



# CODE OF ETHICS AND CONDUCT

## INTRODUCTION



Grupo STT, offers comprehensive outsourcing services, so that companies can dedicate themselves to their business and have access to operational support that allows them to settle and operate safely and reliably in the country where they want to have presence.

GRUPO STT has assumed the commitment to manage its businesses worldwide adhering to the ethics and integrity, complying with laws, rules and regulations in force in the countries where it maintains presence and also complying with the rules established in this Code of Ethics and Conduct.

Our Purpose with Grupo STT's Code of Ethics and Conduct is to ensure that all our partners, business allies and, employees understand and comply with the strictest standards of ethics and conduct, which allow us to provide clients with quality, service and value of excellence.

## GENERAL PRINCIPLES OF PERFORMANCE:



STT's employees based on our Values, will perform in line with the following principles: Ethical Conduct, Professionalism and Confidentiality.

### Ethical Conduct:

Act with independence, moral integrity and respect for people in the development of their daily activity.

### Professionalism:

STT's employees must be recognized by their high degree of professionalism.

### Confidentiality:

It is understood that STT's employees perform their duties within a professional framework, both internally as in their relations with third parties, under strict and permanent confidentiality with respect to information whose disclosure may affect Grupo STT's interests.

## LIMITATIONS AND OBSTACLES:



### STT's employees will have the following limitations:

They may not hold positions, functions or duties in competing companies or legal firms, companies providing goods and services or in companies that hold a form of dominance or control in competing companies.

Previously consult STT the acceptance of any position, designation or appointment outside the Company, which may condition its independence and professional dedication to the company.



## FIGHT AGAINST CORRUPTION



Grupo STT de CR opposes to corruption and bribery, and does not tolerate practices aimed at doing business through unlawful means. No STT employee is allowed to offer to persons or entrepreneurs any type of benefit. As well as receiving any type of benefit that may jeopardize the ability to make objective and equitable business decisions.

## INSIDER TRADING



STT requires its employees to refrain from insider trading. This prohibition applies in particular to employees who have access to non-public information about STT, clients or companies to which the company provides its services.

Such inside information may relate, for example, to: plans; new products or processes; mergers, acquisitions or divestitures of business areas or securities; problems affecting Grupo STT or a company with which it carries out commercial operations; sales; profitability; negotiations concerning significant contracts or business relationships; relevant litigation; or financial data.

## FAIR WORKING CONDITIONS



STT is committed to provide a work environment in which diversity and richness of a diverse culture is valued. STT respects each individual and promotes an open exchange of opinions, criticism and ideas. STT is committed to provide equal employment opportunities to all people, and does not tolerate forms of discrimination (age, ethnicity, religion, sex, sexual orientation, political opinion, origin, disability or any other form of discrimination) or harassment of any kind. Threats or acts of violence and physical intimidation are prohibited.

## CONFLICT OF INTEREST



A "conflict of interest" arises when the judgment of a worker, and the integrity of its actions with respect to his functions in the company, tend to be unduly influenced by a secondary interest, which is often of an economic or personal nature. Conflicts of interest can arise in numerous situations that require special attention, including but not limited to the following:

- a. Employees should not receive undue personal benefits as a result of their positions.
- b. All employees must not make use of corporate property or information, or take advantage of their position for their own benefit, or compete with the company directly or indirectly.
- c. Employees will not be able to exercise as directors, employees or advisors of external organizations that may adversely affect their motivation or performance, unless such service has been specifically approved by the company.
- d. STT encourages its employees to participate in the provision of services in their respective local communities and in charitable activities. However, it should be ensured that all external activities, including charitable or honorary activities, do not give rise to conflicts of interest or are incompatible with their employment in the undertaking.
- e. Employees must inform STT about the intention of getting involved in positions related to the central or decentralized public administration and any other government institution or that has partial or total public funds.
- f. Collaborators will not be allowed to receive by reason of the exercise of their functions from third parties, gifts, promises, or any real value.
- g. Any actual or potential conflict of interest should be communicated to and discussed with the appropriate superiors.

## RECORDS —AND— REPORTS

STT applies the highest standards when it comes to the recording of information. All financial statements and books, records and accounts of the company – whether kept in electronic or printed format – shall accurately reflect operations and events, and comply with both legal requirements and accounting principles and also with the company's internal accounting system. The issuance of false reports within the company, or to organizations or persons outside the company, is strictly prohibited.

STT undertakes to provide complete, accurate, timely and comprehensible information in all reports and documents which it is required to submit under national law and in its other public communications.

## PROTECTION AND APPROPRIATE USE OF ASSETS



Employees collectively have a responsibility to safeguard STT's assets and to put them to appropriate and efficient use. In addition, each employee has an obligation to protect STT's property from loss, damage, misuse, theft, embezzlement or destruction. Any situation or incident that may give rise to such a result, must be immediately communicated to its superior or manager.

## CONFIDENTIALITY



Business information is confidential or subject to proprietary rights, and such confidentiality must be maintained, except in the event that its disclosure is authorized by STT or required by law or regulation.

These rules apply specifically to intellectual property, such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, engineering and manufacturing expertise, designs, databases, records, salary information or any unpublished financial data and reports.

It is STT's policy that all personal information about employees, clients, partners, entrepreneurs or suppliers is used diligently and treated confidentially, respecting the right of the data owners.

# COMPLAINTS

Any collaborator of GRUPO STT or interested third party which has concerns or complaints about the content of this Code, including possible violations of it, must escalate the consultation to the Department of Ethics and Regulatory Compliance to the following mail [cumplimiento@grupostt.com](mailto:cumplimiento@grupostt.com)

Retaliation against talents who file an ethical inquiry or complaint will not be tolerated. Ethics consultations must be submitted under a principle of good faith, and STT through the Department of Ethics and Regulatory Compliance undertakes to give it the appropriate follow-up, but reserves the right to sanction those talents who, knowing the falsity of their statement, initiate the investigation process.

## ASSUMPTION OF RESPONSIBILITIES

All staff as well as members of the Board of Directors are obliged to comply with the rules established in this Code. Violations of the Code will result in consequences. In serious cases, such consequences may include termination of the post and the employment relationship in accordance with applicable employment law.

