

Code of Ethics

Version 4.00



February 23rd, 2026

Our manifesto

What we stand for, and how we create value

At MindShore, we believe that technology, when well designed and applied responsibly, has the power to transform realities.

But beyond technology, we believe in people. In those who contribute knowledge, commitment and professional judgement. In those who listen before acting. And in those who understand that leadership is service.

That conviction defines the way we work.

We practise open communication.

We stay close to the real challenges of clients and teams.

We listen carefully. We act judiciously.

We respond quickly, without sacrificing quality.

We are guided by a genuine vocation for service: providing solutions that truly help.

We believe in teamwork. Talent grows when it is shared.

We are committed to continuous improvement. The environment changes. So do we.

Being part of MindShore means embracing these principles every day.

Every decision is an opportunity to build relationships based on trust, responsibility and respect.

For us, success is not measured solely by the result. It is also measured by the path we choose to achieve it.





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Objective, scope and adherence



1. Objective

The purpose of the MindShore Code of Ethics is to highlight our values and establish the principles of conduct that should effectively guide the actions of everyone who is part of our company in how we interact with clients, suppliers, and institutions.

2. Scope of Application

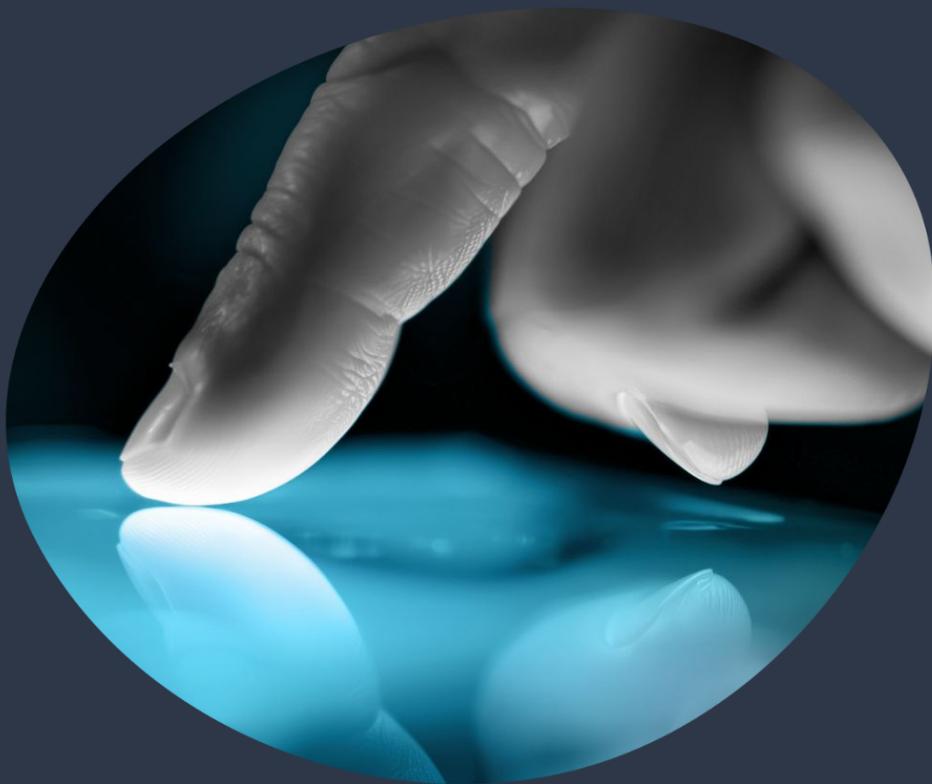
This Code of Ethics applies to all individuals who are part of MindShore: employees and collaborators, executives, external advisors, administrators, and partners. Other individuals and entities with contractual and business relationships with MindShore may also be subject to this Code of Ethics by incorporating clauses of acknowledgment and acceptance into their contracts.

3. Adherence

MindShore adheres to the following agreements and declarations, whose content and spirit will guide MindShore's activities with the same strength as the principles and values explicitly listed in the following section:

- The Universal Declaration of Human Rights, adopted by the UN General Assembly in its Resolution 217a (III), on December 10, 1948, in Paris.
- The Principles of the United Nations Global Compact, an initiative announced at the World Economic Forum in 1999.
- The Sustainable Development Goals (SDGs).





Purpose, Mission, Vision & Values

*It is who we are, the reason for our existence
and our reason for being.*

*Our purpose drives and guides us
and gives meaning to all our activities.*

*At the core of MindShore, we highlight a series of values
that guide us in every interaction, decision, and project.*

*They are the essential pillars upon which our culture
and identity as a company are built.*



1. Purpose, Mission, Vision

Our Purpose

To drive the technological transformation of companies through expert talent, agile methodologies, and future-oriented solutions.

Doing so by combining human intelligence and digital capabilities to solve complex challenges with efficiency, speed, and business vision.

Our Mission

To provide our clients with high-impact technological solutions, developed by flexible, expert, and committed teams capable of integrating as an extension of their own organization.

Our Vision

To be the preferred technology partner for companies seeking efficiency, innovation, and autonomy, leading a new model of IT service delivery based on trust, specialization, and intelligent collaboration.



2. Values

*Our values define how we behave and collaborate.
They are reflected in daily actions, not statements.*

Open communication

We believe effective communication is a key element in interactions and decision-making for success in all our clients' projects.

Therefore, we establish that all necessary information must always and by default be shared with teams, clients, and partners.

Effective resolution

We combine agility and passion in everything we do with the knowledge and experience to consider all alternatives thoughtfully and carefully.

We know how to preserve the right balance between maximizing efficiency and safeguarding a high-quality consulting process.

Service orientation

We strive to fully understand the perspective of internal and external clients, at all times and in its entirety, without excuses or conditions. Thanks to this, we can offer personalized and exceptional quality solutions to our clients while also caring for the interests of our team.

Team spirit

One-Team, at all times and under any circumstance. We believe in and support a collaborative model that deepens team spirit and values the importance of each member in achieving our goals.

On this premise, team members—regardless of geographic location or level of commitment to client challenges—maximize their best results by feeling part of MindShore.

Continuous improvement

Our collaboration model encourages and rewards proposals for improvement from team members regarding our solutions, our environment, and our clients.

We promote a context that stimulates every MindShore member to propose changes with a positive impact and to turn them into individual actions that contribute to the common good.



Principles of Conduct

*MindShore is committed at the highest level
to the following principles,
which form the foundation of this Code of Ethics.*

*These principles will be permanently upheld and will guide
all areas of MindShore's business activity and our way
of acting and presenting ourselves to the world.*



1. Employment development, equality, and non-discrimination

The selection of all MindShore personnel—employees, associated professionals, advisory board members, and partners—will be based on principles of equality, respect for diversity, and social inclusion.

MindShore's collaboration policy will aim at talent management and the commitment of professionals to the MindShore project, promoting the professional development of all employees and collaborators through internal promotion policies, merit recognition, continuous training plans, integration, and work-life balance policies.

MindShore recognizes and promotes non-discrimination based on age, gender, birth, sexual orientation, race, beliefs, religion, or ideology. MindShore also recognizes and respects the right of workers to freedom of union association and the effective exercise of collective bargaining rights through their representatives and unions.

2. Occupational health and safety

MindShore promotes a safe and stable working environment and is committed to permanently updating occupational risk prevention measures appropriate to each position, whether on-site or remote.

All MindShore members are required to strictly observe health, safety, and hygiene regulations, whether established by MindShore or by the companies where MindShore provides its services.

3. Conflicts of interest

At MindShore, all individuals subject to this Code of Ethics must avoid involvement in decisions or actions when there is a conflict between their personal interests and those of MindShore or its clients.

In the event of a potential conflict of interest, they must immediately disclose it and refrain from participating in the affected decisions, always prioritizing integrity, transparency, and the general interest of the organization and its clients.



4. Zero tolerance for corruption

MindShore follows a principle of zero tolerance for corruption and will define policies to regulate the giving and acceptance of gifts, benefits, invitations, etc. These must always be exceptional and conform to social norms and practices to ensure they cannot influence the activities of MindShore or third parties, particularly when involving public officials or equivalents.

5. Confidentiality, information security, and professional secrecy

All individuals at MindShore must maintain confidentiality regarding sensitive data they learn through their professional activity. MindShore is committed to protecting the confidentiality, integrity, and availability of both internal and external information.

Every collaborator must be aware of their responsibility in handling information securely and must follow internal policies and best practices to prevent security breaches. Strict security policies will be adopted, audits carried out, and mechanisms applied to minimize risks such as cyberattacks, data theft, or unauthorized access.

6. Personal data protection

The protection of personal data is a priority. MindShore ensures that client, collaborator, and third-party data are handled with the highest level of confidentiality and in compliance with data protection laws (such as the GDPR in Europe).

MindShore requires compliance with our data protection policies from all collaborators or any recipients of data for which MindShore is responsible.



7. Quality management

At MindShore, we are committed to providing high-quality technological services, aligned with the most demanding industry standards and focused on delivering excellence in every phase of service.

Our goal is to provide real value to our clients through efficient, reliable, and carefully supervised solutions. Continuous improvement will be a permanent approach, using rigorous quality controls and adopting technological innovations that optimize processes and results.

8. Transparency

MindShore will provide truthful and transparent information to authorities, partners, markets where it operates, and clients regarding financial and accounting matters, in compliance with applicable legislation.

9. Commitment to professional relationships and mutual trust

Individuals subject to this Code must act with responsibility, integrity, and respect towards the professional relationships established by MindShore with its clients and collaborators.

They must avoid any actions that could undermine the trust placed in MindShore as a provider of technological services. The strength of our relationships is based on transparency, professionalism, and the will to create long-term value for all parties.

10. Proper use of resources

All MindShore members must make proper, efficient, rational, and legal use of the IT and other resources made available to them.

MindShore will promote environmental preservation and respect, as well as compliance with environmental protection principles.





Dissemination, non-compliance & revision log



1. Training and Dissemination

This Code of Ethics and the regulations that develop it are included among the mandatory training subjects for all MindShore members. They will be accessible on the MindShore website and shared directories and must be ratified by all those who wish to be professionally linked to MindShore.

2. Reporting

All MindShore members are required to report any act that may constitute a breach of the Code of Ethics or its implementing regulations through the Ethics Channel established for this purpose: canal.etico@mindshore.io

All reports will be treated confidentially, and no retaliation or negative consequences will occur against the reporting party, unless the internal investigation determines that the report was false and made in bad faith.

This Ethics Channel is also available to clients, suppliers, or third parties who become aware of a reportable matter within MindShore.

3. Consequences of non-compliance

Breaches of this Code of Ethics and related regulations may result in the application of sanctions, including disciplinary dismissal, in accordance with labor law and applicable collective agreements, or the termination of business relationships, as the case may be.



4. Approval and revisions

This text is a translation of the original MindShore Code of Ethics, version 4.00 dated February 23rd, 2026, approved by the Company's General Management.

If there are differences or errors in the translation, the Spanish version will prevail.

Revision Log

Version	Detail of Revisions	Update date
0.01	Draft for review and approval	-
1.00	Error correction. First official version. Ordered publication on MindShore's website and maximum dissemination	12.15.22
2.00	References added to our commitment to quality, personal data protection, and information security. The principle on money laundering prevention was removed as it is not a specific risk for our company and is covered under compliance with the law.	09.30.24
3.00	Our manifesto, purpose, mission, and vision of MindShore were included. Values and principles were distinguished. Principles were consolidated and simplified.	09.09.25
4.00	The manifesto is slightly corrected, and the chapters on purpose, mission, and vision are grouped together with the chapter on values. The format is adapted to MindShore's new brand visual identity.	02.23.26





Contact

-  mindshore.io
-  info@mindshore.io & canal.etico@mindshore.io
-  MindShore

