

Globant >

CODE OF ETHICS

#Transparency #MyCause



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The Right Way at Globant

The following Code of Ethics (“Code”), adopted by the Board of Directors of Globant S.A. explains how our values are infused throughout our work. Our Code provides a shared understanding not just about what we do, but

also how we do it, and it serves as a declaration of Globant’s commitment to establish and maintain the highest standards of honesty, integrity and ethical conduct.

Our Core Values

Our Code reflects and is organized around the following key principles:

- 1 Commitment to Ourselves** – to act with integrity in all Globant’s business;
- 2 Commitment to Each Other** – to treat one another with respect;
- 3 Commitment to Globant** – to achieve business successes through honest, fair, and lawful business practices;
- 4 Globant’s Commitment to Us** – to treat Globers with dignity and fairness, to provide a safe work environment, free of harassment and discrimination; and
- 5 Our Commitment Regarding Business Partners** – to conduct business in an honest, responsible, and transparent manner with reputable business partners.

Section 1: Commitment to Ourselves

As part of a global business team, we must commit ourselves to upholding the Company's core value of integrity, including complying with the laws of the countries in which Globant operates. We make this commitment to ourselves not just because it's the right thing to

do, but also because it's an integral part of our commitment to excellence and exceeding client expectations, as well as our dedication to being a good corporate citizen and improving our communities.

Our Standards

Our Code applies to all employees, officers, and members of the Board of Directors of Globant and its direct and indirect subsidiaries, and other businesses controlled by Globant worldwide. Such entities are collectively referred to herein as "Globant" or the "Company" and such

persons to whom our Code applies are referred to as "Globers" or "you". For purposes hereof, the term "Globers" also refers to our contractors, subcontractors, suppliers and others who assist us in servicing our clients or otherwise conducting our business.

Our Responsibility

As a Globber, you share the privilege and responsibility of upholding Globant's reputation. You do this each time you act ethically and legally.

To that end, the Company is committed to providing you with the tools and resources needed to meet all compliance requirements, including compliance training courses and the means to report any conduct that violates our Code, other Company policies or the law.

You are responsible for maintaining a standard of excellence at Globant. For those of you in leadership positions, you have a duty to foster

ethics and integrity amongst your teams. Leaders are expected to help Globers resolve ethical issues and create an atmosphere where each Globber feels comfortable coming to you to ask questions or discuss possible violations.

If you are unclear about which policies or standards apply to you, or how to comply with them, it is your responsibility to seek guidance; consult with your trusted supervisor or Leader, a representative from the HR Department (herein referred to as "People Department"), or contact any member of the Compliance Department.

Our Commitment to Compliance

Globant seeks to conduct its business in compliance with both the letter and the spirit of applicable laws, rules, and regulations. As such, you are expected to have a sound understanding of proper and improper courses of conduct both with regard to our activities and those with whom we interact.

You are expected to be familiar with the laws and regulations applicable to our business activities, and you shall never engage—or direct another to engage—in any unlawful activity while performing your day-to-day business activities.

You will receive a digital copy of our Code, the compliance of which is mandatory for all our Globers. Upon receipt of the Code, you must review it and acknowledge that you have read and understood it. A copy of our Code, which may be periodically amended and updated, can be found at www.globant.com.

Globant will take reasonable steps to (i) monitor and test compliance with our Code, (ii) when appropriate, impose and enforce appropriate disciplinary measures for actions against our Code, and (iii) support you in understanding and abiding by the Code.

Seeking Guidance and Reporting Concerns

You are encouraged to act proactively by asking questions, seeking guidance, and reporting suspected violations of our Code and other policies and procedures, as well as any violation or suspected violation of applicable law, rule or regulation arising while conducting Globant's business or affecting Globant's property.

If you reasonably and in good faith believe that a Globber or anyone else doing work on behalf of Globant has violated or may violate a law or policy, you have a responsibility to report that information immediately to your trusted supervisor or Leader, a representative from the People Department, a member of the Compliance Department, or through the Ethics Line. In short, when in doubt, raise your hand. See Section 6 for the Ethics Line contact details.

Although reports to the Ethics Line may be made anonymously (where allowed by local law), you are encouraged to identify yourself when

making a report so that additional information can be obtained if needed. Whenever possible and permitted by law, your identity will be kept strictly confidential.

Globant has open door, anti-retaliation, and confidentiality policies to help protect Globers who report suspected misconduct (see Section 2). Please do not use reporting channels in bad faith, in a false or frivolous manner, or to report grievances that do not involve our Code or other ethics-related issues.

Globant treats reports of alleged misconduct seriously. All reports are reviewed by the Compliance Department and investigated, if appropriate (see Section 4 below).

You are expected to cooperate fully with any internal investigation into any actual or potential compliance violation.

Section 2: Commitment to Each Other

To be successful, we must fully commit to each other. Commitment to each other means encouraging fellow Globers to engage in meaningful discussion, to ask questions, to raise compliance or ethical concerns, and to do

so without fear of retaliation. Our commitment to each other also means that we will treat each other with respect and will not harass or discriminate against any of our coworkers.

Open Door Policy

You are expected to discuss questions, ideas or concerns without fear of reprisal. The foundation of our compliance program is based on openness, accessibility and discussion within the Globant community.

The Open-Door Policy encourages you to present ideas, ask questions, and raise concerns – especially those of a legal or ethical nature–, but also those relating to the working environment.

All Leaders are responsible for supporting this policy by maintaining an “open door” for

colleagues who may reach out to them. While we hope that you feel comfortable discussing any matter with your Leader, you may rely on alternative avenues, including:

- your supervisor or any Leader that you trust,
- a representative from the People Department,
- a member of the Compliance Department, and
- the Ethics Line.

Anti-Retaliation Policy

It takes courage to raise concerns about actions that may violate or be inconsistent with our Code, Company policies or the law. As such, Globant strictly prohibits retaliation against any colleague who seeks advice in good faith, raises a concern, reports misconduct or provides information.

Prohibited acts of retaliation include, among others, intentionally filing a false report in connection with an employment review, denial of benefits, termination, demotion, suspension,

threats, harassment, discrimination, or any other negative act against an individual. Any Globber who participates in or allows any such retaliatory behavior is subject to disciplinary measures, including termination of employment.

If you believe that you or another Globber has been retaliated against, you should promptly report it to your trusted supervisor or Leader, a representative from the People Department, a member of the Compliance Department or the Ethics Line.

Anti-Harassment and Anti-Discrimination Policies

Globant is committed to providing an inclusive work environment where respect is practiced, diversity is valued, and all Globers and clients enjoy freedom from discrimination, intimidation and harassment. To foster this type of environment, we must treat others with fairness and respect and value each other's individual contributions, regardless of whether we are at a location where we conduct our business (such as a Globant office or a client site) or at any other locations where we congregate for a work-related activity or event (such as a restaurant, hotel or conference center).

You shall never create or allow others to create an intimidating, hostile, or offensive working environment, or unreasonably interfere with other Globber's ability to work.

As such, Globant strictly prohibits any inappropriate or discriminatory comments, jokes, or actions regarding race, color, ethnicity, creed, ancestry, religion, sexual orientation, age, gender identity or gender expression, national origin, marital status, pregnancy, childbirth or related medical condition, genetic information, military service, medical condition (as defined by state or local law), the presence of a mental or physical disability, veteran status or other characteristics protected by law.

Globant also strictly prohibits any discrimination on the basis of a legally protected characteristic when making employment decisions, including but not limited to recruiting, hiring, training, promotion, termination or granting of benefits.

Section 3: Our Commitment to Globant

You should commit to Globant's success through honest, fair and lawful business practices

that reflect the integrity, trustworthiness and independence of each individual Globber.

Conflicts of Interest

While Globant does not wish to interfere in personal affairs, you are responsible for avoiding situations that present—or create the appearance of—a conflict between your interests and those of Globant.

A conflict of interest arises when your personal, social, financial or political interests interfere with the interests of the Company. Even the

appearance of a conflict can damage your reputation or that of the Company. Conflict of interest situations can be complex, but they can many times be resolved through good judgment and consulting the proper resources. Thus, although not every real or perceived conflict will violate our Code, to protect ourselves you must disclose any such concern to the Compliance Department so it can be properly reviewed and

resolved. Compliance must escalate potential conflicts involving senior management to the Audit Committee for resolution.

It is not possible to list every situation that may lead to either a real or apparent conflict of interest. However, this section includes specific rules, guiding principles and illustrative examples that may result in a conflict of interest or an apparent conflict of interest. By understanding the types of conflicts that exist, avoiding situations that are most likely to result in conflicts and disclosing actual or potential conflicts, we can ensure that our decisions are made in a fair and unbiased manner.

Outside Business and Other Interests

You are expected to diligently perform and devote your best efforts to your assigned duties and to furthering Globant's interests. To remain objective and ethical, you must never pursue opportunities that compete with Globant.

You must refrain from activities, investments, actions or associations that compete with Globant, interfere with one's judgment concerning Globant's best interests when conducting Globant's business or exploit one's position with Globant for personal gain.

This same principle extends to your personal relationships outside of Globant. You are not permitted to help anyone else, including family members and friends, take personal advantage of an opportunity to compete with Globant. Because it is not always easy to determine whether outside employment could be to the detriment of Globant, before accepting any offer of outside employment, full time employees must receive pre-approval of such outside employment from the Compliance Department. You may suggest to Globant the procuring of a company as supplier, vendor, contractor,

agent or representative even if you own, work for, manage, provide services to or otherwise cooperate with that company, or if you have a close personal relationship with someone who works for, or has an interest in, that company.

However, in any such cases you are not allowed to influence any decision in favor of such company. Transactions between Globant and any third party should be kept at arm's length. Globant also encourages you to be active participants in our community. However, outside activities—including volunteer work or otherwise donating your time and skills— may interfere with the interests of Globant. For this reason, you should be particularly cautious if you are creating intellectual property that may be assigned to an outside party, making sure that in doing so you first fulfill all of your obligations vis-à-vis Globant.

Please refer to the **Related Party Transaction Policy** for more information. When in doubt, consult a member of the Compliance Department.

Personal Relationships

At times you may find yourselves working with family members or others with whom you have close personal ties. While this does not always create a conflictive situation, it can lead to favoritism or its appearance. Always take care that such ties do not influence your work responsibilities or your capacity to make right, unbiased, and objective decisions.

For this reason, you may not directly or indirectly supervise, review or influence the job evaluation, performance, or compensation of another Globber with whom you have a close personal relationship, including family members, friends, a domestic partner or a significant other. You must inform your supervisor of any

close personal relationships within Globant or any (actual or potential) business partner or competitor, if he, she or they hold a position of influence which could affect Globant.

Financial Investments & Other Arrangements

Another important type of conflict involves our personal finances. To maintain our high standards of integrity, neither you nor your close personal relationships must hold a substantial financial interest in a customer, supplier, or competitor of our Company.

Substantial financial interest means, for purposes of this Code, holding greater than 1%

of the outstanding equity interests of a publicly held company, or greater than 5% of those of a privately held company.

If you or a family member (or other close personal relation) holds a significant financial interest in any customer, supplier, or competitor of Globant, you should disclose the situation immediately to the Compliance Department.

Relatedly, you should be particularly careful about entering into transactions with Globant's directors, officers, and significant shareholders, since such relationships can increase the risk of real or perceived conflicts of interest.

Protection and Proper Use of Globant's Technology

Our computer networks, computers, other devices, and the software used at Globant are Company-provided technologies and important assets. They should not be misused, used for your personal benefit or used for any personal purpose other than work. Additionally, you should not use your personal email or personal devices for Company-related business. If left unsecured, these items can pose a substantial risk to our confidential information. We must always protect Globant information systems from unauthorized access or modification.

Further, you must ensure that all use of Globant and client equipment, as well as information systems, conforms to Globant's Acceptable Use

Policy. When you access client information systems, you should familiarize yourself with additional contractual obligations that may apply.

When sending business communications in your capacity as a Globber, you must maintain a professional tone and discuss only appropriate subjects. All emails sent and received through Globant networks or using Globant resources must comply with our Code.

Globant assets, like equipment, information systems and the messages communicated within them, are the sole property of Globant, and where permitted, the Company reserves the right to monitor, audit and inspect your use of these resources.

Protection and Proper Use of Globant's Knowledge

You are relied upon to protect important information from unlawful or inadvertent disclosure. Safeguarding it is critical to our ability to obtain and retain customers. Therefore, you must always take appropriate precautions to ensure that sensitive business information is only communicated confidentially, and only to Globers on a business need-to-know basis. Never provide confidential information to a third party without the appropriate approvals and non-disclosure agreements in place.

Your obligation to protect information also extends to our intellectual property because it has commercial value and is crucial for us to successfully compete in the marketplace. Any intellectual property you generate in your work belongs to our Company or to our clients, including business-related written works, technological advances or unique solutions to business problems. Whenever you create intellectual property, you must ensure it is disclosed to the Company and protected in accordance with all applicable policies and contractual obligations.

You should be guided by the general principle that Globant considers confidential any information that is not officially disclosed or publicly known and which might be useful to or desired by others for any reason, such as using the information to compete against Globant. It is impossible to list all of the types of Globant information that must be treated as confidential. The following are some examples of confidential information to assist you in observing this important policy:

- Information about contractual arrangements between Globant and its suppliers, contractors, advertising providers or customers that has not been publicly disclosed by management;
- Information about other Globant transactions, including proposed transactions, such as acquisitions or dispositions of equity interests or other assets, which has not been publicly disclosed by management;
- Financial, accounting and cost information about Globant that has not been publicly disclosed by management;
- Information that reveals Globant's plans and strategies that have not been publicly disclosed by management;
- Information related to contractual relationships with customers, including terms and pricing information; and
- Personnel information such as salaries, bonuses, and other sensitive personal information.

This non-disclosure obligation applies to you not only during your period of employment or service with Globant, but also after termination of employment or service, or upon retirement. If you have any questions regarding whether information you originate or acquire is confidential you have a responsibility to determine its classification by asking your immediate supervisor or a member

of the Compliance Department.

You should also seek guidance from the Compliance Department if you suspect intellectual property of the Company or a client has been infringed upon or otherwise misused, or if you have any questions on the use or appropriate protection of intellectual property.

Protection and Proper Use of Globant Assets and Records

It is critical to our success and performance as a Company for you to protect Globant assets and ensure their appropriate and efficient use. When you use these resources efficiently and appropriately, you create value for yourself and our customers. Theft, carelessness, abuse, and waste adversely impact Globant.

Such assets include monetary and physical property like equipment, supplies, facilities and cash, but also include intangible assets like confidential information and intellectual property, and information systems we use to conduct Globant business.

Intellectual property in this Code refers to our tools, methodologies, creative ideas, expressions and their associated commercial value, including but not limited to system code or designs, proprietary computer systems, copyrights and trademarks.

Use of Globant Funds

You are also personally accountable for Globant funds over which you have control. Anyone spending Globant's money or personal

money that will be reimbursed should always be sure Globant receives good value in return. Accordingly, anyone approving or certifying the correctness of an expense report should have reasonable knowledge that the purchases and amounts are proper and legitimate.

Any and all expenses paid or payable on behalf of Globant should be reasonable and be made on a bona fide basis for business purposes only.

Record Retention Obligations and Return of Documents

Just as we maintain our financial and business records in accordance with relevant policies, rules and regulations, we must also retain and dispose of those records lawfully and ethically. This means you must always follow the document retention guidelines that apply to our locations and projects. You must never destroy records unless doing so is compliant with any applicable document retention schedule requirements and/or any legal hold or destroy notices. Destroying or disposing of documents without such confirmation could violate specifications in our client contracts or

other legal obligations. If you have questions regarding the status of any records in your possession, consult your trusted supervisor or Leader, or a member of the Compliance Department before taking further action. Please bear in mind that all Globant documents, records, memoranda and other written materials (and all copies) are solely Globant's property and must be returned immediately to Globant upon termination of employment or service.

Obligations to Former Employer

You are expected to abide by any legal obligations you may have to your former employers. These obligations may include restrictions on the use and disclosure of confidential information, soliciting former colleagues to work at Globant and non-compete obligations. Should you have any questions about your obligations towards your former employer please check with a member of the Compliance Department.

Complete and Accurate Recordkeeping

Our reputation is built on the confidence of others. This is, in part, based on the accuracy of the written records and verbal statements we produce. By providing full, fair, accurate, timely and understandable disclosures, we generate trust with our stockholders and the public. We also meet important legal and regulatory obligations, including by filing items with or submitting them to the regulatory authorities. Failing to accurately record financial information and public reports severely damages our name, exposes us to legal liability, and harms our reputation.

Globant shall prepare and maintain its accounts fairly and accurately in accordance with the accounting and financial reporting standards that represent the generally accepted guidelines, principles, standards, laws and regulations of the country in which Globant conducts its business affairs. You are responsible for upholding all internal controls and for the accuracy of the books, records and accounts you maintain in the course of your work, including:

- Financial records
- Timesheets
- Travel and expense reports
- Forecasts, resource allocations and billings
- Financial statements

In this regard, you must never:

- Establish any undisclosed or unrecorded account or fund for any purpose;
- Make false or misleading entries in the Company's books or records (including false entries to any timesheets or expense reports) for any reason;
- Circumvent any internal controls;
- Make a written commitment on behalf of Globant that exceeds your individual authority;
- Disburse corporate funds or other corporate property without adequate supporting documentation and authority to do so;
- Make information inaccessible to auditors and other authorized parties and government agencies; or
- Enter into any kind of side agreements with third parties to circumvent internal controls or outside of the standard contractual terms without approval.

Protection of Globant's Image and Proper Use of Social Media

While you are encouraged to participate in social media, you should be thoughtful in all of your communications and dealings with others. We must all take care to safeguard our Company's hard-earned assets and reputation.

As such, you must never threaten, libel, harass or defame fellow Globers, clients, competitors or anyone else, or make any inaccurate or misleading representations relating to Globant.

You must also not speak on behalf of Globant, our competitors or our industry with any

member of the media or investment community (including all "market professionals" such as securities analysts, institutional investors, investment advisors, brokers, dealers and security holders) unless you are authorized by Globant to do so.

If you are approached by any media person, analyst or investor to speak on behalf of our Company, our competitors or our industry, please direct those queries to the Compliance Department. Do not attempt to provide any information yourself.

Insider Trading

Our success in the marketplace depends on the trust and confidence of the investment community and our business partners. Earning this trust requires us to act with integrity when trading public securities and to follow all securities laws that apply to us and our business. In order to uphold our commitments to our stakeholders, we never participate in insider trading.

Through your work at Globant, some of you may learn about material, nonpublic (or "inside") information, potentially relating to our Company as well as other companies with which we work.

Trading securities based on inside information is illegal and is strictly prohibited. If anyone uses inside information to effect transactions, for themselves or others, before the public has been offered knowledge of this information, the consequences may include civil and criminal penalties for our Company and the individuals involved.

Please refer to **Globant's Insider Trading Policy** for more information.

Third Party Audits & Government Investigations

Another area in which we must demonstrate our integrity and trustworthiness occurs in those times when the Company may undergo a third-party audit or government investigation. These events could include engaging with an independent auditor undertaking an audit, review or examination of the Company's financial statements, or participating in the preparation or filing of any document or report with a government agency such as the US SEC.

When interacting with these individuals and entities, you must not knowingly make or cause others

to make a false or misleading statement. Similarly, you may not mislead an auditor by omitting any fact that is needed for them to develop an accurate picture of our Company's financial position.

Finally, never directly or indirectly take any action to coerce, manipulate, mislead, or fraudulently influence anyone engaged in the performance of an audit or review of Globant's financial statements. Contact the Compliance Department immediately if you are approached for a third-party audit or in connection with any investigation conducted by a governmental agency.

Political Activity

While Globant encourages you to participate in electoral politics in those countries where appropriate, such activity must occur strictly in an individual and private capacity and not on behalf of the Company. You may not conduct

personal political activity on Company time or use Company property or equipment for this purpose unless appropriate approvals have been obtained. Please contact the Compliance Department for additional information.

Section 4: Globant's Commitment to Us

Globant believes in being a responsible corporate citizen that places high value on respect for individuals and sustainability. Globant commits to treat you with dignity and fairness, to provide

a safe work environment free of harassment and discrimination, to protect your right to privacy to the greatest extent possible and to promote lawful, ethical conduct.

Labor and Environmental Practices

We uphold human rights in all of our global operations, in line with the United Nations Global Compact and the principles set out by the International Labor Organization. Globers are entitled to fair wages and hours, consistent with local laws, and to work in an environment free from discrimination.

Globant also does not make use of child labor (i.e., a person under the minimum age provisions of applicable laws and regulations) or forced

labor (i.e., prison labor, indentured labor, bonded labor, military labor, slave labor), does not condone any form of human trafficking and will not work with third parties who do so.

Globant also supports a precautionary approach to environmental challenges; undertakes initiatives to promote greater environmental responsibility and encourages the development and diffusion of environmentally friendly technologies.

Equal Opportunity Employer

Diversity is a tremendous asset, and Globant recognizes that a diverse work force provides many benefits, including creativity, variety in problem-solving methods and the capacity to work effectively as a global company.

As such, Globant is firmly committed to providing equal employment opportunities to qualified applicants without regard to personal characteristics, such as race, color, ethnicity, creed, ancestry, religion, sex, sexual orientation, age, gender identity or gender

expression, national origin, marital status, pregnancy, childbirth or related medical condition, genetic information, military service, medical condition (as defined by state or local law), the presence of a mental or physical disability, veteran status or other characteristics protected by applicable laws.

Globant policies and practices shall be administered in a manner ensuring that equal opportunity is afforded to those eligible and decisions be merit-based.

Health and Safety in the Workplace

Globant is committed to providing a safe, healthy workplace where all of us can thrive. In pursuit of this critical goal, you must comply with all health and safety policies applicable to our jobs, as well as with health and safety

laws or regulations in the countries where we do business.

You are expected to use Globant equipment and materials in a safe way and promptly report

any potential health and safety issues to a representative from the People Department. You are also expected to conduct all business activities with the necessary permits, approvals and controls. Doing so helps us maintain our own safety, as well as the safety of our fellow Globers.

As part of our commitment to maintaining a safe working environment, you must never react with violence, threats of violence, abuse or retaliation. This includes implicit or explicit verbal threats, intimidation, bullying or any physical act of violence. Under no circumstances should anyone bring a weapon to work.

Just as you must not introduce violence into our workplace, you may not work under the influence of drugs or alcohol. The fabrication, use, transportation, sale, purchase or possession of illegal drugs or other unauthorized substance, as well as the abuse, sale, or purchase of alcohol or doctor-prescribed drugs while on Company property or while conducting Company business is strictly prohibited. Such behavior puts Globers and our clients at risk. You should also talk to a representative from the People Department if you notice another Globber's performance on the job is impaired due to the use of alcohol, illegal substances or drugs, or that another Globber is using illegal substances on Company or client property.

Privacy of Personal Information

Preserving the privacy of personal information is critical. Personal information is information that can directly or indirectly identify an individual, such as name, contact information and health-related information.

Globant, its business partners and its agents are accountable for protecting personal information and for processing it only within the boundaries of applicable law, and Globant policies and procedures.

Globant shall endeavor to protect the privacy of personal information by:

- Keeping client information confidential;
- Complying with applicable laws and regulations of the jurisdictions in which personal information is collected and used;
- Sharing personal information only with individuals who have a legitimate need for it and will protect it properly; and
- Properly handling and destroying documents and records containing personal information.

Response to Reports of Misconduct Against our Code

If you believe or suspect that a Globber or vendor may be engaging in conduct that could violate this Code, our policies or the law, you are expected to report your concerns to your Leader or any Leader that you trust, a representative from the People Department, a member of the Compliance Department or the Ethics Line.

All reports will be reviewed by a member of the Compliance Department, who will, as appropriate, investigate the complaint. This may include the collection of emails, financial records and other information, as well as conducting interviews with the people involved.

Globant endeavors to promptly conclude investigations and any related remediation as expeditiously as possible.

Based on the gravity of the misconduct, disciplinary measures may consist of:

- Verbal warnings;
- Written reprimands;
- Mandatory training or coaching;
- Temporary suspensions (with or without pay); and/or
- Termination of employment.

A particular incident of misconduct may not be the object of more than one disciplinary measure. Repeated impositions of disciplinary measures to an individual may be considered as cause for termination of employment.

The Audit Committee, in consultation with the Corporate Governance and Nominating Committee as the ultimate authority to decide on matters relating to the receipt, investigation, treatment and resolution of complaints received by the Company regarding violations of this Code, may, depending on the subject matter, the gravity and quantity of the relevant complaints, delegate or assign, in agreement with one or more other Committees of the Board, the investigation, treatment and/or resolution of complaints received, to such other one or more Committees of the Board or to a member of the management of the Company, as applicable. In addition, the Audit Committee may also recommend to any such other Committees of the Board or to the full Board, the implementation of new policies or the revision of existing ones to address issues raised in connection with violations of this Code.

Section 5: Our Commitment Regarding Business Partners

Globant is committed to conducting business in an honest, responsible and transparent manner, and with reputable business partners. You should interact with clients and business

partners with the utmost professionalism and courtesy, and shall, in no circumstance, disrespect a client or business partner or act impolitely, insultingly, defamatory or obscenely.

Ethical Sales and Marketing Practices

Globant is committed to dealing honestly, ethically, and fairly with all of our suppliers, customers, competitors, recruitment candidates, government officials and Globers. We never take unfair advantage of others through manipulation, concealment, abuse of confidential information, misrepresentation of material facts, bribery or any other unfair dealing practice.

As part of this commitment, you must make sure that your communication of information about our services is truthful, complete, and accurate. Promotional materials and other statements you distribute regarding the Company's services must be true and never misleading, deceptive or fraudulent.

Anti-Bribery and Anti-Corruption

You are prohibited from offering, giving, requesting, accepting or receiving a bribe.

You may never offer, authorize or provide a payment or benefit that is intended to improperly influence—or even appears to improperly influence— anyone, whether affiliated with the government or private sector or to gain any unfair business advantage.

Please refer to **Globant's Anti-Bribery and Anti-Corruption Policy** for more information.

Gifts and Entertainment

The occasional exchange of gifts and business courtesies, such as reasonable entertainment and modest gifts, may facilitate the development of trust between Globant and its business partners (or potential business partners).

● A **Gift** is any item of value given to a third party on Globant's behalf or received by a Globber. Gifts usually include goods and services, but can be anything of value,

including meals, travel or lodging expenses that are not associated with attendance at a business meeting or event, tickets to events, discounts or credits, employment offers, charitable contributions, investment opportunities, honoraria and even items with the Globant logo (such as coffee mugs).

● **Entertainment** refers to anything of value given to a Globber or by Globers, in the context of a business relationship between a Globber and a third party, where the person offering and the person accepting both attends. Common forms of entertainment include dinners, concerts, sport events and outings not connected with attendance at a business meeting or event.

However, you must avoid giving or receiving Gifts or Entertainment that influence, are intended to influence or appear to influence any decision that affects Globant or our business partners except in accordance with appropriate business practices, our Code and our Anti-Bribery and Anti-Corruption Policy. Any Gift that is accepted or given by a Globber must not exceed the value of US\$ 300. Gifts and Entertainment received from or given to government officials or government entities are strictly prohibited.

Inviting clients or potential clients to Globant sponsored events must never be done in order to obtain an improper business advantage. You must be especially careful when inviting clients or potential clients to marketing events while there is an ongoing contract negotiation or tender with that client, since this may create the appearance of impropriety.

If you have any questions or are unsure about whether a Gift or Entertainment is appropriate, please consult a member of the Compliance Department.

Fair and Honest Competition

Globant believes that the best way to outperform our competition is by fairly and honestly seeking competitive advantages through superior performance, never through unethical or illegal business practices. This means, in part, that we never unfairly disparage our competitors, their products or their services.

Antitrust and competition laws protect free enterprise. While these laws are complex and difficult to summarize, at a minimum they prohibit agreements between Globant and our competitors that affect prices, terms or conditions of sale or fair competition.

You are responsible for being aware of these laws and their implications, including how they

apply in the countries in which we operate. You must seek advice from the Compliance Department before engaging in any activity that might violate these laws.

In our competitive business environment, we often seek to acquire information about our competitors and their products and services. To compete fairly in the marketplace, we must show the same respect for the confidential information of our competitors that we show for our own. This means you may only gather competitive information in a lawful and ethical manner, never through deception, theft, bribery or misrepresentation. Similarly, you may not retain or use a third party to do what we ourselves cannot.

Anti-Money Laundering

As part of our commitment to ethical business practices, we must understand how to spot suspicious activities, including money laundering, which is strictly prohibited.

Money laundering refers to the process by which certain individuals or groups attempt to conceal illicit funds or make the sources of such funds appear legitimate.

- **Illicit funds** mean money obtained through illegal or improper activities.

To combat money laundering, Globant performs risk-based due diligence on third-party customers, suppliers, and other business partners to ensure that those with whom we do business are engaged in a legitimate business. We must ensure that Globant does not participate in any transactions with counterparties involving illicit funds.

If you suspect that a counterparty or business party is engaged in illegal activity or transacting with Globant using illicit funds, or if you have any other questions or concerns about potential money laundering, please consult the Compliance Department for guidance.

Global Trade Controls

As a global company, Globant transfers goods, services and technologies across national borders. Our business operations and products touch countries all around the world, and we are subject to laws and regulations in a number of different jurisdictions.

We are all responsible for complying with trade control laws, which are complex and may change quickly as governments adjust to new political and security issues. Violations of

global trade control laws can lead to significant fines and penalties, for both Globant and any individuals involved, as well as other business and supply chain issues.

The Company complies with these laws and any activity in violation of these laws is contrary to our Code and Company policies. If you have any questions about international trade issues, please direct them to the Compliance Department.

Section 6: Reporting Complaints, Exceptions, and Amendments

Our commitment to ethical business practices depends on the commitment of each and every Globber throughout the organization.

Reporting Concerns

If you suspect that a Globber engaged in behavior that may violate our Code, you should promptly report the behavior to your Leader, a representative from the People Department, a member of the Compliance Department or the Ethics Line.

To make a report by telephone, dial the number specific to your country and follow the prompts:

- Argentina: 0800-999-4636
- Brazil: 0800-891-4636
- Canada: 1-888-640-6497
- Chile: 800-835-133
- Colombia: 01-800-752-2222

- Costa Rica: 0 800 054 1046
- France: www.resguarda.com/globant-ethics.globant@resguarda.com
- Germany: www.resguarda.com/globant-ethics.globant@resguarda.com
- Mexico: 01-800-1233312
- Peru: 0800-00932
- Spain: 900-975-278
- USA/UK/India: 1-800-921-2240
- Uruguay: 000-4052-10128

Reporters may also submit a report (Report of Action Against the Code of Ethics, or "RAC") directly on www.Resguarda.com, or by email to ethics.globant@resguarda.com.

Exceptions to Code Provisions

While our Code must be strictly adhered to by all Globers, there may be special circumstances where an exception could be appropriate. If you believe an exception to any of these policies is appropriate, you should contact our Compliance Department, which maintain a record of all exception requests and the relevant resolutions. All exceptions authorized must be reported to

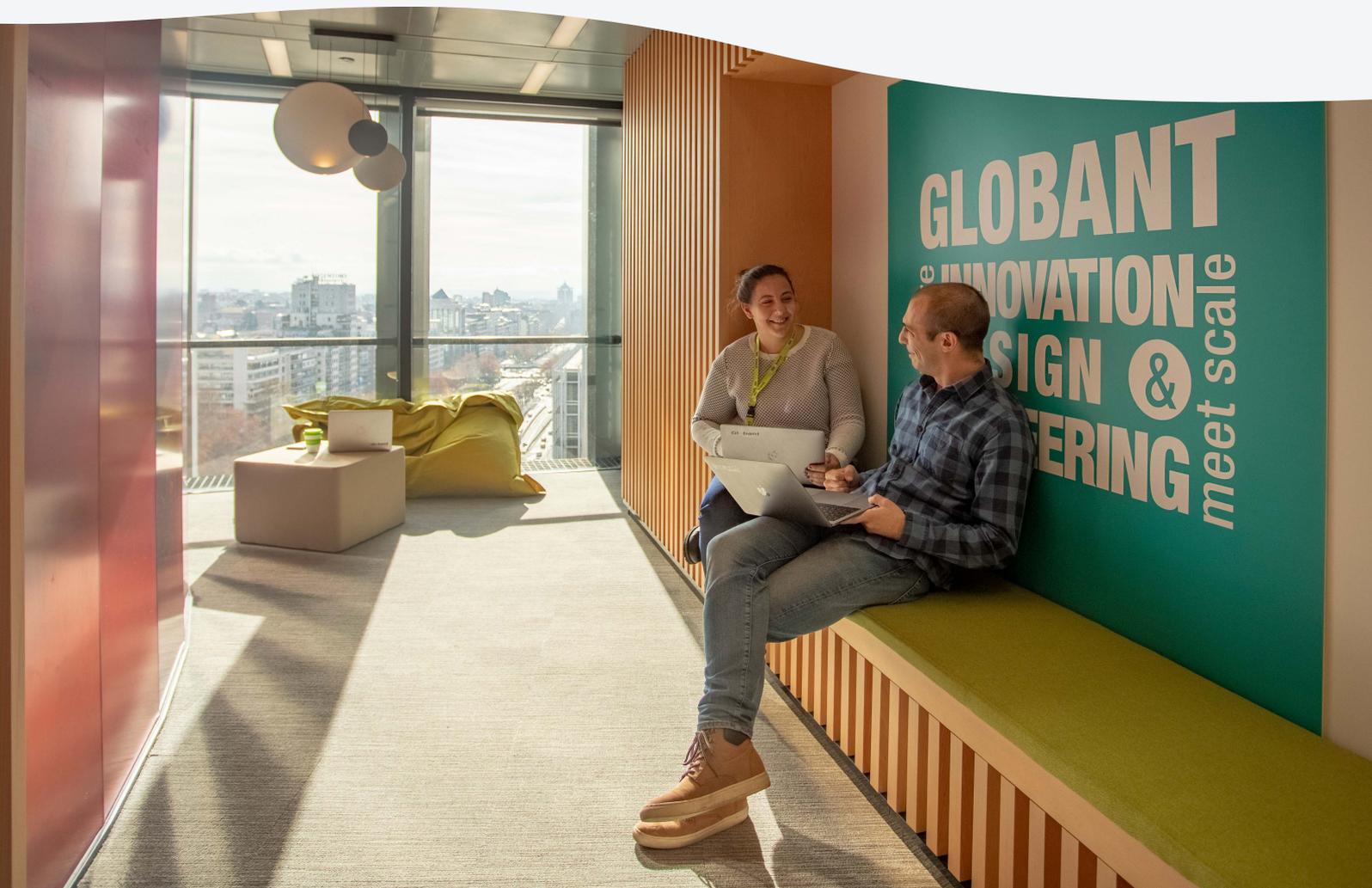
Company's Audit Committee. In any case, no exceptions that may entail a violation of laws or regulations of any kind shall be granted.

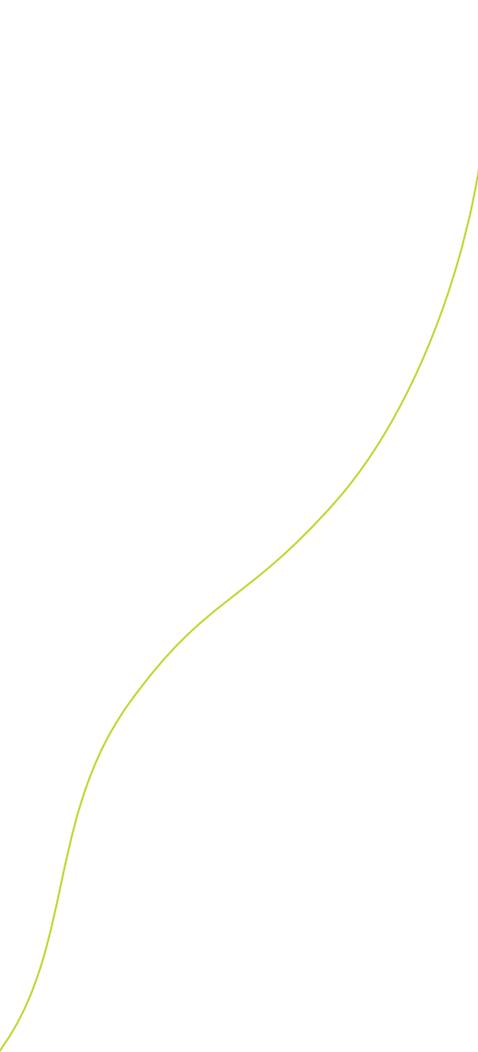
Any exceptions involving an Executive Officer or a Board Member must be approved by the Board of Directors and, if applicable, will be publicly disclosed as required by law or regulation.

Amendments to Code

All material amendments to the Code must be approved by the Board of Directors. The General Counsel may, nonetheless, authorize specific amendments or appendices to adapt

the provisions of this Code to local regulations in effect in those jurisdictions in which we may operate, to the extent necessary.





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