

## **Environmental and Social Review Summary (ESRS)**

### **Project - La Lima Industrial Park Growth Facility – COSTA RICA**

**Original language of the document:** Spanish  
**Issuance date:** October 2025

#### **1. General Information of the Project and Scope of IDB Invest's Environmental and Social Review**

This transaction (the “Project”) consists of financing Zona Franca La Lima S.R.L. (the “Client”, the “Company”, or “ZFL”), for the expansion of its facilities. ZFL<sup>1</sup> is a development by Grupo Garnier & Garnier (“GG&G”)<sup>2</sup> and currently hosts 17 companies operating within a 285,000 m<sup>2</sup> infrastructure. The park is noted for its technological focus on advanced manufacturing, life sciences, and logistics centers, as well as the establishment of supplier enterprises and service companies, among others.

The environmental and social due diligence (“ESDD”) process included, among other aspects, a visit to ZFL; interviews and meetings with the Financial Manager, the Corporate Director, the Occupational Health and Safety (“OHS”) Officer, the Human Resources Manager, the ZFL Project Engineer, and the Company’s Sustainability Manager. The review of the environmental and social (“E&S”) and OHS information provided by the Client, such as: i) the ZFL 2024 Sustainability Report; ii) the GG&G 2024 Sustainability Report; iii) the Corporate Code of Ethical Conduct; iv) the Social Responsibility Report; and v) the following policies: (a) Family-Responsible Company, (b) Personnel Recruitment and Selection, (c) Induction and Orientation, (d) Talent Management, and (e) Compensation.

To ensure the Project's commitment to respect and protection of human rights, its zero tolerance for retaliation, and its commitment to providing and guaranteeing a safe environment for stakeholders to voice their concerns without fear of retaliation, the ESDD process also included the review of the following policies: i) of Gender Equity and Respect for Diversity; ii) Against Sexual Harassment; and iii) for Preventing Violence Against Women.

#### **2. Environmental and Social Categorization and Rationale**

The Project has been classified as a Category B operation according with IDB Invest’s Environmental and Social Sustainability Policy since it will likely generate the following impacts and risks during the construction stage, among others: i) noise and vibrations; ii) risks to the health and safety of workers; iii) the generation of both hazardous and non-hazardous solid waste; and iv) potential traffic conflicts; v) water and energy consumption. For its operational phase, the following impacts and risks have been recognized: i) CO<sub>2</sub> emissions; ii) air pollution; iii) the generation of both hazardous and non-hazardous solid waste; iv) water and energy consumption; and v) an increase in

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<sup>1</sup> ZFL is an industrial park located in Cartago Province, Costa Rica, which commenced operations in 2014. It spans an infrastructure of 100 hectares and generates over 9,500 direct jobs.

<sup>2</sup> With a 28-year track record, Garnier & Garnier has developed over 1.5 million m<sup>2</sup> across more than 35 projects.

labor risks. These impacts and risks are deemed to be inherent to the construction activity and/or the area, and will be of medium to low intensity.

The Project will trigger the following Performance Standards (PS): PS1: Assessment and Management of Environmental and Social Risks and Impacts; PS2: Labor and Working Conditions; PS3: Resource Efficiency and Pollution Prevention; and PS4: Community Health, Safety, and Security.

### **3. Environmental and Social Context**

#### **3.1 General Characteristics of the Project's site**

The Project involves the potential acquisition of land, earthworks, and the expansion of common areas within the park, all aimed at constructing industrial warehouses<sup>3</sup> for sale.

ZFLL is located in an industrial zone within the Cartago Province, Costa Rica. Its position is strategic for import and export activities, not only due to its geographic location but also because of the caliber of its human resources. The park employs over 7,000 individuals from the Cartago Province,<sup>4</sup> accounting for 85% of the total workforce. ZFLL has adopted an entrepreneurial vision focused on continuous growth, excellence, and sustainability, positioning it among the 50 most sustainable free trade zones in the world,<sup>5</sup> and it is the first Secure Free Trade Zone in the Americas certified by the OECD.<sup>6</sup>

GG&G has been issuing Sustainability Reports since 2019, and ZFLL since 2023. Among its sustainability recognitions for 2024, notable achievements include: i) first place in the real estate sector in the Merco ESG ranking;<sup>7</sup> ii) the Ecological Blue Flag ("Bandera Azul") award (BAE, for its Spanish acronym)<sup>8</sup> in the Climate Change and Sustainable Construction categories; iii) the Country Program on Carbon Neutrality (PPCN, for its Spanish acronym)<sup>9</sup> certificate; and iv) Model Zone for the Sustainable Development Objectives ("SDO") for its commitment to sustainable development. Additionally, as part of their Sustainability Strategy, they are working towards achieving zero waste certifications within the next five years.

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<sup>3</sup> Approximately 80,000 m<sup>2</sup>.

<sup>4</sup> The province has a total population of 550,655 inhabitants, according to data from the National Institute of Statistics and Censuses, 2023.

<sup>5</sup> According to GASEZ (Global Alliance of Special Economic Zones).

<sup>6</sup> Endorsement from the Organization for Economic Cooperation and Development (OECD) for its high standards in security, transparency, and responsible management.

<sup>7</sup> Merco (Corporate Reputation Business Monitor, for its Spanish acronym) is the leading corporate monitor in Latin America that has been evaluating the reputation of companies since 2000, based on a multi-stakeholder methodology comprising six assessments and over twenty sources of information.

<sup>8</sup> This annual award is given in Costa Rica to recognize the efforts of local committees dedicated to improving hygiene and environmental conditions, as well as adapting to climate change. The Sustainable Construction award is granted by the Federated College of Engineers and Architects of Costa Rica, while the Climate Change award is presented by the Costa Rican Electricity Institute (ICE, for its Spanish acronym).

<sup>9</sup> A voluntary mechanism that allows organizations, public and private companies, communities, and event organizers to report greenhouse gas (GHG) inventories; demonstrate actions to reduce, remove, and offset emissions; and strengthen decarbonization efforts. It is developed by the Climate Change Directorate (DCC, for its Spanish acronym) of the Ministry of Environment and Energy (MINAE, for its Spanish acronym).

### **3.2 Contextual Risks**

The contextual risk analysis for the Project does not show any indicators of high or moderate risk in any of the dimensions of security and conflict, political risk, economy, access to land and natural resources, social cohesion, gender-based reprisals, and labor rights.

Variations in precipitation levels and the occurrence of intense rainfall increase the likelihood of urban flooding, potentially affecting industrial facilities and logistical operations. However, the architectural designs of buildings and other infrastructures take into account the specific risks of each area to prevent or mitigate their effects.

Currently, dry climatic events do not pose a significant threat; however, due to climate change, a moderate variation in the frequency of droughts is expected, though these are not deemed a significant material risk to industrial facilities.

Finally, it should be noted that the area is subject to geophysical threats linked to earthquakes and volcanic activity—conditions that are not unique to the study area but are characteristic of Costa Rica as a whole. Consequently, the country enforces stringent regulations and a mandatory seismic construction code that establishes design and construction standards meant to ensure structural safety and adequate risk management in the face of these natural phenomena.

## **4. Environmental Risks and Impacts and Proposed Mitigation and Compensation Measures**

### **4.1 Assessment and Management of Environmental and Social Risks and Impacts**

#### **4.1.a Environmental and Social Management System**

ZFLL has developed its 2024 Sustainability Strategy, which defines a framework for action over the next five years. This strategy is based on the following tenets: (i) sector analysis and benchmarks; (ii) identification of impacts, risks, and stakeholder groups; (iii) stakeholder consultation; (iv) prioritization of risks and impacts; (v) definition of material issues; and (vi) design of action plans, objectives, targets, and indicators.

Prioritized material issues include social integration, well-being, governance, and environmental regeneration, from which the following lines of action have been drawn: i) risk and impact management to create environmental and social (E&S) value in nearby communities through public-private partnerships; ii) promoting employability by fostering the development of skills and job opportunities; iii) enhancing the well-being of the workforce by cultivating an organizational culture centered on growth, inclusion, and continuous training; iv) sustainable mobility by reducing the traffic and environmental impact of projects through sustainable local transport solutions; v) transparent and efficient management, aligning operations with international best practices; vi) a culture of integrity and compliance, ensuring high ethical standards across all operations; vii) sustainability in the supply chain, promoting responsible practices among strategic partners; viii) emission reduction by minimizing the carbon footprint through mitigation strategies and operational efficiency; ix) protecting and restoring ecosystems by promoting environmental balance in operational areas; x) enhancing resource use efficiency by optimizing energy and water

consumption in projects; and xi) construction waste management by implementing sustainable practices to minimize and recover the waste generated.

To integrate all these initiatives into ZFLL, the Client will develop an E&S Management System (“ESMS”) that will articulate, implement, and oversee the following nine parameters: i) policy; ii) identification of risks and impacts; iii) management programs; iv) organizational capacity and competency; v) emergency preparedness and response; vi) stakeholder engagement; vii) external communication and grievance mechanisms; viii) ongoing reporting to affected communities and stakeholders; and ix) monitoring and review.

#### 4.1.b Policy

The Client has established policies that reflect its commitment to sustainability. They include: i) a Well-Being Policy, which addresses matters such as health, labor safety, financial well-being, professional development, and human rights management; ii) a Corporate Policy, encompassing International Principles of Human and Labor Rights; iii) an Anti-Corruption Policy; iv) a Supplier Policy; v) a Supplier Selection Policy; and vi) an OHS Policy. Additionally, it maintains: i) a Development Manual (on the construction process); ii) Construction Works Regulations; iii) a Supplier Code of Ethics; iv) a Procedure for Monthly Accident Reporting; and v) a Summary of Environmental Commitments.

As part of its ESMS, the Client will develop an Environmental Policy, structured around three components: i) the Environmental Policy itself, focused on environmental objectives and principles; ii) a Social or Community Health and Safety Policy, which will regulate the Project’s relationship with the populations it interacts with; and iii) an Occupational Health and Safety (“OHS”) Policy, governing the manner in which internal tasks will be executed to prevent accidents or personal incidents.

#### 4.1.c Identification of Risks and Impacts

The identification of risks and impacts of the Project was carried out as part of the SETENA Environmental Licensing process.<sup>10</sup> As part of the ESMS, the Company will present a Procedure and an Identification Matrix of E&S and OHS Risks and Impacts for the operational phase.

##### 4.1.c.i Direct and Indirect Impacts and Risks

Among the main impacts and risks identified for the Project’s construction phase, the following stand out: i) noise and vibrations; ii) health and safety risks to workers; iii) generation of solid waste (hazardous and non-hazardous); iv) potential traffic conflicts; and v) consumption of water and energy. For the operational phase, the identified risks include: i) CO<sub>2</sub> emissions; ii) air pollution; iii) generation of solid waste (hazardous and non-hazardous); iv) water and energy consumption; and v) increased occupational risks.

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<sup>10</sup> In Costa Rica, Environmental Viability is a process that ensures project compliance with the legal E&S requirements. The National Environmental Technical Secretariat (SETENA, for its Spanish acronym) is the entity responsible for evaluating and approving environmental impact studies (EIS) and other related documents.

#### 4.1.c.ii Analysis of Alternatives

No alternatives analysis was conducted, as this is an expansion of an already established project.

#### 4.1.c.iii Cumulative Impact Analysis

A cumulative impact analysis was deemed unnecessary and therefore not conducted, given the nature of the project and its context.

#### 4.1.c.iv Gender Risks

The Company currently employs 59 people, 26 of whom are women. Among them, 2 hold managerial positions (out of the available 6).

The Company does not have a gender pay gap, and ensures equal opportunities regardless of age, gender, ethnicity, religion, sexual orientation, marital status or other conditions. It also has a Policy for Preventing Violence Against Women, a Zero-Tolerance Policy on Harassment, and a program called “Papá también cuida” (Dad Cares Too).<sup>11</sup>

Despite the progress made in gender equity, the Company continues to face structural challenges typical of the real estate and construction sectors, including low female representation in engineering and the absence of gender parity on the Management Committee.<sup>12</sup>

#### 4.1.c.v Gender Programs

The Company, a signatory to the WEPS,<sup>13</sup> maintains an institutional commitment to gender equality and the empowerment of women in the workplace, marketplace, and community.

#### 4.1.c.vi Climate Change Exposure

Costa Rica’s National Adaptation Plan (NAP) 2022-2026, along with the Action Plan for the National Climate Change Adaptation Policy (PNACC, for its Spanish acronym) 2018-2030, establish the objective of line of action 5: “Adapted and eco-competitive production systems,” to ensure that social and economic actors throughout the territory and across activity sectors, particularly small and medium-sized enterprises, become eco-competitive and resilient to climate risks. This is to be achieved by consolidating best practices and the sustainable management of natural resources across different ecosystems, alongside the promotion of preventive actions and awareness-raising commitments on adaptation. In this sense, the Project aligns with the aforementioned policies by incorporating resilient production practices, designs, and construction systems.

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<sup>11</sup> This is a Company program that allows fathers to access a weekly paid leave to encourage greater involvement in household responsibilities and childcare.

<sup>12</sup> 20% women and 80% men.

<sup>13</sup> The Women’s Empowerment Principles (WEPS) provide a holistic framework for companies to promote gender equality and women’s empowerment in the workplace, marketplace, and community, generating positive outcomes for businesses and society. Launched in 2010 by UN Women and the UN Global Compact, the WEPS are based on international labor and human rights standards, as well as the recognition that businesses have both a stake in and a responsibility regarding gender equality and women’s empowerment.

In environmental matters, the Company established a baseline in 2024 to measure its carbon footprint during the construction phase. It also implemented a tool that enables active projects to report monthly on their consumption of energy, water, and fuel, as well as waste generation. Notably, ZFLL has held Carbon Neutral Certification<sup>14</sup> since 2021, underscoring its commitment to sustainability and the mitigation of environmental impact.

#### 4.1.d Management Programs

The Company has an Environmental Management Plan (“EMP”) agreed upon with SETENA,<sup>15</sup> along with Zero Waste Management Programs set for the next five years and the BAE award, achieved by implementing responsible practices in resource management, energy efficiency, emission reduction, proper waste management, and biodiversity protection.

#### 4.1.e Organizational Capacity and Competency

The Client has a team that monitors sustainability issues, including a Sustainability Management department and an on-site team. Moreover, the Company’s corporate governance system encompasses a comprehensive set of measures, structures, policies, and processes designed to ensure strict compliance with existing laws and regulations. One of the main areas identified for enhancement was the integration of Environmental, Social, and Governance (“ESG”) risks into the strategic risk map.

#### 4.1.f Emergency Preparedness and Response

The Company has an Emergency Prevention, Preparedness and Response Plan, which includes: i) an analysis of threats and vulnerabilities; ii) a risk assessment matrix; iii) instructions for forming brigades and coordinating with external agencies, and iv) a work plan for conducting the Drill Planning.

#### 4.1.g Stakeholder Engagement

The Company maintains ongoing and transparent dialogue with its stakeholders. In 2023, it conducted stakeholder mapping and developed a materiality matrix<sup>16</sup> to define its sustainability strategy for 2024-2029. Key groups include customers, suppliers, employees, shareholders, communities, and regulators, with their expectations integrated through formal consultations. Open channels are maintained to facilitate reporting and dialogue.

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<sup>14</sup> The Carbon Neutral Certification is a formal recognition that validates that an organization has successfully measured, reduced, and offset its greenhouse gas (GHG) emissions, thereby achieving a net-zero emissions balance. This certification is part of global efforts to mitigate climate change and promote sustainable practices.

<sup>15</sup> National Environmental Technical Secretariat.

<sup>16</sup> A materiality matrix is a strategic tool used in sustainability and Corporate Social Responsibility (CSR) to identify and prioritize the most relevant issues for an organization and its stakeholders.

#### 4.1.g.i Disclosure of Information

The Company discloses its information through annual Sustainability reports and its website: <https://www.lalimafreezone.com/>

#### 4.1.g.ii Informed Consultation and Participation

Whenever a new project is developed, the Company conducts a stakeholder mapping specific to the environment in which it will be conducted. This practice is key to responsible management by ensuring that the concerns of communities, regulators, and other key stakeholders are taken into account during the planning and execution of each development. To strengthen this relationship, periodic meetings, surveys, roundtables, and digital channels are employed, fostering effective interaction.

#### 4.1.h External Communication and Grievance Mechanisms

ZFL will establish and implement an External Grievance and Claims Mechanism (MQRE, for its Spanish acronym) to collect any inquiries, grievances, or claims related to the Project.

### 4.2 Labor and Working Conditions

#### 4.2.a Working Conditions and Management of Worker Relationships

The Company ensures regulatory compliance in all areas in which it operates; it adheres to the guidelines established by Costa Rican labor legislation, including the Labor Code, the Labor Procedure Reform, and the Minimum Wage Decree; and it also complies with the provisions of the Costa Rican Social Security Fund (CCSS, for its Spanish acronym), Law No. 10,211 on paternity leave for biological and adoptive parents, and the National Insurance Institute (INS, for its Spanish acronym). During 2024, no cases of regulatory non-compliance were reported, reaffirming the Company's commitment to legality and best practices.

##### 4.2.a.i Human Resources Policies and Procedures

The Company has a Corporate Code of Ethical Conduct, as well as specific policies on personnel training, recruitment, and compensation.

##### 4.2.a.ii Working Conditions and Terms of Employment

One of the objectives of the Client's 2024-2029 Sustainability Strategy is to establish an organizational culture centered on diversity, inclusion, and continuous development, where respect and equity are fundamental principles. The Company believes that its success is based on the talent and well-being of its employees, which is why it seeks to foster a work environment that promotes the growth, development, and recognition of each person, ensuring fair conditions, learning opportunities, and a space focused on both personal and professional well-being.

The Company, within its material sustainability themes, implements measures aimed at improving quality of life, prioritizing the health, safety, and personal development of its employees, clients, and communities.

ZFLL has a Personnel Recruitment and Selection Policy that establishes guidelines for attracting and hiring qualified individuals within the organization, ensuring equal treatment throughout the process, without discriminatory conditions. In addition, it has a Compensation Policy that standardizes compensation and benefits practices, promoting external competitiveness and fair and equitable treatment for all members of the entity, regardless of age, ethnicity, gender, religion, race, sexual orientation, marital status, political opinion, national origin, social background, affiliation, disability, union membership, economic status, or any other condition.

#### 4.2.a.iii Workers' Organizations

In its commitment to complying with applicable local legislation in Costa Rica, the Company acknowledges workers' rights to form and participate in labor organizations. It also pledges to respect and fulfil the responsibilities set out in such legislation, including those specified in international conventions and treaties ratified by Costa Rica with the International Labor Organization ("ILO").

The Company has a Solidarity Association (AS, for its Spanish acronym) to which it contributes 5.33% of total salaries, while each employee contributes 6%. The employer's contribution is provided to the employee upon leaving the organization, regardless of the reason. Through the AS, staff can apply for loans at lower interest rates than those available on the financial market.

#### 4.2.a.iv Non-discrimination and Equal Opportunity

The Company strictly complies with current labor legislation and rejects any form of forced labor. It also guarantees equal opportunities, regardless of age, gender, ethnicity, religion, sexual orientation, marital status, or other conditions, and promotes a work environment based on respect, equity, and inclusion, ensuring that everyone feels valued and heard. The Company does not tolerate any discriminatory treatment and fosters professional relationships based on respect and dignity towards all persons involved.

#### 4.2.a.v Grievance Mechanism

ZFLL has an internal mechanism for addressing grievances and claims from employees through the email address [etica@garnier.cr](mailto:etica@garnier.cr). Reports are treated confidentially and are investigated by the Human Resources department and the Company's Ethics Committee.

#### 4.2.b Protecting the Workforce

The Company is committed to complying with applicable Costa Rican OHS laws and regulations, and to adequately monitoring the exposure of its direct and indirect employees to occupational hazards. Moreover, it maintains a zero-tolerance stance toward child and slave labor, for both employees and contractors and business partners.



#### 4.2.b.i Child Labor

Costa Rica is acknowledged as one of the six countries making significant strides in eradicating child labor. Furthermore, the Office for the Attention and Eradication of Child Labor and Protection of Adolescent Labor (OATIA, for its Spanish acronym)<sup>17</sup> within the Ministry of Labor and Social Security (MTSS, for its Spanish acronym) has established a roadmap to make Costa Rica a country free from child labor and its gravest forms.

ZFLL does not hire minors for its projects.

#### 4.2.b.ii Forced Labor

The Company, in alignment with current labor legislation, rejects any form of forced labor.

#### 4.2.c Occupational Health and Safety

ZFLL, in compliance with Costa Rican labor and OHS laws, including the National Occupational Health Policy, establishes specific guidelines and behaviors for employees and contractors in order to: i) protect the physical integrity of its employees; ii) prevent injuries and compromises to their health; iii) avoid impacts on process safety through the implementation and execution of procedures related to industrial safety and occupational health; and iv) identify hazards, assess risks, and establish prevention, correction, control, or transfer measures.

The Company guarantees safe work environments by implementing effective measures to prevent accidents and strengthen the culture of safety in its projects. In 2024, the Company made significant progress in occupational safety (including contractors and employees) through the following actions: i) enhanced training by mandating pre-start talks for 100% of personnel, including contractors, ensuring that all workers receive safety training before commencing work; ii) strengthened risk analysis through an improved application of the Job Hazard Analysis (JHA);<sup>18</sup> iii) coordinated efforts with professionals through periodic meetings with OHS experts to share experiences and update regulations; iv) regulatory compliance through weekly legal compliance audits on all projects, assessing aspects such as insurance, safety conditions, electrical risk management, work at height, excavations, and the use of personal protective equipment; and v) emergency management, by reinforcing monthly work with emergency brigades, ensuring their operations extend beyond documentation and that they are well-prepared to respond effectively to any eventualities.

In 2024, the Company recorded zero workplace accidents, marking two consecutive years without accidents.

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<sup>17</sup> Decree No. 27516-MTSS (1998).

<sup>18</sup> Job Hazard Analysis ("JHA") is a key tool for identifying and mitigating workplace hazards, with a focus on making information accessible to workers in the field.

#### 4.2.d Provisions for People with Disabilities

The Company promotes equal opportunities, fair working conditions and an environment free from discrimination and bias. Additionally, it applies Law 7600 on Equal Opportunities for People with Disabilities to all its activities and projects.<sup>19</sup>

#### 4.2.e Workers Engaged by Third Parties

To maintain healthy, transparent, and successful relationships with its suppliers, the Company has a solid governance framework supported by the following documents: i) Supplier Policy; ii) Supplier Code of Ethics; iii) Development Manual (pertaining to the construction process); iv) Supplier Selection Policy; v) Occupational Health and Safety Policy; vi) Construction Works Regulations; and vii) Monthly Accident Reporting Procedure. Through these instruments, the Company promotes responsible relationships with its suppliers, ensuring compliance with high standards of quality, environment, safety, and ethics at every phase of its projects.

#### 4.2.f Supply Chain

The Company recognizes that its value chain is key to the sustainable development of its projects, and to ensure that its network of suppliers aligns with its values of ethics, quality, and sustainability, it evaluates their performance in social, environmental, and governance aspects.

To this end, in 2024, the Company initiated a diagnostic process aimed at identifying improvement opportunities and strengthening the sustainable management of its critical suppliers. This diagnosis involved a prioritization and consultation approach with the following groups of suppliers: i) general contractors; ii) subcontractors; iii) design and inspection providers; and iv) project management service providers. The assessment included: i) document review and internal interviews to evaluate supplier management; ii) mapping and prioritization of critical suppliers based on their impact on projects; iii) a pilot study to assess ESG issues and their implementation within the value chain; and iv) a sustainability diagnosis of 24 strategic suppliers.

### 4.3 Resource Efficiency and Pollution Prevention

#### 4.3.a Resource Efficiency

The Company prioritizes environmental regeneration in its sustainability strategy, focusing on conserving biodiversity, using resources efficiently, and mitigating climate change. Thus, to reduce emissions, it aims to decrease its carbon footprint through efficiency strategies, optimizing energy and water consumption in its projects, and implementing sustainable practices to minimize and recover waste.

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<sup>19</sup> This law declares the integral development of the disabled population as a public interest and mandates equal opportunities for persons with disabilities. It ensures access to public and private institutions regarding the physical environment, transportation, information, and communication, among others. These measures aim to eliminate barriers that hinder access to physical spaces and information. Thanks to this law, individual needs are recognized, forming the basis for social planning.

#### 4.3.a.i Greenhouse Gases

In 2024, the Company established a baseline to measure the carbon footprint during the construction phase of its developments. Its objective is to quantify its Scope 1 and 2 Greenhouse Gas (GHG) emissions to propose effective reduction measures.

#### 4.3.a.ii Water Consumption

The Company has implemented a tool for projects to report monthly on energy, water, fuel consumption, and waste generation. This enables the analysis of the environmental efficiency of each development and facilitates informed decision-making to optimize resources and reduce environmental impact.

#### 4.3.b Pollution Prevention

ZFLL implements its Environmental Management Plan (“EMP”) approved by SETENA. All Company and contractor personnel receive environmental training at the start of the project and throughout its duration.

#### 4.3.b.i Waste

The Company conducts weekly inspections to comply with the Comprehensive Waste Management Law<sup>20</sup> and the requirements of the Costa Rican Ministry of Health, and supervises that waste management is aligned with the law, supported by certifications from authorized managers and oversight from its environmental manager. Each project has designated collection areas and trained personnel to ensure responsible waste disposal.

As part of its Sustainability Strategy, the Company, the Company aims to certify all its projects as zero waste within the next five years. To achieve this goal, it has implemented actions such as analyzing the current waste situation, evaluating certifications, training teams and contractors, and planning solutions to identified challenges. This year, the Company will initiate the zero-waste certification process for one of its projects in ZFLL.

### 4.4 Community Health, Safety and Security

#### 4.4.a Community Health, Safety and Security

The Company designs its projects to align with its sustainability principles. Accordingly, as part of its best practices, ZFLL has established partnerships with educational institutions and is implementing technical training programs along with concrete actions to improve the quality of life.

#### 4.4.a.i Infrastructure and Equipment Design and Safety

The Company has developed environments that integrate art, nature, sports, and connectivity, having built bike paths, green spaces, and sports and recreational areas, along with a 638 m<sup>2</sup> vertical

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<sup>20</sup> [Law No. 8839 for Integrated Waste Management – vLex Costa Rica.](#)

garden. Furthermore, each industrial warehouse is constructed with all necessary safety measures tailored to its specific business activities.

#### **4.4.a.ii Emergency Preparedness and Response**

The Company has an Emergency Prevention, Preparedness and Response Plan, which includes: i) an analysis of threats and vulnerabilities; ii) a risk assessment matrix; iii) instructions for forming brigades and coordinating with external agencies, and iv) a work plan for conducting the Drill Planning.

#### **4.4.b Security Personnel**

ZFLL is responsible for assessing, preventing, and supporting the management of security risks, including their monitoring and mapping. To this end, the Company directly hires unarmed security personnel.

### **4.5 Land Acquisition and Involuntary Resettlement**

The Project does not contemplate land acquisition, nor will it generate physical or economic displacement of nearby populations.

However, ZFLL is still in the process of identifying potential sites for growth, which could involve land acquisition. In this regard, if the purchase of such land is required, the Company will ensure that this acquisition is conducted on market terms (through voluntary purchase processes), avoiding involuntary physical or economic displacement. Nevertheless, should any involuntary physical or economic displacement arise from acquiring these lands, the Client will prepare an Involuntary Resettlement Plan (PRI, for its Spanish acronym).

### **4.6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

The Project is located within the buffer zone of the Cordillera Volcánica Central Biosphere Reserve, less than 500 meters from the Carpintera Hills Protected Zone, and within the El Rodeo, Cerros de Escazú, and La Carpintera Key Biodiversity Areas. In these areas, 14 species are reported as Critically Endangered (CR) or Endangered (EN), three of which are restricted in range.

However, the Project will not generate material impacts on biodiversity, as the scheduled activities will take place in already intervened areas within the Free Trade Zone.

### **4.7 Indigenous Peoples**

The Project does not intersect areas of Indigenous peoples and will not cause any impacts to these communities.

### **4.8 Cultural Heritage**

The Project does not involve intervention in areas of cultural heritage.

## **5. Local Access of Project Documentation**

The documentation relating to the Project can be accessed at the following link:  
<https://es.lalimafreezone.com/>.