

## ANTI-BRIBERY POLICY

Tecnología Informática GMG has solid expertise in technology, process consulting, and its clients' business operations, maintaining a firm commitment to promoting the mechanisms necessary to ensure innovation and quality in its services, as well as the confidentiality, integrity, availability, and security of information, occupational health and safety, environmental protection, and business integrity across its business lines, including specialized consulting, software application development, and the leasing of infrastructure equipment and computer hardware.

The organization operates under a process-based, risk-based, and compliance-driven approach, considering its organizational context, the needs and expectations of interested parties, and applicable legal, regulatory, and contractual requirements.

The Integrated Management System of Tecnología Informática GMG is committed to the following:

### **Compliance and Integrity:**

To comply with all applicable legal, regulatory, contractual, and other requirements, including those related to quality, environment, information security, personal data protection, occupational health and safety, and anti-bribery.

### **Prohibition of Bribery:**

Tecnología Informática GMG establishes a zero-tolerance policy toward bribery and strictly prohibits offering, promising, authorizing, requesting, or accepting any undue advantage, directly or indirectly, at any level of the organization or within its business relationships.

### **Anti-Bribery Management System:**

To implement, maintain, and continually improve an anti-bribery management system aligned with ISO 37001, which:

- Complies with applicable anti-bribery laws
- Establishes measurable anti-bribery objectives
- Provides a framework for review
- Ensures continual improvement of the system

### **Risk Management and Information Protection:**

To identify, assess, and treat risks associated with:

- Information security, ensuring the confidentiality, integrity, and availability of information assets against internal and external threats.
- Personal data (PII), ensuring proper processing in accordance with applicable legislation and preventing misuse, loss, or unauthorized disclosure.
- Occupational health and safety, preventing injuries and health deterioration through hazard identification and risk control.
- Environment, mitigating environmental impacts derived from operations and promoting responsible use of resources.
- Bribery risks, including those arising from relationships with third parties and business partners, through the application of due diligence processes proportionate to the level of risk.

### **Ethical Culture and Reporting of Concerns:**

To promote an organizational culture based on ethics, encouraging the reporting of concerns or complaints made in good faith or based on a reasonable belief, ensuring:

- Confidentiality
- Protection against retaliation
- Appropriate communication channels

### **Authority and Independence of the Anti-Bribery Function:**

To designate an anti-bribery compliance function with the necessary authority, competence, and independence, with direct access to Top Management to oversee system compliance.

### **Consequences of Non-Compliance:**

Failure to comply with this policy and the requirements of the Integrated Management System may result in disciplinary actions, termination of employment or contractual relationships, and legal actions in accordance with applicable laws.

**Quality and Customer Satisfaction:**

To ensure compliance with customer requirements and increase customer satisfaction through the continual improvement of processes and services.

**Information Security and Data Protection:**

To protect information against loss, misuse, unauthorized access, disclosure, or destruction, ensuring proper management of personally identifiable information (PII).

**Occupational Health and Safety:**

To provide safe and healthy working conditions, preventing injuries and health deterioration.

**Environment:**

To protect the environment, including pollution prevention and the sustainable use of resources.

**Equality and Inclusion:**

To promote an inclusive, equitable, and discrimination-free work environment, ensuring equal opportunities.

**Communication and Availability of the Integrated Management System Policy:**

In compliance with applicable regulations, this policy:

- Is maintained as documented information
- Is communicated at all levels of the organization
- Is available to relevant interested parties
- Is communicated to business partners that represent more than a low risk of bribery

**Responsibility:**

All employees, executives, and third parties acting on behalf of Tecnología Informática GMG are responsible for complying with this policy and contributing to the effective performance of the Integrated Management System.

**Continual Improvement:**

Top Management ensures the periodic review of this policy to guarantee its relevance, alignment with the organization's purpose, and continual improvement of the Integrated Management System.

