



**Comprehensive Global Technology Solutions in ICT Infrastructure,
Logistics and Information Security**

INTEGRITY POLICY

1. OBJECTIVE.

Establish prevention, compliance, supervision, and accountability mechanisms to avoid acts related to Administrative Misconduct and the Code of Ethics and Conduct by SOWA COMPUTACION S. DE RL DE CV in its business relationship with other people, such as Entities and Public Servants, clients, suppliers or any third party, in accordance with Articles 24 and 25 of the General Law of Administrative Responsibilities (LGRA) and the best corporate practices applicable to companies.

2. SCOPE

It is applicable to all Collaborators (directors, directors, managers, employees, temporary staff and scholarship holders) who act on behalf (legal or factual) of Companies with Public Entities, Public Servants, Individuals and, in general, with any third party.

3. POLICIES

Collaborators must follow the following general policies:

3.1 Inappropriate influence

Influence Trafficking is prohibited, so they should not inappropriately influence Public Servants, clients, suppliers or any third party, offering them something of value to obtain an advantage for the benefit of the Companies.



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3.2 Bribery, extortion and payments to facilitate paperwork

- It is forbidden to promise, offer or deliver something of value to Public Servants, clients, suppliers or any third party, either directly or indirectly, in exchange for them carrying out or refraining from carrying out activities related to their functions.
- Payments outside of regulations are prohibited, made to facilitate or expedite obtaining a license, authorization, permit and in general any government procedure even when the payment is requested by Public Servants or is considered a common practice.

3.3 Unlawful participation in administrative proceedings and Collusion

- They must carry out the principles of integrity presented in this policy, in private contracts, always complying with the corresponding internal procedures.
- The Companies will refrain from carrying out acts of Collusion with third parties, whether in the public or private sector, in order to improperly obtain any public or private contracting.

3.4 Adequate documentation as a means of prevention

Ensure that books, records and accounts clearly and adequately reflect and document the activities and business matters carried out by the Companies, in accordance with internal policies, best practices, laws, rules and regulations applicable in Mexico.

3.5 Improper Hiring of Former Public Servants and people who may represent a risk for the Companies and their operations.

- The Human Resources areas will ensure that their hiring procedures prevent the incorporation of people who could constitute a risk to the integrity and reputation of the Companies.
- They must refrain from hiring, in the periods established by regulation, a Public Servant, Public Official or public employee who possesses privileged information that he has directly acquired as a result of his employment, and that could generate a benefit for the Companies in the market or puts you in an advantageous position over your competitors.



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3.6 Adequate handling or safeguarding of information

- It is the responsibility of the Collaborators to register, integrate, safeguard and take care of the documentation and information that, due to their position, are under their responsibility and prevent or avoid the improper use of it, its disclosure, theft, destruction, concealment or disablement without that such actions are carried out in accordance with the provisions of internal regulations.
- Obstruction of Investigation Powers is strictly prohibited by providing false information, delaying its delivery, manipulating, altering or deleting any type of file, whether digital or physical, which is subject to any investigation or requirement from the authorities.
- The use of false information to achieve a sale, an authorization, a benefit or to harm any person is prohibited.

3.7 Hide the true objective of certain operations

Practices that create an appearance of compliance but are intended to conceal an agreement or transaction that result in a breach of the law should be avoided.

3.8 Misuse of public resources

In case of having public resources, they must be used in accordance with the established objective and with transparency in the rendering of accounts to verify the destination of said resources.

4. ELEMENTS OF THE INTEGRITY POLICY

4.1 Human Resources and Organizational Structure Manual

The Companies have a Human Resources and Organizational Structure Manual that has the purpose of delimiting the functions and responsibilities of each of the Companies' areas, as well as those of their Collaborators, and clearly specify the chains of command and leadership. For this, it must have the following elements, which will be permanently updated and reviewed:

- 1) Corporate Organization Chart: reflects the position of the positions within the organizational structure, indicating the reporting lines for the main positions that make up the corporate organization.
- 2) Description of job positions: it is the process through which the functions and responsibilities, chain



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of command and leadership are determined for each position within the structure

Organizational of the Companies, considering their reason for being in attention to their expected objectives.

- 3) The areas and people that have a relationship with Public Entities and authorities for conducting business, attention to requirements, inspections, audits, and any other relationship with them must be identified, who must conduct themselves with a sense of legality, integrity and transparency in said corporate relationships, in accordance with this Policy and the Code of Ethics and Conduct.
- 4) Internal Work Regulations: It is the set of mandatory internal labor provisions applicable to employees and Companies, to ensure the proper development of their functions.

The Human Resources area of each of the Companies will be responsible for managing, ensuring and promoting, through the correct application of the applicable labor regulations, that the relationships between employees, unions and the Companies are developed within a framework of legality, integrity, ethics, respect, justice, transparency and equity, in a way that facilitates and encourages compliance with labor provisions, both for the benefit of employees and companies.

4.2 Code of Ethics and Conduct

The Companies have a Code of Ethics and Conduct (Code) approved by the Corporate Governance body or corresponding official, duly disseminated, published and socialized among all Company Collaborators, so that they know, understand and apply it; that it has systems and mechanisms for the application and constant supervision of its compliance and updating.

The Code defines the ethical standards that guide the corporate action of all employees of the Companies, as well as the standards that must be present in the decision-making and management of the Companies. Among the guidelines contemplated in this Code are those that govern Collaborators when they interact with stakeholders (that is, all those who may be affected, directly or indirectly, by the development of business activities), authorities or interested third parties. to avoid illicit acts, of Corruption, Bribery, Conflict of Interest or any other that goes against the corporate values of the Group; as well as guidelines that establish the obligation to maintain knowledge and application of laws, regulations, policies and procedures, internal and external,

It is the obligation of all Collaborators to accredit knowledge and understanding of the Code of Ethics and Conduct, otherwise, they will have to report it to their immediate boss, the Ethics Committee or the Compliance Officer to request that said Code be made their



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knowledge; as well as deliver in writing its declaration of compliance and knowledge of the Code and the Declaration on Conflicts of Interest annually or before, if applicable.

The content of the Code and any modification must be authorized by the corporate governance bodies or corresponding officials of the Companies, taking into account the applicable legislation, as well as the best corporate practices that ensure the development of the Companies' activities in an environment of corporate and business ethics. The Code must be reviewed and approved periodically.

4.3 COMPLAINTS LINE

The Companies have implemented a complaint line that can be used by their Collaborators and / or third parties. Disciplinary processes and specific sanctions must be applied with respect to those who act contrary to the Code, the Integrity Policy and other internal regulations or applicable legislation. In cases where the situation warrants it, the competent authority will be informed.

All Company Collaborators are responsible for reporting deviations, breaches or violations of the Code, as well as any applicable internal or external regulations, through any of the reporting channels implemented (telephone line, email and website).).

It is strictly forbidden to retaliate against anyone who makes a complaint based on real events. Likewise, Companies must make their Collaborators aware of the responsible use of reporting systems to avoid false reports.

In case there is any doubt about the complaints process, the Internal Control area should be contacted.

Various anonymous and confidential means of communication are available to facilitate complaints to Collaborators, which can be found in the following link: <https://www.sowacomputacion.com/contacto>, Email: rafael.ward@sowacomputacion.com

Head Office: (668) 8171845

Ethics Committee

SOWA COMPUTACION S. DE RL DE CV RFC: **SCO161229UI1** Address: Blvd Antonio Rosales # 239 Sur Colonia: Centro CP 81200 Headquarters: Los Mochis, Sinaloa
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The Ethics Committee or its similar in each Company, is a body made up of officials from different areas in charge of reviewing, updating and monitoring compliance with the Code. This Committee is empowered to hear, analyze and sanction complaints that imply violations of the Code. All complaints are treated anonymously and confidentially.

Informant Protection

For the protection of informants who make known or report to the Companies the probable existence of Administrative Faults, violations of the Code or applicable internal and external regulations, or those informants who present or help raise a genuine concern about the legality, legality, diligence, integrity, ethics, honorability, permissibility, authorization and / or any other, regarding any conduct, contract, tender, permit, license, relationship, operation, omission, intermediary, supplier, person, entity, authority and / or situation in general related to the development of corporate activities; Said Code establishes that it is prohibited to impose any type of punishment or retaliation against informants. Retaliation will be grounds for the imposition of internal disciplinary measures,

All collaborators must inform the Ethics Committee, the Compliance Officer or through the hotline, when they cannot fulfill their functions due to pressure, coercion, oppression, violence, intimidation, coercion, threat, blackmail, coercion and / or similar to that exercised by a third party as a consequence of their position, position, position, hierarchy, prestige, authority or influence in the Companies.

4.4 CONTROL, SURVEILLANCE AND AUDIT SYSTEMS

Compliance

SOWA COMPUTACION S. DE RL DE CV RFC: **SCO161229UI1** Address: Blvd Antonio Rosales # 239 Sur Colonia: Centro CP 81200 Headquarters: Los Mochis, Sinaloa
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The Compliance Officer is responsible for establishing an adequate and effective control and surveillance system that constantly and periodically examines compliance with integrity standards throughout the organization. Its objective is to guarantee the design, establishment, verification and updating of policies, processes, guidelines and controls that promote compliance with the internal and external regulations applicable to both the Companies and their Collaborators in relation to their corporate and business activities. Its functions include:

- 1) Encourage in Company Employees a culture of compliance with applicable internal and external regulations, emphasizing at all levels of staff the importance of their implementation and compliance, as well as integrity in their professional conduct, avoiding practices that may generate incentives. or opportunities to carry out inappropriate, criminal, dishonest, deceptive, improper, illegal activities or activities that violate corporate principles and values.
- 2) Definition of the activities and internal mechanisms for the prevention and detection of non-compliance, including the evaluation measures for each area, and the monitoring controls regarding possible non-compliance with the internal and external regulations applicable to the Companies. The prevention activities must ensure that the areas with possible conflicts of interest are identified for the purposes of executing the necessary and effective measures to prevent and punish the behaviors that compromise the impartiality of the Collaborators in the ethical, efficient and objective performance of its functions.
- 3) Supervise compliance with the applicable external and internal regulatory provisions, through, but not limited to, the analysis of changes and regulatory updates that apply to them, attention to trades and other information issued by the authorities.
- 4) Implementation of the internal monitoring and remediation mechanisms that allow the understanding of the reported situation, providing the results and recommendations derived from the compliance function in order to guarantee the application of the corresponding corrective, preventive and improvement measures.
- 5) Establishment of internal information and communication mechanisms, implementing clear and timely lines of communication and reporting. These lines of communication within the Companies should stimulate the reporting of Administrative Faults, violations of the applicable internal and external regulations, as well as any problem, claim, concern, doubt, comment or suggestion regarding the daily activities carried out by collaborators in the performance of their duties, this with the purpose of preventing employees from hiding information, as well as promoting a work environment of regulatory compliance and continuous corporate improvement. For this, the information and communication mechanisms must foresee, when the urgency or relevance of the situation warrants it,

Any action that could lead to a violation of this Policy or any other applicable internal or external regulations must be reported to the Compliance Officer, who will escalate the highest risk issues to the corresponding Corporate Governance body.

Audit



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The Internal Audit area of the Companies must include, within its audit program, the review of the effectiveness of the controls implemented for compliance with internal integrity standards, as well as the sufficiency and suitability of said standards, in order to detect and, where appropriate, avoid acts related to Bribery, Corruption, Administrative Misconduct or breaches of any external or internal regulations applicable to corporate and business activities, by employees, suppliers, or third parties.

4.5 TRAINING AND TRAINING SYSTEMS AND PROCESSES

Training and qualification

The Compliance area, in coordination with Human Resources, is responsible for establishing adequate training systems and processes regarding the integrity measures contained in this policy. To do this, it must develop and implement a risk-based training program, with the aim of guaranteeing that all those Collaborators who, due to their positions, functions and / or areas, or processes in which, directly or indirectly, intervene, and / or that by provision in applicable internal or external regulations require constant or specific training, this is given according to the time, form and content required, in conjunction with the expert area on the subject to be trained.

Dissemination of the Regulatory Framework

The Companies will have tools through which, the internal policies, rules and procedures, as well as the laws, regulations, codes and other legal or corporate provisions that are applicable to the Companies are disseminated, socialized and explained to the collaborators. and their activities. These tools will be accessible to all Collaborators, except for exceptions due to confidentiality issues.



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Additionally, the Companies must have policies and procedures that promote that the business relationship with customers and suppliers, as well as the relationship with the authorities, is developed under an ethical, integrity, transparency and legality environment, which provides security for both Companies and their interacting people.

The following documents and policies are some of those that should be considered part of this Integrity Policy and should be disseminated in the aforementioned tool:

- Code of Ethics and Conduct
- Organization and Procedures Manual
- Human Resources Policy
- Compliance Policy
- Anticorruption Policy
- Travel Expense Policy, Per diem and Hospitality
- Ethical Principles for Suppliers and Business Partners
- Policy to Prevent Money Laundering and Terrorist Financing
- Information Security Policy and Protection of Personal Data
- Conflict of Interest Policy
- Fraud Prevention Policy

4.6 HUMAN RESOURCES POLICY

The Human Resources Policy must have as one of its main objectives to avoid the incorporation of people or entities that may generate a risk in compliance with the policies, guidelines, values and internal and external regulations applicable to the Companies,

in an environment of integrity, legality and corporate ethics. Said policy must in no case authorize discrimination against any person motivated by ethnic or national origin, gender, age, disabilities, social condition, health conditions, religion, opinions, sexual preferences, marital status. or any other that violates human dignity and has the objective of nullifying or undermining the rights and freedoms of people.

This policy must establish that the people who enter as Collaborators must comply with the requirements of technical and professional quality, aptitudes, experience, specific skills, good repute and credibility in order to perform the functions and responsibilities assigned to



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them in a competent, integrity and ethical manner. at the hierarchical level and position to perform.

The Human Resources area, when it deems it necessary, must apply tests of trust to employees that allow and help to measure the potential risks of inappropriate behavior within the Companies.

4.7 TRANSPARENCY MECHANISMS AND PUBLICITY OF INTEREST

Companies must establish mechanisms that ensure transparency and publicity of corporate interests at all times, for which:

- SOWA COMPUTACION S. DE RL DE CV, complies with the information disclosure requirements established by the securities market.
- It keeps its corporate and accounting books up to date and in accordance with applicable regulations.
- Collaborators and suppliers declare relationships that could generate possible conflicts of interest to prevent and punish behaviors that compromise the impartiality of Collaborators in the ethical, efficient and objective performance of their functions.

On the website of SOWA COMPUTACION S. DE RL DE CV, the Code of Ethics and Conduct and some policies related to integrity are published.

1. SANCTIONS

Violations of the rules contained in the Business Integrity Policy will result in disciplinary measures that will vary, depending on the circumstances and severity of each case, based on the provisions of the Code of Ethics and Conduct and, if necessary, the established in the applicable laws.

2. GLOSSARY

The terms defined below with an initial capital letter will have the following meaning, whether these terms are used in the singular or plural:

Collusion: When the Collaborator or third party executes with one or more Private parties, in the matter of public contracting, actions that imply or have the object or effect of obtaining an undue benefit or advantage in federal, local or municipal public contracting.



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Collusion will also be considered when Collaborators or third parties agree or enter into contracts, agreements, arrangements or combinations between competitors, the object or effect of which is to obtain an undue benefit or cause damage to a third party, the public treasury or the assets of Public Entities.

Interest conflict: The possible impact on the impartial and objective performance of the functions of the collaborators of the Companies, due to personal, family, economic, business interests or of any other nature.

Improper Hiring of Former Public Servants: When the Collaborator hires someone who has been a Public Servant during the previous year, who has privileged information that he has directly acquired as a result of his employment, position or commission in the public service.

Corruption: It is the abuse of power for one's own benefit or that of a third party. Corruption encompasses a variety of situations, such as Bribery, nepotism, collusion, Influence Trafficking, the delivery of facilitating or accelerating payments, bribery, conflicts of interest, theft, Extortion, embezzlement, Use undue resources, among others.

Corruption can be presented to Public Officials, Entities that manage public resources and are the authority against Individuals, officials of companies and private companies in order to obtain a business advantage or a decision that would not have corresponded except as a consequence of said activities, behaviors or omissions.

Public entity: The Legislative, Executive and Judicial Powers, the State Secretariats, the Legal Counsel, the autonomous constitutional bodies, parastatal entities, companies with majority state participation; the agencies, bodies, agencies and entities of the Federal Public Administration (centralized and parastatal), public trusts, the Attorney General's Office (Attorney General's Office), jurisdictional bodies that are not part of the judicial powers, the productive state companies, as well as any other entity over which any of the aforementioned powers and public bodies of the three levels of government have control; as well as the counterparts of all the aforementioned public entities and entities that exist in the federative entities, municipalities and mayors of Mexico City and their dependencies and entities, as well as the Public Servants of the

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organizations to which the Political Constitution of the United Mexican States grants autonomy (for example, Bank of Mexico, National Electoral Institute, National Commission of Human Rights, National Institute of Statistics and Geography, Federal Institute of Telecommunications, Federal Commission of Economic Competition, National Institute of Transparency, Access to Information and Data Protection, Office of the Attorney General of the Republic); as well as the counterparts of all these Public Servants that exist at the state, municipal level and in the territorial demarcation of Mexico City. as well as to the Public Servants of the organizations to which the Political Constitution of the United Mexican States grants autonomy (for example, Bank of Mexico, National Electoral Institute, National Human Rights Commission, National Institute of Statistics and Geography, Federal Institute of Telecommunications, Federal Commission for Economic Competition, National Institute of Transparency, Access to Information and Data Protection, Office of the Attorney General of the Republic); as well as the counterparts of all these Public Servants that exist at the state, municipal level and in the territorial demarcation of Mexico City. as well as to the Public Servants of the organizations to which the Political Constitution of the United Mexican States grants autonomy (for example, Bank of Mexico, National Electoral Institute, National Human Rights Commission, National Institute of Statistics and Geography, Federal Institute of Telecommunications, Federal Commission for Economic Competition, National Institute of Transparency, Access to Information and Data Protection, Office of the Attorney General of the Republic); as well as the counterparts of all these Public Servants that exist at the state, municipal level and in the territorial demarcation of Mexico City. Federal Commission for Economic Competition, National Institute of Transparency, Access to Information and Data Protection, Office of the Attorney General of the Republic); as well as the counterparts of all these Public Servants that exist at the state, municipal level and in the territorial demarcation of Mexico City. Federal Commission for Economic Competition, National Institute of Transparency, Access to Information and Data Protection, Office of the Attorney General of the Republic); as well as the counterparts of all these Public Servants that exist at the state, municipal level and in the territorial demarcation of Mexico City. Federal Commission for Economic Competition, National Institute of Transparency, Access to Information and Data Protection, Office of the Attorney General of the Republic); as well as the counterparts of all these Public Servants that exist at the state, municipal level and in the territorial demarcation of Mexico City.

Administrative offense: These are the acts provided for in Chapter III, of Title Three of the LGRA, which refers to the acts of individuals linked to serious administrative misconduct.

Official or Public Servant: It is any person who exercises a job within the structure of the Mexican State. As they are, among others:

- Employees of any Public Entity at the national, state or local level.

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- Elected or appointed Public Officials and their family members, including current and former officials, and those awaiting office.
- Leaders of political parties and employees of political parties.
- Candidates for elected office.
- Employees of organizations contemplated in international treaties, especially with respect to those to which Mexico is a party, for example, the European Union, United Nations Organization, Inter-American Court of Human Rights, Organization for Economic Cooperation and Development, World Bank, International Labor Organization, World Health Organization, International Monetary Fund.

LGRA: It means the General Law of Administrative Responsibilities, which is an ordinance of public order and of general observance throughout the Mexican Republic, which aims to distribute powers among the orders of government to establish the administrative responsibilities of Public Servants, their obligations, the applicable sanctions for the acts or omissions in which they incur and those that correspond to the Individuals linked to Administrative Misconduct, as well as the procedures for their application.

Obstruction of Research Faculties: When the Collaborator or third party, having information related to an investigation by the competent authorities regarding the probable commission of Administrative Misconduct, provides false information, deliberately and unjustifiably delays the delivery of the same, or does not give any response to the requirements or resolutions of investigating, substantiating or resolutive authorities, as long as coercion measures have been previously imposed in accordance with the applicable provisions. For the purposes of this Integrity Policy, it may also be considered as Obstruction of investigative powers, even when the imposition of enforcement measures has not been mediated.

Illegal Participation in Administrative Procedures: When the Collaborator or the third party performs acts or omissions to participate in said administrative procedures, be they federal, local or municipal, notwithstanding that by provision of law or resolution of a competent authority he is prevented or disabled from doing so.

It is also considered when any collaborator or other person intervenes on their own behalf, on behalf of or on behalf (legal or factual), or on behalf of the Companies, when it is impeded or disabled to participate in federal, local or municipal administrative procedures, with the purpose of obtaining, totally or partially, the benefits derived from said procedures.

Individuals: Physical or legal person that does not belong, nor work, nor represent (legally or factually), nor act (legally or factually) on behalf of or on behalf of a Public Entity.



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Bribery: When the Collaborator or the third party promises, offers or delivers any undue benefit to one or more Public Servants, Public or Private Entities, directly or through third parties, in exchange for said Public Servants, Public or Private Entities, to make or refrain from perform an act related to their functions or those of another Public Servant, Entity or Private Party, or, abuse their real or supposed influence,

for the purpose of obtaining or maintaining, for himself or for a third party, a benefit or advantage, regardless of the acceptance or receipt of the benefit or the result obtained.

Influence peddling: When the Collaborator or third party induces authority using their influence, economic or political power, real or fictitious, over any Private Party, Public Servant or Public Official, with the purpose of obtaining for themselves or for the Companies a benefit or advantage, or for cause damage to any person or public service, regardless of the acceptance of the third party, or the result obtained.

Misuse of Public Resources: When the Collaborator or third party performs acts by which he appropriates, misuses or deviates from the object for which public resources are provided, be they material, human, financial or of another nature, when for any reason he handles, receives, manages or have access to these resources.

The misuse of public resources is also considered the failure to render accounts that prove the destination that was granted to said resources.

Use of False Information: When the Collaborator or third party presents false or altered documentation or information, or simulates compliance with requirements or rules established in administrative procedures, with the purpose of obtaining an authorization, a benefit, an advantage or to harm any person.