner.
- The partner has no experience in performing the work for which he has been hired or has been hired due solely to his influence with a public official.
- The business partner makes suspicious statements (e.g., "don't ask questions, I'll take care of everything"), is not transparent in his or her actions, or insists on keeping his or her relationship with you secret.
- The business partner's commission or profit margin is very high compared to industry standards or the type of work you will be doing.
- The business partner wants to be paid "under the table" or in an account in a tax haven.
- The partner refuses to sign a contract with anti-corruption guarantees.
- The business partner submits false invoices or refuses to provide documentation proving the invoice expense or other claimed expenses.

If you identify an alert, please contact the Regional Ethics and Regulatory Compliance Department.

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OUR RESPONSIBILITIES WHEN WORKING WITH BUSINESS PARTNERS

Due to the possible responsibilities associated with collaboration with business partners, there are a series of measures to protect GRUPO STT:

- Due diligence must be documented and maintained in a file open to the business partner, which will be kept in the office of the Regional Ethics and Compliance Manager. Due diligence should be updated periodically, at least every three years.
- Business partners should not be asked to provide services without a contract. Contracts help demonstrate the legitimate reasons why a partner (or the hired entity) was hired and the services they provide. The only exception will be through the Exception Ballot mechanism authorized by the CEO.
- Likewise, contracts typically contain provisions to help protect GRUPO STT. Therefore, they are important. Check with your local legal department to find out what clauses are necessary.

Employees must also ensure that compensation paid to a business partner represents an appropriate value in accordance with the legitimate assets or services provided. Payments to business partners must not be made in cash, or to someone other than the counterparty to the contract.

Our responsibilities do not end once a business partner has a contract. We must constantly monitor the activities of our partners. The Regional Ethics and Regulatory Compliance Manager and/or the Corporate Legal Director must be informed of any alerts or other concerns about the correctness of a partner's conduct that arise in the course of the relationship with said partner so that they can weigh the risks and develop appropriate safeguards. Some examples of problems that could arise in the conduct of a business partner:

- The business partner requests additional compensation when there is no legitimate need;
- There is news that a public official, or a close relative or partner of a public official, has an interest in a partner of the company; either
- There are rumors that a partner is under investigation for money laundering or some other criminal activity.

GRUPO STT may carry out training for business partners, audits or seek compliance certifications when relevant.


STT GROUP encourages its employees to share this Anti-Corruption Policy with their business partners so that they are aware of their commitment to legal and ethical business practices.

WE DO NOT HELP CLIENTS WITH INAPPROPRIATE CONDUCT

The staff or employees of GRUPO STT, who work for a client, must not allow themselves to be tempted by improper payments or other dishonest behavior. Employees who encounter a situation that raises these types of concerns should discuss it as soon as possible with their supervisor or seek advice from staff in the Legal and Regional Ethics and Regulatory Compliance departments. Don't try to solve these types of problems on your own.

DUE DILIGENCE IS NECESSARY IN MERGER AND ACQUISITION ACTIVITIES

GRUPO STT may participate in acquisitions of other companies and/or be part of the acquisition. With the acquisition of another company, GRUPO STT may become responsible for the previous conduct of that company. STT GROUP may also be responsible for continuing conduct that violates anti-bribery and anti-corruption laws.

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Therefore, the company's policy contemplates that, before closing an acquisition, anti-corruption due diligence is carried out to allow it to identify and mitigate risks. Additionally, the company will incorporate and/or ensure that the acquisition has internal controls and in its compliance program to the extent possible, including through training new employees, reviewing relationships with third parties, and conducting audits, as appropriate. GRUPO STT employees are obliged to cooperate in any of these actions.

ANNUAL TRAINING AND CERTIFICATION

The person in charge has established objective criteria for mandatory annual training in relation to anti-corruption principles. As part of the annual training requirements, it is required to obtain a certification in which certain questions are answered and the interested party certifies that:

- you have read and understood this policy;
- will respect its terms; and
- is not aware of any violations of this policy.

INFORMATION AND NON-RETALIATION

All GRUPO STT employees who have knowledge or suspicion that this policy may have been violated must:

- Notify the Corporate Legal Director or the Regional Ethics and Regulatory Compliance Manager

The identity of reporters regarding a violation or suspected violation of company policy will be kept confidential, except to the extent necessary to protect the interests of GRUPO STT or as required by current law.

The company will not tolerate retaliation against people who report in good faith. Any person who has knowledge of what they believe to be a form of retaliation should inform the Regional Ethics and Regulatory Compliance Manager.

DISCIPLINARY MEASURES

Employees who violate this policy will be subject to disciplinary action, up to and including termination, and may also be subject to individual criminal prosecution and/or civil prosecution in relevant jurisdictions. Business partners who violate this policy are subject to termination of all business relationships with GRUPO STT.

Each of us has a responsibility to ensure that our high standards of good conduct and honesty are maintained. Protecting our brand and reputation means making the right decisions. I count on each of you to promote and protect our brand by knowing, understanding and following the policies of the STT GROUP, as well as its Anti-Corruption Policy, due to the commitment of all our employees to work honestly.

UPDATES CONTROL

V	Name of change requester	Position	Date	P.	Description of the change
2	Mileyvi Lopez	Leader of quality	November		Adjusts: Scope



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			22, 2021		and COMPANY RESOURCES CANNOT BE USED FOR POLITICAL PURPOSES AND CONTRIBUTIONS
3	Elieth Solis	Quality Manager	09/01/2022	1-3	Information labeling is added