Globant Modern Slavery Statement 2018

In Globant we are dedicated to making the world a better place, one step at a time. As part of this mission, we are committed to ensuring decent and free working conditions for our employees (our "Globers"), responsible management of natural resources and our impact on the environment, and an honest and ethical way of operating the business.

This statement, covering our 2018 financial year, is being issued persuant to the UK Modern Slavery Act from Sistemas UK LTD and We Are London LTD, the primary subsidiaries of Globant for the United Kingdom. In order to account for our efforts to mitigate all types of modern slavery in our business or supply chain. In this statement we understand that "modern slavery" includes forced labour, human trafficking, child and domestic slavery.

1. Company purpose

In Globant, we thrive by transforming organizations to be ready for a digital and cognitive future, providing world-class opportunities for talent around the globe.

We are a digitally native company where innovation, design and engineering meet scale. We use the latest technologies in the digital and cognitive field to transform organizations in every aspect.

2. Business and supply chain

Globant is a disruptor in the professional services arena. We leverage the latest technologies and methodologies in the digital and cognitive space to help organizations transform in every aspect. We create software products that emotionally connect our customers with millions of consumers and employees, and we work with them to improve their efficiency.

To deliver solutions for the digital and cognitive transformation a completely different approach is needed, compared to traditional IT projects. It all starts by cultural, behavioral and organizational change and then delivering the right blend of engineering, design and innovation.

We differentiate from other players due to the fact that we are a pure play in the digital and cognitive fields.

We do not have suppliers that are material to our business, except for the purchase of equipment or licenses, which we do with top companies. Additionally, as part of our Purchase Policy, all of our agreements with suppliers include written representations with respect to compliance with applicable law, including, in particular, applicable labor law.



We ended the year 2018 with 8,384 professionals, of which 7,821 were IT professionals.

3. Policies addressing ethical conduct

In our Code of Ethics we establish our compliance with Laws, Rules, and Regulations.

In Globant we seek to conduct our business in compliance with both the letter and the spirit of applicable laws, rules, and regulations. We expect all of our Globers to have a sound knowledge of the proper and improper courses of conduct both with regard to their own activities and those with whom they must interact. We also expect Globers to be familiar with the material laws and regulations applicable to business activities in their territory. No director, officer or employee shall engage in any unlawful activity whilst conducting Globant's business or in performing his or her day-to-day company duties, nor shall any director, officer or employee instruct others to do so.

Globant requires that Globers respect the current regulations of the business, complying with them loyally and work in good faith, adhering to the tasks expressed in the laws and/or existing conventions.

In terms of the respect and the caring of our employees freedoms and Human Rights, in 2018 we have established our <u>Diversity and Inclusion Fundamentals</u>. We understand that diversity and Inclusion are key to our business. Technology requires us to innovate constantly, and there is no way to innovate if we do not connect different points of view. We believe that a person who thinks and lives differently is not a threat or a problem, but on the contrary, offers everyone an opportunity to learn, grow, and co-create.

For us Diversity and Inclusion is more than our race, caste, color, origin, ancestry, genetic information, physical or mental disabilities, medical condition, religion, belief, citizenship, political activity or affiliation, veteran status, age, seniority, marital and civil status, pregnancy, childbirth, sexual orientation, sex or gender. There are the intersection of three of our core values as a company: to Constantly Innovate, being a Team Player, and the commitment of always Acting Ethically. That is why we advocate for an inclusive and diverse culture which crosses and affects every corner of our community.

This also means that we are and will be the main guardians of that spirit and we will not allow anything to threaten it. We pledge to provide all the necessary tools to make sure that all Globers feel comfortable, have the possibility to fully develop their potential, and have a diverse co-creation space with diverse points of view.

4. Prevention of modern slavery in our company and with our vendors



Since an important issue of our business is being close to our customers, we do not stop taking care of the welfare and integrity of our employees when it relates to relocation processes. In order to generate inclusion, promote cultural diversity and take care of the welfare and integrity of our employees and their families, we have set up a Relocation Policy.

All relocations are carried out under a meticulous Relocation Policy that has its pillars based on the respect for people and their family relationships. These principles demonstrate this point:

"Globers relocating with school-aged children, will enjoy a service pack that includes:

Educational consultancy

Globers will receive consulting services and school finding services, based on distance, personal needs, etc. Service includes guidance for the sign-up process, arranging appointments with school authorities, pros-and-cons assessments.

• Settling in process

Globers shall receive a service including: familiarization with the neighborhood, currency exchange briefing, assistance with housemaid hiring, opening bank accounts, etc."

Our Relocation Policy demonstrates that we care for diversity. In addition to analyzing business opportunities promote intra-company diversity, we also listen carefully to the needs and wants of out Globers to ensure a better quality of life and multicultural experiences in other geographies. With this in mind we offer different types of relocations:

- * Personal Motus (relocations on Glober's initiative): The Glober requires the relocation due to personal reasons.
- Relocations within the same country: relocations within the same country of origin.
- * Repatriation (return to country of original employment): The Glober needs to relocate back to the country of origin due to personal or work-related reasons.

5. Training and Development for knowledge dissemination on the IT Industry

We dedicate significant resources to the development and professional growth of our employees through learning experiences, career plans, mentoring, talent assessment, succession planning and performance management for Globers and people in the communities where we have operations.

Through "Globant Academy" we consolidate and formalize our efforts to provide a continuous learning program which is focused on four big Schools: Technology, Leadership, Corporate and Languages. Each created to promote a specific area of knowledge: science, self-development, agile methodologies and popular languages in the industry, correspondingly. Depending on the requirements of the particular program, we employ various learning methodologies such as e-learning, virtual learning, face-to-face and blended learning. Our



objective is to create a useful structure that serves our employees to continuously train and improve their skills.

In the last financial year we invested 144,000 hours of technical training for 6,300 Globers, and 40 technical trainings only for 460 people outside of the company, which received free capacitation on the latest technology giving significant improvement on their employability. Through all of these programs and educational initiatives, we have accomplished our goal of generating true empowerment of our employees and of all the people who are part of our ecosystem. In this way, we were able to give them better possibilities, not only to obtain better jobs in a booming industry, but also to pursue their professional development, both within our company, but also outside it, in the working market.

6. About our Supply Chain and our supplier's compromise

In Globant we support and are committed to developing and ensuring the fundamental Human Rights, and adhere to the principles of the United Nations Global Compact:

- Businesses should support and respect the protection of internationally proclaimed human
- rights; and make sure that they are not complicit in human rights abuses.
- Businesses should uphold the freedom of association and the effective recognition of the
- right to collective bargaining; the elimination of all forms of forced and compulsory labor; the
 effective abolition of child labor; and the elimination of discrimination in respect of employment
 and occupation.
- Businesses should support a precautionary approach to environmental challenges; undertake
 initiatives to promote greater environmental responsibility; and encourage the development
 and diffusion of environmentally friendly technologies.
- Businesses should work against corruption in all its forms, including extortion and bribery.

In relation to our total commitment to this cause, WE COMMIT TO request our major suppliers the adhesion and commitment, in written, with the ten principles of the United Nations Global Compact. All of these principles specifically tackle all modern slavery-related behaviours, as they state that:

Principle 1: businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Principle 3: businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Principle 7: businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Principle 10: businesses should work against corruption in all its forms, including extortion and bribery.

7. Our Ethics for Technology

In our commitment to the defense of human rights and individual freedoms, our strong commitment to the Global Compact principles and the fact we are a company in the IT sector dedicated to improving the quality of life of people, we are obliged to link our commitments with our business. Since the future of organizations depend on the research and development of Artificial Intelligence (AI), we formed our Artificial Intelligence Manifesto.

We understand AI should exist to cooperate with humans and to improve humanity, therefore elevating them. In terms of our use of data, we are committed to having clean and accurate data, compliant with laws and regulations, guaranteeing privacy and intimacy of all individuals to meet strict reliability, security, and integrity standards.

Fairness is one of our pillars: We are responsible for the data and how its use may affect society. We will promote data-driven outcomes that are unbiased in terms of race, ethnicity, gender, nationality, income, sexual orientation, ability, and political or religious beliefs. Avoid biased results as much as possible to eliminate unfair outcomes.

Transparency is one of our core values. We are committed to pursuing algorithmic accountability. We aim to create products that are transparent and open in their purposes and results; and exercise caution by anticipating adverse consequences.

We want to make a social contribution: to ensure access to relevant forms of knowledge, promoting fundamental skills and critical thinking among the community. Open, promote, and facilitate access to Al research for the community.

Most importantly, we will not pursue any Al applications which contravenes or may contravene any law or regulation, the public order and good morals, which includes, among others:

- 1. Al systems developed to spread untrustworthy information.
- 2. The dissemination or misuse of algorithms.



- 3. Misuse of sensitive characteristics such as race, ethnicity, gender, nationality, income, sexual orientation, ability, and political or religious beliefs.
- 4. Implementations that may cause or directly facilitate injury to people.
- 5. Projects that imply contravening widely accepted principles of international law and human rights.

8. Moving forward

This document represents our 2018 statement persuant to the UK Modern Slavery Act, to account for our efforts to mitigate all types of modern slavery in our business or supply chain. We understand modern slavery is a very complex issue that cannot be addressed in one year. We are devoted to tackling all types of modern slavery that may be present in our business and product chain, in order to protect our workers, all vulnerable groups and to take care of their environment. Hand in hand with this committed, there are a series of actions that we have established for the next financial year, including, among others, the requisite of written representations from our suppliers adhering to the Ten Principles of the UN Global Compact in connection with their relevant activities.

Néstor Nocetti

Executive Vice President, Corporate Affairs, Sistemas UK Limited Executive Vice President, Corporate Affairs, We Are London Limited

