



ANTI-BRIBERY CODE OF ETHICS

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ANTI-BRIBERY CODE OF ETHICS

Since its inception, SINTEL INTERNATIONAL has maintained a steadfast commitment to ethical and honest operation, focusing on providing comprehensive technological solutions to our clients transparently. In this regard, our company considers it essential that its personnel be guided by ethical policies that clearly establish the guidelines for expected behavior at all levels of the company.

SINTEL promotes the implementation of quality management systems, innovation in processes, and the continuous pursuit of improvements. Striving to ensure that our human team adopts upright and honest practices, fundamental for relationships with partners, clients, suppliers, and the general public.

The guidelines established in this standard apply to all employees and personnel linked to SINTEL, regardless of the type of contract, hierarchical level, geographical location, or seniority in the company. Likewise, these provisions extend to those who perform activities other than work, such as interns, trainees in work training, or other similar regimes, as long as the nature of such activities is applicable to SINTEL.

The purpose of SINTEL's anti-bribery code of ethics is to combat bribery. The human resources department will ensure compliance with this policy and anti-bribery code of ethics, reporting directly to the general management.

I OBJETIVE

The Code of Ethics and Anti-Bribery aims to establish guidelines that govern, regulate, and sanction the conduct of all personnel at SINTEL, including partners, managers, employees, and collaborators.

II SCOPE

Compliance with the Code of Ethics and Anti-Bribery is mandatory for all SINTEL personnel. Everyone has the obligation and the right to know these provisions in order to promote and maintain a harmonious work environment. SINTEL personnel holding management positions must ensure that the Code of Ethics and Anti-Bribery is clearly communicated to all staff. It should be noted that non-compliance with this code will result in sanctions in accordance with current corporate and regulatory legal norms.

III RESPONSIBILITIES AND DUTIES OF HUMAN RESOURCES

- Promote and continuously supervise the design, implementation, and compliance monitoring of this code in various areas of the company. Human resources has direct and quick access to the senior management body in case any issue or concern needs to be elevated regarding acts outside the regulations.

- Provide guidance and counseling to staff on the Anti-Bribery Code of Conduct and related matters.
- Establish procedures, tools, and approaches for anti-bribery management.
- Develop and execute the Anti-Bribery Management System.
- Manage due diligence in projects and procurement processes, evaluating the results of these assessments.
- Oversee the implementation of anti-bribery controls and verify their compliance.
- Ensure that the anti-bribery system meets standards recognized by the Company.
- Supervise, evaluate, and report on the performance of the anti-bribery system, including continuous improvements, to the company's senior management.
- Implement and assess metrics to monitor the effective operation of the Anti-Bribery Management System.
- Manage the operation of SINTEL's whistleblowing channel.
- Responsible for promptly investigating reports involving situations or acts of bribery. The results of these investigations will be presented to the competent committee.
- The Committee will apply administrative sanctions as established in the Internal Work Regulations. In cases involving possible civil or criminal penalties, the Committee will request the Legal Department to initiate the corresponding process.

IV BRIBERY

- It is prohibited to make direct or indirect payments, promises, or rewards in cash or in kind to public officials or their family members with the purpose of unduly influencing decision-making, generating or maintaining business, expediting administrative procedures, or obtaining benefits.
- This prohibition applies to all employees as well as third parties acting on our behalf.
- Employees are responsible for ensuring that third-party representatives with whom they interact comply with the policy. To do so, they must have a written contract reflecting the scope of services to be provided, the terms of compensation, and including an explicit clause regarding knowledge of and compliance with the code of ethics and the Anti-Bribery Policy.

V POLITICAL CONTRIBUTIONS

SINTEL's human resources shall not receive or grant gifts, attentions, or benefits to any candidate or political group.

VI DUE DILIGENCE

SINTEL conducts due diligence on suppliers, collaborators, and partners in each of its processes, identifying and minimizing risks through a series of controls.

VII FINANCIAL AND NON-FINANCIAL CONTROLS

SINTEL has policies in place to keep and maintain records and accounts reflecting the transparency of transactions because all transactions of any kind are required to be recorded in the financial statements.

VIII IMPLEMENTATION OF ANTI-BRIBERY CONTROLS BY ORGANIZATIONS AND BUSINESS PARTNERS

a) CONTRACTS WITH THIRD PARTIES

Third-party representatives must comply with the policy. To do so, within the written contract, the scope of services to be provided, the terms of compensation, and an explicit clause regarding knowledge of and compliance with the anti-bribery code of ethics and the integrated policy or signing the Commitment to the anti-bribery policy and code of ethics. Contracts include SINTEL's right to terminate the contract in the event of a violation of this anti-bribery code of ethics.

b) CONSORTIUMS

SINTEL will conduct an investigation through the procurement department to determine the background, business practices, and anti-corruption control measures of the potential partner before establishing any association or consortium without having previously conducted such investigation and verification and without having the final approval of the General Manager.

IX GIFTS, HOSPITALITY, DONATIONS, AND SIMILAR BENEFITS.

- a) It is prohibited to make payments in cash, attentions, gifts, bribes, entertainment, or any other item that could influence a business relationship or decision.
- b) Personnel are not allowed to accept cash payments or gifts in exchange for awarding contracts or orders to suppliers, subcontractors, or service companies.
- c) Occasionally, products with the company's brand of modest value (\$30 or less), such as pens, keychains, and agendas, may be accepted or given, provided that such items are legitimately part of events or conferences organized by SINTEL or a supplier.
- d) Gifts and hospitality should be received at an appropriate time or season and/or under appropriate circumstances when they do not influence a negotiation or business decision. Therefore, gifts and hospitality cannot be accepted during negotiation processes.
- e) Gifts are not allowed to be received at addresses other than SINTEL's.
- f) If any gift, present, or similar benefit arrives at the company's headquarters or at project sites, they should be sent to Human Resources to be later raffled among the company members at the end of each year.
- g) The payment of travel, accommodation, and per diem expenses will be allowed as appropriate and when necessary for the development of the business. In no case shall payments be made to family members or cash be provided; the related expense must be accounted for to the treasury and clearly reflect its true purpose.

X CONFLICT OF INTEREST

Employees must avoid situations in which their personal interest may conflict, or even appear to conflict, with the interests of SINTEL.

A conflict of interest arises when an Employee uses their position in SINTEL to benefit personally, financially, or otherwise (or for the benefit, financial or otherwise, of their relatives or other related persons), beyond the normal remuneration and compensation for employment offered by SINTEL. A conflict of interest also arises when an Employee's personal interests are inconsistent with those of SINTEL, creating a conflict of loyalties. Such a conflict of loyalties could cause an Employee to prioritize personal interests in situations where they should give preference to responsibilities towards SINTEL.

If a conflict arises between private interests and those of SINTEL, the Employee in question must immediately inform their immediate superior, as well as the "Compliance Officer" designated by SINTEL, so that an appropriate solution to the conflict can be found.

XI RAISING CONCERNS

Human Resources is responsible for receiving inquiries, complaints, and reports regarding possible violations of the code of ethics.

SINTEL promotes the raising of concerns in good faith (inquiries or reports) regarding a suspicious act or conduct of bribery, and guarantees confidentiality. For this purpose, the following communication channel is made available: antisoborno@sintelinternational.com

XII CONFIDENTIALITY

SINTEL staff will not disclose any data or information used in the course of their activities as collaborators, as described in the confidentiality agreements signed upon their hiring.

XIII SANCTIONS

Failure to comply with the anti-bribery code of ethics will be subject to an internal investigation and the application of disciplinary measures provided for in the Internal Work Regulations, sanctions ranging from termination of employment, cessation of commercial relationship, to initiation of legal actions if necessary.