

Supplier Code of Conduct

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I. Introduction

Globant S.A. (together with its affiliates, hereinafter indistinctly referred to as “Globant” or “we”) is committed to conducting its business ethically, with honesty, integrity and in compliance with all applicable laws. The purpose of this Supplier Code of Conduct is to outline the standards and principles that any supplier, their employees, agents and subcontractors (“Suppliers”) working with Globant are required to uphold and fully comply with. This Code of Conduct complements Globant’s Code of Ethics, and details more specific commitments our Suppliers must comply with. We expect our Suppliers to adhere to this Code of Conduct as well as to our [Code of Ethics](#), and to implement them across their own supply chain. This Code of Conduct may be updated by Globant’s General Counsel, and the latest version can be accessed through [this link](#).

II. Our principles

1. Regulatory compliance

We expect our Suppliers to conduct their business in full compliance with both the letter and the spirit of all applicable laws, rules and regulations. This includes compliance with regulatory requirements regarding the following matters specifically:

Anti-Corruption: Suppliers have to work in full compliance with [Globant's Anti-Bribery and Anti-Corruption Policy](#), the U.S. Foreign Corrupt Practices Act ("FCPA") and any anti-corruption regulations that govern the jurisdictions in which Suppliers conduct business. Suppliers shall prohibit all forms of corruption, bribery and fraud, and shall never, under any circumstance, directly or indirectly, promise, authorize, offer, or pay anything of value (including but not limited to gifts, entertainment, travel, donations, contributions or employment) to any third party to improperly influence any act or decision of such third party for the purpose of promoting Globant's business interests.

Anti-Money Laundering: Suppliers must comply with all applicable anti-money laundering and counter-terrorist financing laws and must neither engage in nor assist any third parties with these crimes. Suppliers shall implement appropriate due diligence processes to ensure any subcontractor working in the provision of services for Globant has not been involved in these crimes.

Antitrust: All of Globant's Suppliers shall conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they conduct business. This includes laws and regulations related to illegal cartelization and information sharing with competitors.

Trade: Suppliers shall comply with all applicable international trade controls and local rules, regulations, and controls on any technology transfers (physical and/or electronic), exports, re-exports, and imports.

2. Human rights and fair labor practices

All Suppliers must fully comply with employment laws, uphold human rights, and promote an inclusive work environment. Furthermore, Suppliers shall obtain similar commitments from their own suppliers, subcontractors, and distributors. This commitment includes:

Labor and Human Rights: Suppliers shall promote and uphold fundamental human rights as set out in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the UN Global Compact Principles. All Suppliers must comply with applicable labor regulations, including standards set out by the International Labor Organization, regarding all labor aspects and specifically what pertains to minimum age and child labor, freedom of association, right to organize and to collective bargaining, abolition of forced and compulsory labor, the promotion of equal remuneration and the prohibition of discrimination at work.

Diversity and Inclusion: We expect our Suppliers to value diversity, create an inclusive work environment, and comply with all applicable accessibility standards. Suppliers must be committed to ensuring gender equality in their workplace.

Anti-Discrimination: Suppliers must not engage in any form of discrimination against workers based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other protected status as defined by applicable international or local laws. This applies to all aspects of employment, including hiring and other day-to-day practices.

Anti-Harassment and Abuse: Suppliers are required to maintain a workplace that is free of harassment and abuse. This includes prohibiting any form of harsh and inhumane treatment towards workers, such as verbal abuse, psychological harassment, physical aggression, and sexual harassment. Suppliers must ensure a safe and respectful environment for all employees, fostering a culture that rejects any form of mistreatment or misconduct.

Health and Safety: Suppliers shall implement appropriate measures to ensure compliance with all applicable regulations regarding health and safety in order to prevent accidents and injury to health arising out of, linked with, or occurring in, the course of work.

Prohibition of Forced Labor, Child Labor and Human Trafficking: All forms of forced labor are prohibited, including indentured labor, bonded labor, or any other form of forced labor. Suppliers must not use, encourage or engage in child labor. Child labor means labor that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical or mental development. Suppliers also must neither use, encourage nor engage in human trafficking.

3. Ethical business practices

Suppliers must always act in an honest and transparent manner while doing business with Globant or on behalf of Globant. This includes complying with the following principles:

Business Records: Suppliers are expected to keep accurate books and records in compliance with standard accounting practices. Suppliers must ensure that all representations and statements are truthful and shall submit accurate invoices to Globant.

Conflicts of Interest: Suppliers must avoid conflicts of interest, and are required to disclose any potential conflict of interest situation to Globant. Suppliers must refrain from engaging in any transactions or interactions with any Globant employee whose spouse, domestic partner, other family member or relative holds a financial interest in the Supplier, unless such transactions or interactions, as applicable, have been priorly approved by Globant's Legal Department.

Contracts: Suppliers must meet and comply with all terms and conditions outlined in services proposals accepted by and/or contracts signed with Globant.

Gifts and Entertainment: Suppliers must refrain from offering any gifts or entertainment to gain an improper business advantage, and shall not accept any kind of gift that could potentially create the appearance of impropriety. Gifts, meals, entertainment, and trips must always be appropriate, of moderate value and for a bonafide business purpose.

Government Interactions: Suppliers may only interact with government officials (including employees of government agencies or government instrumentalities) on behalf of Globant after obtaining prior written approval from Globant. In the event such interactions become necessary, Globant will provide comprehensive instructions that the Supplier must strictly adhere to. Additionally, it is the responsibility of the Supplier to ensure that employees involved in these interactions have received appropriate training.

Public Statements: Suppliers must not speak on behalf of Globant in any public capacity, including interactions with the press, on social media platforms, among others, except with our prior written consent.

4. Protecting information and IP

As part of our business relationship, Suppliers may have access to confidential information that should be safeguarded according to the following standards at minimum:

Confidential Information: Suppliers must maintain strict confidentiality regarding all information they have access to during the course of their work. Suppliers must take all necessary measures to prevent misuse, theft, fraud, or unauthorized disclosure of our information. Suppliers bear direct responsibility for safeguarding Globant's information from any potential damage, loss, or unauthorized access, and ensuring its secure custody.

Personal Information: Suppliers must comply with all applicable data privacy and protection laws. Furthermore, suppliers are required to follow Globant's guidelines (whether set forth in contractual documentation or in additional written instructions) whenever they access personal information as part of their work with the company.

Intellectual Property: Suppliers are expected to respect and protect Globant's intellectual property rights, and shall only use software that has been legitimately acquired and licensed in accordance with their associated licenses or terms of use. Suppliers shall not use Globant's name, logo or other trademarks without prior written authorization from a Company legal representative.

Insider Trading: Suppliers must comply with applicable insider trading laws. If Suppliers become aware of material, non-public information relating to Globant or its business, they are strictly prohibited from

engaging in any trading activities involving securities of Globant. This includes refraining from purchasing, selling, or trading such securities.

5. Corporate Social Responsibility

Suppliers are required to implement or have a clearly defined action plan to implement within a reasonable timeframe agreed with Globant:

- A comprehensive Corporate Social Responsibility (CSR) policy that encompasses social, environmental and economical aspects tailored to the size and nature of the Supplier's business.
- Clear CSR commitments aligned with the principles of UN Global Compact. These commitments should refer to their own initiatives or be part of initiatives launched by their respective sector or industry.
- Integration of standards and guidelines that guide CSR policies, such as ISO 26000, or of relevant reports, such as Global Reporting Initiative (GRI).

Environmental Responsibility: Our Suppliers must develop, implement and maintain environmentally responsible business practices, complying with all environmental regulations as well as applicable industry standards, aligned with our [Environmental Policy](#). Suppliers shall obtain, keep current, and comply with all required environmental permits and reporting requirements of applicable permits and regulations regarding hazardous materials, GreenHouse Gas (GHG) emissions, waste management (reduce, reuse, recycle, and correct disposal) and water management. Suppliers should also make practical efforts to minimize the use of natural resources, and where possible be renewable or sustainably sourced.

We expect our Suppliers to have an understanding of the environmental risks, impacts and responsibilities associated with the products and services they provide, and work towards implementing an effective environmental policy, statement or program to mitigate environmental risks, monitoring their environmental performance and making continuous improvements through practicable measures employing leading practices where possible.

III. Training and communication

Suppliers are responsible for creating and upholding appropriate policies, procedures, training and awareness programs to ensure compliance with the principles outlined in this Code of Conduct, as well as with all applicable laws, rules and regulations. Suppliers must effectively communicate these principles to their employees and manage compliance with this Code of Conduct. Globant reserves the right to request and assign specific regulatory compliance training for relevant personnel of the Supplier, if deemed appropriate.

IV. Audits

Globant may request information and documentation from Suppliers to verify their compliance with this Code of Conduct. Suppliers must respond to such requests in a timely manner and within a maximum period of 10 business days from the date of receiving the request.

Globant may conduct audits, at its own expense, to assess Suppliers' compliance with this Code of Conduct. Such audits may take place once a year during regular business hours, and Globant will provide reasonable prior written notice. During the audit process, Globant will make reasonable efforts to prevent or minimize potential damage, injury or disruption to Supplier's premises, equipment, personnel and business.

V. Reporting concerns

We encourage all of our Suppliers to act proactively by reporting suspected violations of this Code of Conduct.

Suppliers who suspect that any Globant employee, representative, or their own employees or subcontractors providing services to Globant have engaged in illegal or improper behavior or potential violations of the principles outlined in this Code of Conduct are required to report such incidents to Globant promptly. Reports can be submitted through our [Ethics Line Resguarda](#) which allows the option of anonymous reports.

Globant expressly forbids any retaliation or discrimination against individuals who, acting in good faith, report suspected misconduct or violation of any law, rule, regulation or principle outlined in this Code of Conduct. The Suppliers' relationship with Globant will not be affected by an honest report related to misconduct, and Suppliers must refrain from retaliating in any manner against individuals who make such reports in good faith.

If you have questions about our Supplier Code of Conduct, please contact compliance@globant.com.

VI. Violation of this Code

Globant may immediately terminate the engagement with the Supplier in the event of non-compliance with this Code or with applicable laws.