



Ethics Code

AN

CONTENT

LETTER FROM THE CHAIRMAN OF THE BOARD AND THE CEO	3
OUR ETHICS CODE	4
WHO SHOULD FOLLOW OUR CODE?	4
MISSION AND VISION	4
SHARED VALUES	5
I. COMMITMENT WITH STAKEHOLDERS	6
II. OUR CONDUCT	7
A. SUPPORT AND MUTUAL RESPECT	7
B. SAFE WORK PLACE	7
III. OUR WORKSTYLE	8
A. ETHICS REGARDING CLIENTS	8
B. ETHICS REGARDING SUPPLIERS	8
C. ETHICS REGARDING COMPETITORS	9
IV. WE AVOID CONFLICTS OF INTEREST	9
A. REGARDING GIFTS	9
B. OUR POSTURE REGARDING BRIBES AND CORRUPTION	10
C. MONEY LAUNDERING	10
D. FRAUD	11
V. CONFIDENTIALITY AND USE OF RESOURCES	11
A. CONFIDENTIALITY OF INFORMATION	11
B. RESOURCES	12
C. ASSETS	12
D. SOFTWARE AND COPYRIGHT	12
VI. ENSURE INTEGRITY AND FINANCIAL RESPONSIBILITY	13
VII. COMPLIANCE WITH LAWS	13
VIII. WHAT TO DO IN CASE OF NON-COMPLIANCE?	13
IX. SUSTAINABILITY MODEL	14
X. CONCLUSIONS	14



LETTER FROM THE CHAIRMAN OF THE BOARD AND THE CEO

At AN, we intend to be a force of change and improvement for our customers, our investors, ourselves, the communities in which we operate and in general, for a more sustainable and fairer world.

We do this by committing ourselves with our customers in the continuous pursuit to generate value; we do this through our passion, which guides us to be better every day and take on the future as a team effort.

We are defined by our actions, by what we decide, and by why we do it. Our actions are the image of what we are, regardless of what we declare.

In all organizations -including AN-, the formal culture and the declared values are faced by the actions of its members at all times.

Our mission can only be achieved with an impeccable reputation. These is, what creates the conditions for which our customers choose us, for our investors consider us, for our talent to nurture and evolve, and for the communities in which we develop our businesses, to take pride in our projects.

Our actions define our reputation.

The hyper-competition in the markets and the pressure to achieve short-term results could tempt us to choose paths that seem shorter in order to achieve our goals, but in fact, push us away from the possibility of transcending as a company. We need to identify and avoid those deviations.

This Ethics Code helps us create the appropriate context to act, providing clear and understandable principles that guide our behavior and decision-making process.

This Code applies to board members, officials, collaborators, representatives, and partners; it is important that each of us read it, understand it, and apply its principles. Keep it with you and review it regularly, and please do not hesitate to ask if you have any question regarding its content or applicability.

Alongside other tools, the Ethics Code helps us protect our reputation of integrity and to comply with our company promise.

As AN members, we have the company's reputation in our hands, and we should feel proud of it.

Thank you.

Manuel Senderos - President of the Board of Directors
Federico Tagliani - CEO



OUR ETHICS CODE

The AN Ethics Code provides us with clear principles to guide our behavior and empower our decision-making based on doing the right thing. This implies the guarantee that everything we do at AN in relation to our work, meets the highest standards of ethical business conduct. The commitment we have with these standards throughout the organization is reflected through the hiring of outstanding people, interacting and coexisting in a healthy manner, offering quality services and solutions, and maintaining long-term relationships with our customers.

The trust and respect that exists between employees and customers is the basis of our success and reputation. Day by day, we seek to live a positive experience based on our values; acting with honesty, treating everyone with courtesy and aspiring to the common good.

Live and share this Code. Each one of us is responsible for incorporating and encouraging everyone else to follow these principles in our work. Exemplarity is the best strategy in transmitting the values and beliefs that are the essence of this Ethics Code.

WHO SHOULD FOLLOW OUR CODE?

This Code applies to all employees globally -including board members-, without exception. Suppliers, consultants or other persons assigned to AN, even on a temporary service, must apply this Ethics Code in the same way AN employee does.

You can find this Code in the corporate SharePoint repository. However, keep in mind that it may be modified or updated from time to time, and our commitment as AN collaborators is to review it regularly.

MISSION AND VISION

Be an enabler of digital transformation
empowering our clients to reach exponential
development

MISSION

Extend our global presence and be recognized as a
leading company in information technology

VISION



SHARED VALUES

EXCELLENCE

We seek to be the best in everything we do. Our focus is in the creation of value, generated by our collaborators, appreciated by our customers and respected by our competitors.

INNOVATION

We are creative and capable of generating outstanding solutions -or modifying the existing ones-, seeking to always create more value for our customers.

INTEGRITY

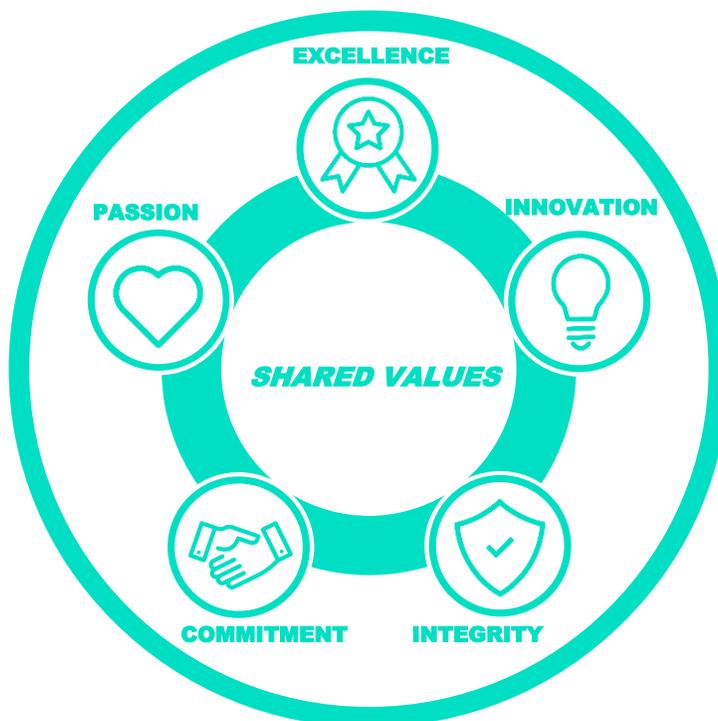
We are upstanding and honest in everything we do. Whether with our customers or with our collaborators, we always seek for our actions to be fair.

COMMITMENT

We honor our word and answer for our actions.

PASSION

We commit 100%, we are excited about what we do, and we have a conviction to always excel in customer service.





I. COMMITMENT WITH STAKEHOLDERS

The stakeholders - listed below-, are the groups of interest associated with the company whom we value, which is why, trust, honesty, respect, courtesy and transparency in communication are fundamental in establishing long-lasting relationships with them.

STAKEHOLDER	WHAT DO WE COMMIT OURSELVES TO?	WHAT DO WE EXPECT FROM THEM?
SHAREHOLDERS	To manage diligently and professionally in order to ensure a fair and competitive performance.	Trust in the management, experience and resources for the development of the corporate purpose of the company.
ASSOCIATES	To provide a dignified job with a competitive salary, opportunities for growth and training, good working environment and balance between work and personal life.	Meeting their work obligations with a positive attitude, responsibility, integrity, creativity, discretion, honesty, effort and adherence to the Code of Ethics.
CUSTOMERS	To treating them with dignity, honesty and respect by providing products and services of the highest quality with benefit, seeking to exceed their expectations and needs.	Openness, service feedback, fair treatment, reciprocity, long-term relationships.
SUPPLIERS	Fair and equitable treatment, long-term relationships with fair conditions, punctual payment and promoting excellence both ways.	Quality of service, efficiency, timeliness, compliance with agreed conditions.
COMPETITORS	To maintaining a cordial and respectful relationship, encouraging the best practices, marketing services according to our merits, without issuing unfair or misleading statements about the services of our competitors.	Cordial relationships and respect, fostering a competitive environment for improvement and development of best practices.
PROFESSIONAL ASSOCIATIONS	To contribute as corporate citizens in the integral development of communities and best practices in our scope of activities.	Collective representativeness towards a common goal that seeks a better business environment.
AUTHORITIES	To comply with our tax, labor, environmental and social obligations for the wellbeing of our stakeholders.	Fair and equitable treatment, expeditious procedures.
COMMUNITY	To coexist in a harmonious way with our neighbors and contribute with what is within our reach to nonprofit organizations.	Ease to do our job, open dialogue to attend to and solve any problems.



II. OUR CONDUCT

Exemplarity is the best strategy for transmitting the values and beliefs that come to life in our Code of Ethics. All employees and representatives of AN accept our personal responsibility to:

- Carry out our work with honesty, professionalism and integrity, behaving according to the terms and spirit of this Code.
- Take the time to read and understand the Ethics Code and the consequences that result from its non-compliance.
- Communicate the existence of this Ethics Code to colleagues, subordinates and superiors.
- Have a respectful, friendly and clear communication with everyone - internal or external- by any means.
- Not try to indirectly achieve what is forbidden to do directly.

A. SUPPORT AND MUTUAL RESPECT

We are committed to maintaining an environment of respect and support. At AN we experience a business culture of equal opportunity, equity, free from discrimination, harassment and intimidation of any kind, always demonstrating:

- Respect and compliance to customs and habits, both in AN as well as with our customers.
- An environment free of violence or discrimination, without offensive or persecutory intentions.
- Professional treatment of colleagues and third parties, with ethics, modesty and courtesy.
- Diversity and inclusion, respecting the personal values of employees, representatives, suppliers and customers.

No collaborator or representative of AN should take unfair advantage of another person through manipulation, concealment, abuse of privileged information, false declaration of substantial facts or any other unfair practice.

At AN, discriminating against any person because of their ethnic origin, race, nationality, religion, gender, age, different abilities, sexual orientation or any other reason is not permitted.

Any related act must be reported and will be sanctioned according to the measures AN considers appropriate for each specific case.

B. SAFE WORK PLACE

We are committed to a violence-free work environment and will not tolerate any aspect of violence. Our environment is safe, and it is our responsibility to promote it that way.

- The abuse of illegal or alcoholic substances goes against the health and safety of employees, therefore it is not allowed. It is forbidden to be under the effects of these substances during work activities, whether in corporate, suppliers or customers' offices.
- It is strictly prohibited to carry weapons inside the workplace.
- At AN it is forbidden to sexually harass co-workers, subordinates, direct managers, managers or any collaborator inside or outside the company, in any way.

If there is a violation of these guidelines, you must report it immediately to ethics@anglobal.com or to +52 (55) 5258 1414 Ext. 3380.



III. OUR WORKSTYLE

At AN, we are committed to working in a transparent, honest and integral way. We all have the same opportunities when a recruitment, promotion or recognition is offered, based solely on individual merits and qualifications directly related to professional competence.

The handling of personal and professional information of collaborators is governed by the Privacy Notice. Find it at www.anglobal.com and act based of the described guidelines. We all respect the confidentiality of such information, so it should not be shared with customers, suppliers or any other entity without obtaining prior authorization from the collaborator.

Remember to comply with the highest quality standards in any activity with our colleagues, clients and suppliers.

A. ETHICS REGARDING CLIENTS

In every commercial transaction with our clients, we act without preferential or discriminatory treatment. We take into account the needs and trends of the market in order to offer high quality solutions and comprehensive services.

Before signing any contractual agreement on behalf of AN, the Legal and Pricing areas must be involved to ensure that such agreement is competitive and within the legal framework of the valid laws of the corresponding country. Any agreement - verbal or written-, must be included in the proposal and/or contract.

During any commercial process, both the employees and the representatives involved, should strictly adhere to the AN Confidentiality Policy in order to safeguard the information shared by the client and that which is generated during their relationship with the company. In case a non-disclosure agreement (NDA) is requested, it must be signed by the parties involved and respected in its entirety.

If you think that our clients are not being well looked after or have any request or complaint, please inform someone in the company. You must contact your immediate Manager, the Human Resources area or send an email to ethics@anglobal.com. Continuously improving our solutions and services is everyone's commitment. We take pride in the fact that anyone can take the initiative to take a step forward when the interests of our clients are at stake.

B. ETHICS REGARDING SUPPLIERS

Our relationship and conduct with suppliers are carried out with absolute integrity and adherence to this Ethics Code, where taking care of AN interests is the most important consideration.

All suppliers must go through the established internal selection process. It is our responsibility to ensure, that suppliers and/or external consultants comply with the requirements of the law, that they have a formalized contract with our Legal area, that they adhere to each of the policies, processes and contracting procedures stipulated by the company (processes of PO and entry of merchandise) and that the payments are strictly related to the activities stipulated in the contract.

All agreements must be concluded in writing. The procurement department reserves the right to stop the purchase process if they find any irregularities in it.

No one can be forced to purchase products or services from a specific supplier, even though it may seem like an exchange with the products or services that AN commercializes.



Suppliers should not take any actions against this Ethics Code. If this should occur, no agreement or relationship can be made.

C. ETHICS REGARDING COMPETITORS

Associates and representatives may gather, share and use information on competitors as long as it's done in a legal and ethical way, while always respecting non-public information of other companies.

AN's Legal Advisor should be consulted on the guidelines to understanding the specific laws and competition policies that apply in each country.

IV. WE AVOID CONFLICTS OF INTEREST

Finding yourself in a commercial situation in which you, a friend or a relative could perceive a personal benefit at the expense of AN or our clients, is considered a situation of conflict of interest.

We must all avoid conflicts of interest and circumstances that could appear as a conflict by acting in an honest and ethical manner in favor of the interests of AN. In the list that follows, we indicate areas in which conflicts of interest could arise and therefore we must pay close attention:

- When detecting business opportunities of any kind through our activities at AN.
- In situations where personal and/or financial interests generate conflict with those of AN.
- During secondary work that negatively impacts work responsibilities or generates a conflict of interest at AN.
- When accepting gifts, entertainment and other commercial courtesies.
- The use of AN products and services.
- When managing confidential information, both of AN and of our customers.

In the case a direct family member -or up to the second degree- of the representatives and associates of AN provides their services within the company and/or with competing companies or within our stakeholders, the procurement department must be notified.

A. REGARDING GIFTS

AN associates and representatives may offer meals or invite prospective and current clients, suppliers, competitors or business partners to events as long as these serve to promote or improve business relationships in the interest of AN. These must be consistent with the business customs of each country, and as long as these acts do not affect decisions or go against the ethical principles of AN.

- Regarding invitations out to eat or to events, we must follow the guidelines established by AN. To learn about authorizations, amounts and number of guests, go to the Travel Expenses Policy. If a guest has a close personal connection with the associate, it must be ensured that this person is not included in the cost of the client, provider, competition or partner.
- It is considered an acceptable practice to provide occasional gifts and invitations, as well as discounts and free services -for reasons of commercial promotion- to non-governmental employees.



- The gifts, invitations and commercial promotions mentioned above must be infrequent and in principle. No gift can exceed the amount of \$1,500.00 (one thousand five hundred Mexican pesos) or \$80.00 USD (eighty US dollars), depending on the exchange rate. No gifts may be provided to any family member, friend or anyone who has a close personal connection with existing customers, suppliers, competitors or business associates.

It is prohibited for employees and representatives of AN, their family members, friends, or any personal relationship, to accept gifts in kind, payment, loan, vacation or any other privilege from a current client, prospect, supplier, competition or partner where:

- The gift has a value greater than \$ 1,500.00 (one thousand five hundred Mexican pesos) or \$ 80.00 USD (eighty US dollars) -depending on the exchange rate-, or may be against any business interests of AN.
- The gift is given during a negotiation, tender or contest; directly or indirectly by any of the parties involved in that process.
- The acceptance of the gift could bring the impression of an unjustified advantage.
- The gift is illegal or contrary to the ethical principles and values of AN or is related to previous gifts.

B. OUR POSTURE REGARDING BRIBES AND CORRUPTION

Anti-corruption laws.

At AN we adhere to the local anti-corruption laws in the countries where we operate or have commercial relationships. We are committed not to act or be part of acts of bribery, corruption or money laundering.

Acts of corruption / bribery.

We believe that corruption is any action or act of omission in order to obtain personal benefits or for a third party. Any type of offer or receipt of special favors, money, bonds or other types of valuables is considered bribery.

Influence.

Offering a favor with the intention of influencing a business decision is not appropriate. Remember that favors can include things like making donations to charity, politics or providing job offers. This is why, we must keep all activities and financial transactions documented.

C. MONEY LAUNDERING

Everyone at AN should be alert to any situation or circumstance that could have the purpose of laundering money from illicit activities through a series of transactions to give the appearance that it comes from legitimate sources. Some examples of this are:

- Customers, suppliers or partners that do not provide personal business information.
- Those who wish to pay with large amounts of cash.
- Those who wish to receive funds or disburse funds in various accounts.



- Those who do not seem to care about prices, commissions or other costs of the transaction.

This activity is illegal and with criminal consequences depending on each country's laws, so it must be avoided and rejected at all costs.

D. FRAUD

Either we are committed not to incur in any action that could constitute any type of fraud against the organization, by a personal act or by a third party, carried out intentionally or through negligence.

Our rule is simple: Do not make any kind of bribery or participate in any corrupt activity at any time and for any reason.

We have the responsibility to report any action of bribery and corruption that we detect in our work areas. If there is any violation of these guidelines, you must report it immediately to ethics@anglobal.com or +52 (55) 5258 1414 Ext. 3380.

V. CONFIDENTIALITY AND USE OF RESOURCES

A. CONFIDENTIALITY OF INFORMATION

The protection of confidential information is of essence for the growth of AN and its ability to compete. Therefore, we should not distribute documents and information to third parties. Regardless of the role at AN, each stakeholder signs a non-disclosure agreement (NDA) upon entering the company.

As service providers to our customers, AN also has the responsibility to respect the confidentiality of customer information. For this reason, we make sure that anyone outside AN or third parties cannot obtain such information, always following the confidentiality norms of the client and those specified in the Confidentiality Policy.

Without exception, in each of our projects and with each of our clients, we sign the non-disclosure agreement (NDA), adhering strictly to the AN Confidentiality Policy in order to safeguard the information shared by the provider and that which is generated during its relationship with AN, considering:

- Making sure that confidential printed information is not left unprotected or in view of those who do not need to know it.
- Destroying any printed confidential information before it is sent to recycling or trash.
- Avoiding the use of personal mail for work-related activities. Express permission will be granted to use a personal email to whom it is necessary in the case that the AN mail cannot be accessed for a prolonged period of time.
- Not using personal communications to send the client's own information, as it may have legal repercussions for the collaborator and AN.
- Treating usernames and passwords for internal, personal and customer systems as confidential information. User names and passwords may not be written or saved on paper at any time.
- Using the computer equipment in a responsible manner as a source of confidential information and safeguarding it at all times by using a physical padlock and blocking the equipment when it is not in use.

It is unlawful to use confidential information related to AN (operations, financial situation, results, success stories or relevant events), as well as to provide privileged information or offer advice or suggestions to any person outside the AN collaborators or clients for personal purposes.



B. RESOURCES

All of us at AN make sure we use the company's resources properly.

AN provides technological resources such as: laptops, e-mail, mobile telephones and landlines, voice mail and Internet services for business development purposes for the company. In certain exceptions, employees and representatives can use this infrastructure for brief and minimal personal communications. These technological resources cannot be used for:

- Illegal activities
- Disrespectful and discriminatory communications
- Personal business
- Gambling
- Uploading or downloading software that violates copyright laws
- Downloading software that may compromise the logical or physical security AN and our stakeholders
- The use of internet radio streaming, downloading music or watching videos

As all electronic communications are considered property of AN, the content of the computer and/or email can be audited at any time.

All of the emails sent from an account must contain the following legend: "The content of this e-mail and its attachments may be CONFIDENTIAL, and is for the sole and exclusive use of the recipient, so its total or partial disclosure to any unauthorized third party is prohibited. The opinions expressed here are the responsibility of the sender and are not necessarily shared or supported by AN GLOBAL, unless such information is confirmed in writing by an authorized representative. You can check our full Privacy Notice at WWW.ANGLOBAL.COM"

C. ASSETS

We are responsible for the safekeeping of any physical or intellectual asset that is under our control. We must not participate, influence or allow situations and/or actions that imply decisions without authorization of mistreatment, abuse, loan, disposition or sale of any asset of AN.

It is the responsibility of each collaborator to protect of any loss, theft or misuse any asset of AN (materials, equipment, vehicles, supplies, financial resources, non-public information, computer resources including hardware, software and information on them, etc.), since these events have a direct negative effect on the activities of AN.

The theft of any assets of AN -whether physical theft or through embezzlement- as well as any intentional false information of hours or expenses, may result in the total or temporary separation of the position and/or criminal prosecution.

If you identify or have any suspicion of loss, theft, or improper use of the confidential information of the company or our customers, including assets and software, please report it immediately to ethics@anglobal.com or to +52 (55) 5258 1414 Ext. 3380.

D. SOFTWARE AND COPYRIGHT

AN acquires licensing for the use of software protected, by copyright laws that prohibit copying and distribution of these without the express permission of the manufacturer. Each collaborator has the responsibility to ensure that the IT resources



under their control have legally complying corporate software; under no circumstance, should it be copied, installed or distributed outside the list approved by the IT area or that could violate any copyright laws.

VI. ENSURE INTEGRITY AND FINANCIAL RESPONSIBILITY

Each of us at AN, and not only the Finance department, have the role of ensuring that the money is spent or invested properly. This is important every time we hire a new supplier, an expense is made, a commercial agreement is signed or any business is conducted in the name of AN. The company maintains a system of internal controls to reinforce our compliance with legal, accounting, fiscal and other regulatory requirements in all the places where we operate.

We comply with our internal controls, and protect and use the resources of the company wisely.

VII. COMPLIANCE WITH LAWS

AN is responsible for complying with and abiding by the laws, rules, regulations and ethical requirements of each country in which it has a presence or business relationships. Even when local laws or customs may differ, all of us and the people related to the company, must comply with this Code.

VIII. WHAT TO DO IN CASE OF NON-COMPLIANCE?

In case you detect any ethical conflict or violation of this Code, your responsibility is to raise your hand. At AN there are no reprisals against reports or complaints of this type. We encourage everyone to communicate with the objective of taking care of our culture. In these cases, you can contact:

- Your immediate Manager
- A representative of the Human Resources area
- A representative of the Legal area
- +52 (55) 5258 1414 Ext. 3380
- Corporate Ethics Committee through ethics@anglobal.com

The Corporate Ethics Committee is made up of representatives of the Human Resources area, the Legal area and other members of the Organization who are responsible for regulating this Code, advising on any type of doubt and determining the relevant consequences in case of any breach.

Complaints will be handle with strict confidentiality and will be investigated it by the Corporate Ethics Committee to ensure its accuracy.

Type of complaint	Description	Suggested complaint Medium
Not Confidential	Complaints related to faults in the Internal Regulation, Ethics Code and policies/processes that may be carry out in an open manner.	-Email: ethics@anglobal.com -Phone line: +52 (55) 5258 1414 Ext. 3380



Confidential	Anonymous complaints related to conflicts of interest that may put the permanence and harmony of the employees at risk.	-Phone line: +52 (55) 5258 1414 Ext. 3380
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Failure to comply with this Code of Ethics may result in sanctions or termination of the relationship with AN. These actions apply in the same way to any leader and manager that allows or fails in the prevention, correction or other action against illegal, unethical or inappropriate behavior. For more information, you can refer to Annex 1 - Catalog of Sanctions.

IX. SUSTAINABILITY MODEL

- For AN, sustainability contributes to the creation of long-term value for the shareholders, our customers and our operations with: profitability, efficiency, innovation and execution of solutions to solve today's problems.
- Our passion, leadership, dedication and customer focus allow us to offer integral solutions to improve our world and the development of future generations.
- Sustainability is a way to mitigate risks by maintaining a social, economic and environmental balance, as well as contributing to caring for our planet.
- Our sustainability strategy of "Creation of Sustainable Value" focuses on 4 pillars: One of the best places to work, Environmental Performance, Sustainable Eco-services and Social Impact.
- Our Model represents the road to continue evolving as a business with an integral and sustainable structure.

X. CONCLUSIONS

The Code is your guide to conduct yourself ethically at AN and with all the entities with which we have relations. Do not hesitate to ask for advice if any circumstance or situation is not clear and you have doubts on how to act.

You are the main person that can help us achieve a respectful, mutually supportive culture that seeks common welfare. Let's enjoy the AN experience together.

