

## Environmental and Social Review Summary (ESRS) Fibra Nova Project - Developing Sustainable Industrial Parks in Mexico

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### 1. General Information of the Project, and Overview of Scope of IDB Invest's Review

This transaction (the Project) consists of corporate financing for Fibra Nova (the Client, the Company, or Fibra Nova), a Mexican business<sup>1</sup> focused on the development and operation of industrial parks across Mexico. Fibra Nova is part of Grupo Bafar, a leading Mexican conglomerate in the agribusiness sector. Financing resources will be used to make capital investments (CAPEX) associated with the construction and operation of green-certified industrial parks, as well as the refinancing of bridge loans used to launch recent developments.

The environmental and social due diligence (ESDD) included, among other things, a visit to the Project site; interviews and meetings with the Company's team, as well as with contractors; and a review of environmental and social (E&S) and occupational health and safety (OHS) information provided by the Client, such as: (i) about human capital policy, environmental matters, code of conduct and ethics, conflict of interest, anti-corruption, integrity, crisis management, procurement, investment and environmental, social and governance (ESG) compliance of Grupo Bafar; (ii) solar panel specifications; (iii) environmental impact authorization for industrial park Bafar 1 and the environmental impact statement (MIA, in Spanish) resolution for industrial facility Bafar Norte; (iv) health, safety, and environment manual; (v) safety and health manual for the construction works (Dulsa 2022); (vi) contractors' audit documents; (vii) EDGE certifications;<sup>2</sup> (viii) second opinion report on a sustainability-related loan; (ix) KPMG climate study; (x) Fibra Nova 2025 sustainability report.

In order to make sure the Project is committed to respecting and safeguarding human rights, bears no tolerance to retaliatory actions, and provides for and guarantees a safe environment for the affected parties to express their concerns with no fear of retaliation, the ESDD also included a review of the human capital policy, and the code of conduct and ethics.

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

In accordance with IDB Invest's Environmental and Social Sustainability Policy, the Project has been classified as a Category B transaction because it may generate medium-intensity risks and impacts, such as: i) damage to the workers' health and safety; ii) production of hazardous and non-hazardous

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<sup>1</sup> It includes a real estate investment trust, a Brazilian financial instrument listed on the Institutional Stock Exchange (BIVA) that allows small and large investors to participate in the real estate market, in exchange for income from property portfolios (industrial facilities, shopping centers, offices) without having to purchase them directly.

<sup>2</sup> EDGE stands for Excellence in Design for Greater Efficiencies and is an international sustainable construction system created by the IFC (part of the World Bank Group) for emerging countries. It seeks to certify that new or existing buildings achieve minimum savings of 20% in energy, water, and embodied energy in materials, promoting faster, simpler and cheaper constructions than other standards.

waste; iii) generation of noise and vibrations, and potential alteration of air quality as a result of the construction activities; and iv) potential impacts on communities as a result of increased road traffic during the Construction and Operations phases. These impacts and risks are deemed to be of medium-low intensity and will mostly be reversible and manageable through proven plans and programs.

The Performance Standards (PSs) triggered by the Project are: i) PS1: Assessment and Management of Environmental and Social Risks; (ii) PS2: Labor and Working Conditions; (iii) PS3: Resource Efficiency and Pollution Prevention; (iv) PS4: Community Health, Safety and Security, and (v) PS5: Land Acquisition and Involuntary Resettlement.

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

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

Fibra Nova operates in 20 states of Mexico, distributed as follows: 52% of its portfolio is in Chihuahua, 18% in Ciudad Juárez, and 8% in Michoacán. It owns 125 properties, manages an area of 722,168 m<sup>2</sup>, keeps 2,118 hectares for agribusiness use<sup>3</sup>; and works in the following sectors: industrial (67%), agribusiness (14%), education (8%), engineering (6%), logistics (3%) and retail (2%).

Four facilities located in the city of Chihuahua and four located in Ciudad Juárez, all in the state of Chihuahua, have been selected as sample projects.

#### **3.2 Contextual Risks**

The comprehensive contextual risk analysis carried out for the Project, at both the national and subnational levels in Mexico, identified risks involving security, social cohesion and possible retaliation that may impact the execution of the Project. According to the 2024 National Urban Public Security Survey (ENSU, in Spanish), the perception of insecurity is 59.4% nationwide, 49.4% in the city of Chihuahua and 69.4% in Ciudad Juárez. Some of the main risks are the theft of materials or equipment, workers being targeted on their commutes and threats to security personnel.

In terms of social risks, data from the 2021 National Survey on the Household Relationship Dynamics (ENDIREH, in Spanish) indicates that 71% of women over 15 years of age in Chihuahua have experienced some form of violence (psychological, physical, sexual, economic or financial) in their lifetime. The prevalence in the workplace reaches 37.8%, positioning the state as that with the highest incidence nationwide. In addition, 30.9% of women report situations of workplace discrimination. Chihuahua's border location heightens these risks, increasing the presence of vulnerable migrant women, especially in relation to informal employment and human trafficking.

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

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<sup>3</sup> With walnut plantations.

## 4.1 Assessment and Management of Environmental and Social Risks

### 4.1.a E&S Management System

Although Grupo Bafar has a Technical Committee in place that deals with ESG issues and many sustainability initiatives, which include Fibra Nova, the Company does not yet have a formally structured environmental and social management system (ESMS). In this regard, Fibra Nova will establish an ESMS<sup>4</sup> that will, among other things: (i) enable it to properly manage E&S risks and impacts that may arise while its projects are under way; and (ii) incorporate performance monitoring and assessment processes using key performance indicators (KPIs).

### 4.1.b Policy

Fibra Nova has a corporate environmental policy in place that is applicable to employees, managers, contractors, subcontractors and third parties related to projects and operations, which establishes explicit commitments to: i) compliance with applicable environmental legislation; ii) prevention of pollution and efficient use of resources (water, energy, materials); iii) reduction of greenhouse gas (GHG) emissions and their alignment with the Paris Agreement; iv) protection of biodiversity through the application of the mitigation hierarchy; v) environmental education and awareness raising actions for employees, contractors and third parties; and vi) environmental governance, transparency and reporting mechanisms through “Bayar Transparente.”

### 4.1.c Identification of Risks and Impacts

Fibra Nova identifies the E&S risks and impacts mainly through environmental impact assessments (EIAs), which are required by Mexican law for executing these projects. In addition, the Company implements certain features and functionalities in its new developments to achieve recognized certifications, such as EDGE<sup>5</sup> and EDGE Advanced<sup>6</sup>.

However, there is currently no formal corporate procedure to systematically identify E&S risks, or a standardized mechanism to prioritize them according to their severity and probability. In this regard, Fibra Nova will establish a matrix-based mechanism for ongoing identification and assessment of environmental, social and occupational health and safety impacts and risks.

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

The main impacts that the Project will generate include, but are not limited to: i) effects on the workers’ health and safety; ii) generation of hazardous and non-hazardous waste; iii) generation of noise and vibrations and potential alterations to air quality as a result of the construction activities; iv) potential impacts on communities as a result of increased road traffic in the Construction and

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<sup>4</sup> Aligned with IDB Invest’s Guidance Note 1: Assessment and Management of Environmental and Social Risks and Impacts.

<sup>5</sup> EDGE stands for Excellence in Design for Greater Efficiencies and is an international sustainable construction system that certifies that new or existing projects achieve a minimum of 20% savings in energy, water, and embodied energy in materials, as compared to conventionally constructed buildings.

<sup>6</sup> EDGE Advanced is a higher tier sustainability certification, granted to buildings that achieve at least 40% energy savings on site, plus a minimum of 20% in water and 20% in embodied energy in materials, as compared to conventionally constructed buildings.

Operations phases; v) occupational risks associated with special work (work at heights and in confined spaces, welding, etc.); and vi) risks of workplace or sexual harassment in predominantly male environments.

Fibra Nova contractors have robust safety and health manuals for the construction works, emergency protocols, emergency response teams and drills in place, as well as a confidential report channel called “Bafar Transparente;” they also comply with the applicable Official Mexican Standards of the Ministry of Labor and Social Security (NOM-STPS)<sup>7</sup>.

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

Fibra Nova will develop a site acquisition manual, where it will include a formal process to analyze alternative locations that will be based on technical, environmental and social criteria aligned with best management practices, and will consider different site options depending on their potential impacts.

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

Fibra Nova’s existing projects have not gone through a cumulative impact analysis. The Company will carry it out as an integral part of the preparation of EIAs for its future construction projects<sup>8</sup>.

#### 4.1.c.iv Gender Risks

The likelihood of events of gender-based violence, exploitation, abuse and sexual harassment occurring in Fibra Nova projects is higher during the Construction phase, due to (a) the predominance of male workers and (b) the arrival of hundreds of employees, many of whom are staying in hotels, inns and residences within the Project’s area of influence, increasing exposure to gender-based violence and sexual harassment situations.

Fibra Nova addresses these risks through its code of conduct and ethics, which clearly establishes the prohibition of all forms of harassment, including sexual harassment, and expresses the Company’s commitment to maintaining a harassment-and-retaliation-free workplace, ensuring respect and dignity for everyone involved in its operations.

The code of conduct and ethics should not only be observed by Fibra Nova’s direct personnel, but also by contractors and subcontractors, who are required to act in accordance with the Company’s ethical and conduct principles in matters of legal compliance, anti-corruption, environment, safety, discrimination and harassment.

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<sup>7</sup> NOM-STPSs are mandatory technical regulations in Mexico that establish minimum health and safety requirements in the workplace. They are mainly aimed at preventing accidents and occupational diseases, protecting the physical integrity of workers and regulating work environments.

<sup>8</sup> In cases where the cumulative impact analysis undertaken during the EIA process justifies the need for a cumulative environmental impact assessment, it will be conducted in accordance with the guidelines set forth in IDB Invest’s Practical Guide for Cumulative Impact Assessment and Management in Latin America and the Caribbean. <https://idbinvest.org/es/publicaciones/guia-practica-para-la-evaluacion-y-gestion-de-impactos-acumulativos-en-america-latina>

#### 4.1.c.v Gender Programs

To effectively address gender risks in its operations, strengthen its commitment to creating a safe workplace—which is free from violence and discrimination—, and ensure respect and dignity for everyone involved in its activities, Fibra Nova will develop a comprehensive gender policy, which will: i) incorporate a specific protocol for the prevention of workplace harassment, sexual harassment and gender-based violence; ii) ensure an adequate response to these cases; and iii) focus especially on the protection of employees, including those of its contractors and subcontractors.

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

Climate analyses indicate that Chihuahua is the state with the highest historical temperature rise in Mexico (1971–2020), with significant increases in minimum and maximum values. In high emission scenarios, an increase in the frequency and intensity of heatwaves is projected, particularly in Ciudad Juárez and Chihuahua city.

Fibra Nova faces moderate exposure to physical risks associated with climate change, mainly driven by rising temperatures, scarcity of water resources and intensified extreme rainfall events. This situation is largely due to the location of its Project portfolio in the northern regions of Mexico, especially in the state of Chihuahua.

The Company manages its material physical climate risks with an EDGE-based adaptation strategy. Faced with rising temperatures and heatwaves, it prioritizes energy efficiency, improved thermal performance of buildings and optimized HVAC systems<sup>9</sup>. As a way of addressing water scarcity, it implements water efficiency and reuse measures, in compliance with the EDGE standard, which requires minimum 20% savings in water consumption. To mitigate acute risks from heavy rain and extreme wind events, it adopts resilient design criteria, high construction standards and long-lasting materials, strengthening the climate and operational resilience of its industrial portfolio.

#### 4.1.d Management Programs

Fibra Nova has formal environmental, social and safety management programs, involving waste management, energy and water efficiency, EDGE certification for industrial plants, climate risk assessment, the adoption of OHS systems, mandatory training and a strong ESG position in line with Grupo Bafar.

These programs are supported by corporate policies, operating manuals and procedures that ensure regulatory compliance, risk mitigation and continuous improvement in ESG performance.

#### 4.1.e Organizational Capacity and Competency

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<sup>9</sup> HVAC systems are the heating, ventilation and air conditioning systems used to ensure adequate operating conditions in industrial plants and offices. These systems are relevant for water risk management, as certain types of HVAC systems may consume water.

The Company has: i) a Human Resources and Construction Department; ii) an on-site safety supervisor; iii) an operational ESG Committee (created in 2024); and iv) a Technical Committee and an Audit Committee.

Fibra Nova manages the environmental, social and health and safety aspects of its contractors through a comprehensive set of corporate policies, operation manuals and mandatory procedures. Under this framework, compliance is required with environmental guidelines (waste management, efficient use of resources and pollution prevention), social and labor principles (human rights, non-discrimination and prohibition of child and forced labor) and OHS systems, including compulsory onboarding processes, the use of personal protective equipment (PPE), risk assessment, control of high-risk work and the execution of contingency plans. Monitoring, auditing and enforcement of sanctions ensure the correct implementation and improvement in contractor performance.

#### 4.1.f Emergency Preparedness and Response

Fibra Nova has operational emergency plans, integrated into its health, safety, security and environment (HSSE) manuals, and its health and safety manual for the construction works, all of which are mandatory for employees and contractors. These plans include evacuation procedures; details of how emergency response teams work; response protocols in cases of fire, accidents and events involving chemicals; rescue in high-risk work; drill instructions, and continuous improvement mechanisms. Emergency management practices, supported by the environmental policy and the ESG actions of Grupo Bafar, comply with the applicable Mexican regulations.

#### 4.1.g Monitoring and Review

The Company is currently producing a sustainability report on a regular basis, in which it summarizes its performance in E&S aspects, as well as in terms of energy consumption, water use, emissions management and certification status. Additionally, Fibra Nova monitors and reviews the HSSE aspects of its contractors and subcontractors, ensuring that its standards are maintained throughout the value chain.

The Company will, however, strengthen its monitoring and review approach by consolidating its ESMS, which, in addition to E&S monitoring plans, will include clear performance indicators, develop control matrices and define periodic review and adjustment processes.

#### 4.1.h Stakeholder Engagement

Fibra Nova identifies and engages with various stakeholders (such as authorities, clients, contractors and others) both during the environmental assessment process and in the Operations phase of its projects. However, since these interactions are primarily reactive and do not occur as part of a structured ongoing engagement process, the Company will develop a stakeholder engagement plan that will include: i) the identification of key players, ii) a social risk analysis, iii) the design of specific engagement strategies, iv) a protocol for handling the grievance mechanism, v) a clear definition of roles and responsibilities, and vi) the incorporation of monitoring and continuous improvement mechanisms.

#### 4.1.h.i Disclosure of Information

Fibra Nova consistently discloses E&S information through: i) the mandatory regulatory processes required to obtain environmental permits and licenses; ii) public, regular corporate ESG reports; and iii) its website<sup>10</sup>.

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

Mexican law states that real estate-industrial projects, such as those developed by Fibra Nova, are not automatically required to carry out public consultations<sup>11</sup>. Projects considered of low or medium impact are legally compliant by submitting the MIA and making the environmental report available to the public, with no further formal public consultation.

When communities are identified as affected by the projects, and they are considered exposed to risks and adverse impacts, the Client will implement a structured consultation process. In order to ensure responsible management, the Company will add a consultation protocol to its ESMS, which will guide the process and set further actions if such process is required.

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

Fibra Nova has set up its corporate channel “Bafar Transparente,” which: i) allows for reporting anonymously; ii) covers employees, contractors and third parties; and iii) addresses cases of harassment, abuse of power, corruption and malpractice.

The Company will formally integrate the mechanism into the ESMS, with specific procedures to deal with grievances related to the environment and the community (including from vulnerable groups) and well-defined response times and escalation processes.

## 4.2 Labor and Working Conditions

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

Grupo Bafar has a workforce of more than 14,000 direct employees and more than 20,000 indirect employees<sup>12</sup>. However, Fibra Nova operates with a much smaller, more efficient administrative structure, and maintains only six permanent full-time employees. The majority of the workforce involved in Fibra Nova’s operations and projects are made up of contractors and subcontractors.

Grupo Bafar (the Group) has comprehensive policies that make up a solid system of labor and human resources management practice. These policies are aligned with corporate best practices, ESG standards, as well as decent work principles.

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<sup>10</sup> <https://fibranova-esg.investorcloud3.net/en/>

<sup>11</sup> The General Law of Ecological Balance and Environmental Protection (LGEEPA, in Spanish) establishes that public consultation is a conditional mechanism that can be triggered only as requested by the community or deemed necessary by the environmental authority, especially in those projects causing significant environmental impacts.

<sup>12</sup> According to its corporate report (August 2025).

Across the Group, talent management is grounded in legal compliance, equity and the promotion of continuous employee development. This approach ensures that both management practices and working conditions meet criteria of transparency and fairness, ensuring equal opportunities and professional growth.

These guidelines and policies adopted by Grupo Bafar are fully relevant to Fibra Nova; therefore, the same high standards of labor management and talent development are applicable to all its subsidiaries.

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

Grupo Bafar ensures formal, regulated and documented working conditions that comply with current legislation and the terms of individual or collective agreements. All employment relationships are formalized through written contracts, which may be permanent, temporary, project-based or for internships; and recruitment requires compulsory registration with the labor and social security authorities to ensure legal compliance and protection of employees.

The Group's corporate human capital policy establishes clear human resources management parameters, such as: (i) defined salary scales; (ii) job structures and compensation ranges; (iii) occupational health programs and preventive campaigns; (iv) compliance with Mexican Official Standards on occupational safety and health; and (v) guidelines on dress code, conduct, substance use, respect, non-discrimination, and harassment prevention applicable to all personnel. The policy sets out guidelines for recruitment and selection processes, hiring and employment arrangements, as well as compensation and benefits. In addition, the Company has guidelines for staff training and development, internal mobility, health, safety, well-being, employee separation and termination, and disciplinary procedures.

The Group, with its policy, guarantees traceability and internal control in each business unit and maintains legal compliance, as well as consistency in human capital management, thus promoting safe, equitable and respectful work environments, under a comprehensive, transparent approach to workforce management.

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

Fibra Nova has a small permanent workforce, with working conditions being regulated by the guidelines enforced across Grupo Bafar.

Across the Group, labor relationships management is grounded on such key principles as legal compliance, respect, integrity and transparency. Its internal policies are the way to promote labor relationships based on decent, equitable and non-discriminatory treatment. In this regard, it is guaranteed that there is no distinction based on gender, age, origin, religion, disability, trade union membership or other personal condition, thus consolidating an inclusive, fair work environment.

For the prevention and correct management of labor disputes, Grupo Bafar has established clear mechanisms covering situations such as conflicts of interest, family relationships in the workplace

and relationships with suppliers, clients or trade unions. In addition, employees have formal reporting and communication channels, such as “Bafar Transparente,” a tool that allows for reporting irregularities of work, ethical or conduct nature. It ensures confidential reporting and protection against possible retaliation.

As for disciplinary management, the measures are clearly defined and implemented in a proportionate manner as per the disciplinary action policy and applicable labor laws. This approach helps to maintain an orderly work environment that is aligned with the applicable regulations.

Fibra Nova recognizes and respects the labor and human rights of its employees, keeping committed to international standards, such as the Sustainable Development Goals (SDGs) and decent work principles.

#### 4.2.a.iii Worker Organizations

Fibra Nova explicitly recognizes and respects the fundamental right of its employees to freedom of association and collective bargaining. In Mexico, this right is supported by the Federal Labor Act, which guarantees all workers have the right to form trade unions and associations to safeguard their rights and interests within the work environment.

Currently, there are several trade unions linked to Grupo Bafar that are duly registered with the Federal Center for Labor Settlement and Registration (CFCRL, in Spanish). Among them are the Sindicato Único de Trabajadores de Bafar, C.T.M. (National Union of Bafar Workers, C.T.M)<sup>13</sup> and the Sindicato Único de Trabajadores de la Industria de la Carne, Alimentos, Similares y Conexos de la República Mexicana (Mexican National Union of Workers in the Meat, Food, Related and Allied Industries),<sup>14</sup> which represent the interests of employees and facilitate social dialog within the organization.

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

Grupo Bafar’s ESG policy establishes clear principles on diversity, equity and inclusion, as well as strict guidelines to prevent any kind of discrimination. These robust guidelines ensure that all people are encouraged to participate, without distinction, and that equal opportunity is guaranteed in all work processes.

In line with its commitment to maintaining a fair, respectful work environment, Fibra Nova actively promotes a workplace with equity and mutual respect. In 2024 and 2025, the organization recorded no incidents of discrimination, which proves its internal policies are effective and there is a consolidated inclusive culture within the organization.

#### 4.2.a.v Retrenchment

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<sup>13</sup> Registered under No. 882 in Chihuahua; established on August 20, 2001; affiliated with the CTM; and comprising 1,008 members.

<sup>14</sup> Historical registration record; current executive committee (2025–2027); affiliated with the CTM and a local federation.

Although workforce reductions are considered only as an exceptional measure and do not constitute a recurrent practice in human resources management, Grupo Bafar executes them in compliance with both the provisions in the current labor legislation and the principles of business ethics and the ESG standards. When layoffs are necessary, they are carried out following formal procedures, ensuring clear and accurate documentation of the grounds for termination and the timely payment of final settlements or severance, among other provisions.

In addition, throughout the retrenchment process, Grupo Bafar makes sure union rights and the provisions in collective agreements are fully observed.

#### 4.2.a.vi Grievance Mechanism

Fibra Nova, together with Grupo Bafar, operates a formal channel called “Bafar Transparente” to receive reports and grievances. This corporate mechanism is available via the web, email, WhatsApp and a hotline, which facilitates access to both employees and contractors and people outside the organization.

Fibra Nova will develop a specific protocol for dealing with internal grievances, which will define clear deadlines for case management; establish procedures for registration, escalation, closure and feedback; maintain anonymous record of cases dealt with; and ensure the traceability of reports entering into the general channel. Fibra Nova will inform all its direct and outsourced personnel about the existence of the mechanism, and how to use it.

#### 4.2.b Protecting the Workforce

Fibra Nova is committed to complying with applicable Mexican OHS laws and regulations and to properly monitoring the exposure of its direct and indirect employees to occupational hazards. Workers’ protection (own and on-site) is managed through: i) a set of policies that require compliance, prevention and a safety culture; and ii) health and safety manuals applicable on-site, including rules, safety committees, emergency response teams, permits for high-risk activities, mandatory PPE, and emergency procedures.

##### 4.2.b.i Child Labor

The Federal Labor Law in Mexico prohibits the employment of minors under 15 years of age in any type of work, and allows those aged 15 to 18 to work, subject to certain conditions. In addition, the Ministry of Labor and Social Security has published guides for employers on the prevention and eradication of child labor, and the protection of teenage workers.

Fibra Nova, in compliance with Mexican law, prohibits child and forced labor.

##### 4.2.b.ii Forced Labor

Fibra Nova prohibits forced labor; the ESG policy reinforces the human rights approach applicable to employees and third parties across the Group.

#### 4.2.c Occupational Health and Safety

As a real estate developer, Fibra Nova does not hire direct labor; all construction, refurbishment, and outfitting activities are subcontracted from specialized companies registered with the labor and social security authorities. In this way, the OHS management in Fibra Nova projects is entirely the responsibility of its contractors, who must (a) have formal safety systems based on regulatory compliance, contractual allocation of obligations and administrative and documentary oversight, (b) comply with relevant legislation, and (c) assume employer responsibilities, ensuring regulatory alignment.

Contractors must deploy minimum practices such as a safety policy focused on prevention; mandatory use of PPE; documented safety onboarding; specific risk assessment; safety and health, and civil protection committees; emergency response teams; drills; emergency plans; signage; access control and protection of the public (fencing, evacuation routes, fire extinguishers). In addition, they must investigate and report accidents, correct faults, and ensure basic health conditions: drinking water, toilets, first aid kits, and emergency contact directories.

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

Fibra Nova, through Grupo Bafar's corporate policies and employment guidelines, provides for non-discrimination, equal opportunity and respectful treatment for all workers, including people with disabilities.

The Company promotes an inclusive, non-discriminatory work environment. Its policies prohibit any distinction based on personal conditions, including disabilities, both during the recruitment, hiring, tenure and professional development processes, as well as in the day-to-day handling of labor relationships.

The provisions for people with disabilities are part of the corporate human capital policy and the ESG policy of Grupo Bafar, which are applicable to Fibra Nova. These policies establish principles of equity, respect, fair treatment and compliance with current Mexican labor legislation.

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

Fibra Nova manages workers hired by third parties through a responsible hiring model, which requires contractors to: i) fully comply with labor, social security, and OHS legislation; ii) ensure all hires are supported by formal contracts; and iii) observe corporate integrity policies.

#### 4.2.f Supply Chain

Fibra Nova manages its supply chain with a set of corporate policies that prioritize integrity, transparency and regulatory compliance, supported with a strategy of diversification of national and international suppliers, thus contributing to a robust, traceable supply chain in line with ESG principles.

Fibra Nova manages its suppliers primarily with: (i) the corporate procurement policy, which establishes guidelines to select, evaluate and engage suppliers under criteria of legal compliance, efficiency, transparency and traceability; (ii) the integrity policy, which promotes ethical practices throughout the value chain and requires compliance with applicable law; (iii) the anti-corruption policy, which prohibits any form of bribery, corruption or improper practices in procurement processes; and (iv) the conflict of interest policy, which seeks to prevent procurement decisions influenced by personal or external interests.

Fibra Nova plans to purchase solar panels for its projects. Given the fact that the supply chain for photovoltaic modules, particularly the production of silicon and polysilicon, may globally present potential risks associated with working conditions and human rights, the Project will adopt a risk-oriented due diligence approach to the solar equipment supply chain, including: (i) the selection of internationally recognized suppliers with valid quality, environment and occupational safety certifications; (ii) the inclusion of contractual commitments prohibiting child and forced labor, in accordance with fundamental ILO<sup>15</sup> conventions; and (iii) the monitoring of relevant public information and international standards on social risks in supply chains of the solar sector.

### **4.3 Resource Efficiency and Pollution Prevention**

#### 4.3.a Resource Efficiency

Fibra Nova prioritizes resource efficiency as the core element of its sustainability strategy, focusing on improving the energy, water and material performance of its industrial assets. As owner and manager, it focuses on structurally optimizing the efficiency of the properties involved, beyond the processes of the tenants themselves.

The Company uses EDGE certification to measure and manage a reduction of at least 20% in energy, water and materials as compared to local baseline. This standard guides new construction, refurbishment and conversion projects within the portfolio.

Some interventions include better thermal performance, energy- and water-efficient systems, and the selection of materials with lower embodied energy. KPIs are used to set increasing targets, which seek to EDGE-certify at least 60% of the industrial portfolio by 2030.

Efficient resource management contributes to mitigating operational and financial risks, especially in regions with high water and energy pressure.

#### 4.3.a.i Greenhouse Gases (GHGs)

Fibra Nova supports the Paris Agreement and is firmly committed to reducing its carbon footprint in its operations. This means managing all its emissions and promoting low-emission technologies within the Company by developing innovative programs that seek to decrease emissions and increase climate resilience and the use of renewable energy.

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<sup>15</sup> International Labor Organization.

While the Group's ESG policy clearly underscores its commitment to reducing emissions into the environment and controlling GHG emissions by developing sustainable projects and optimizing internal processes, the Company does not yet have a formal, quantitative corporate GHG inventory. Therefore, it will prepare GHG emission inventories for all its projects, covering direct emissions (Scope 1), indirect ones derived from energy consumption (Scope 2) and those associated with the value chain (Scope 3).

#### 4.3.a.ii Water Consumption

Fibra Nova manages water consumption through a preventive, structural and verifiable approach, focused on the water efficiency of its real estate portfolio. Under the EDGE certification and through progressive asset modernization, the Company systematically reduces the amount of water used in its properties, thus strengthening the resilience of the portfolio to water stress and preserving its long-term value. To this end, it has implemented, among others, the following measures: i) the installation of water-efficient faucets in bathrooms and kitchens; ii) the use of low-flow toilets; iii) the installation of efficient irrigation systems; iv) the reduction of irrigated areas when technically feasible; and v) the selection of design solutions that reduce the demand for water in common and service areas.

#### 4.3.b Pollution Prevention

Fibra Nova approaches pollution prevention from a structural, preventive approach, which is consistent with its business model as owner and manager of industrial real estate assets. Its strategy recognizes that, although it does not operate its own production or industrial processes, the design, construction, refurbishment and technical performance of the properties may directly lead to potential environmental pollution.

In this context, pollution prevention is mainly managed through sustainable construction criteria, resource efficiency and indirect impact control, rather than through operational controls over third-party production processes.

#### 4.3.b.i Waste

Since Fibra Nova does not generate industrial or operational waste from production processes, most of the waste associated with its assets comes from the construction and refurbishment activities in the properties involved. The Company does not directly manage the collection or final disposal of waste generated by its tenants' operations; these responsibilities fall contractually to the latter, in accordance with the applicable regulations. In this context, the Company's strategy focuses on reducing waste generation from the design of the assets and the selection of materials, as well as minimizing the indirect impacts associated with real estate infrastructure.

Waste management at Fibra Nova is based on prevention at source, prioritizing waste-reducing construction solutions, and minimal waste production through material efficiency criteria. The smaller the volume and type of materials used, the smaller the volume of construction and

demolition waste generated; likewise, the environmental impacts associated with its management are reduced.

#### 4.3.b.ii Hazardous Materials Management

Handling, storing, transporting and disposing of the hazardous materials used by tenants is their own responsibility under the applicable environmental and safety legislation.

Fibra Nova acts as a real estate asset manager, focusing on minimizing structural risks and preventing impacts arising from the design and technical specifications of the property.

Contractors and subcontractors are responsible for the safe handling of hazardous materials (e.g., fuels, paints, solvents, oils). These obligations are set out contractually and must be fulfilled in accordance with environmental, and OHS regulations.

### **4.4 Community Health, Safety and Security**

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

Fibra Nova addresses community health and safety issues with an indirect prevention approach based on real estate management. While the Company does not engage directly with the communities, it is aware that the development, construction and operation of industrial parks and facilities can involve risks to surrounding populations if not properly managed. Therefore, its strategy focuses on preventing adverse impacts on the social environment, prioritizing compliance with current regulations, safety by design in its assets and rigorous risk management practices at all stages of the property life cycle.

To guarantee the protection of community health and safety, Fibra Nova makes sure that its projects secure the relevant environmental authorizations, such as environmental screening report (*Informe Preventivo*) preventive report or the MIA<sup>16</sup>. These instruments establish mandatory prevention and control measures, directly related to community interests. These measures include: (i) the control of dust and particulate emissions during the construction works; (ii) compliance with noise thresholds established by local regulations; (iii) the proper management of solid and hazardous waste, avoiding disposal in public spaces; (iv) the control of stormwater runoffs within the site, to avoid affecting roads or residential areas nearby; and (v) the restriction of activities that pose a risk to others, such as burning waste, spills or improper storage of substances.

The implementation of these measures contributes significantly to reducing nuisances, accidents and environmental risks for neighboring communities. From the Design and Construction phase, Fibra Nova incorporates criteria that bolster safety in the surrounding communities, such as: i) the clear physical delimitation of the premises, to prevent unauthorized access; ii) the design of maneuvering yards and internal access roads, in order to reduce interference with public roadways;

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<sup>16</sup> The environmental screening report and the MIA are technical documents required in Mexico by the Ministry of Environment and Natural Resources (SEMARNAT) to assess the environmental impact of works or activities, according to the LGEEPA. The environmental screening report (*Informe Preventivo*) is for low-impact or regulated projects, whereas the MIA is a full study necessary for projects with greater potential impact.

iii) the provision of adequate infrastructure for the efficient management of internal and external traffic; and iv) the construction of facilities that meet the requirements of civil protection and structural safety established by current regulations.

Fibra Nova also has a corporate crisis management policy, with guidelines to respond to and communicate extraordinary events, coordinate actions with the relevant authorities and protect people, assets and the environment in emergency situations.

Finally, it is important to note that Fibra Nova is part of the Grupo Bafar ecosystem, which promotes social and community initiatives through the Bafar Foundation. These actions, focused on health, nutrition, and well-being in the regions where it operates, indirectly enhance the social environment in which Fibra's real estate assets are located.

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

Fibra Nova's main management mechanism is safety by design from the conceptual stage, prioritizing: i) Class A<sup>17</sup> infrastructure, with technical specifications according to national and international standards; ii) a design that reduces structural, operational and emergency risks; and iii) the integration of safety considerations without direct control over the tenants' production processes.

The Company's real estate assets generally consider the following safety elements: i) structural designs in accordance with applicable construction regulations, which reduces risks in case of natural events; ii) physical delimitation of land, which controls access and prevents unauthorized entry; iii) maneuvering yards, internal roadways and access roads designed for heavy traffic, which minimize risks of accidents; iv) electrical, water supply, and stormwater systems designed for safe and efficient operation; and v) infrastructure that facilitates the implementation of civil protection programs, such as evacuation routes, emergency exits and signage.

Infrastructure design takes the following into account: i) the conditions for emergency response (fire, accidents, evacuation); ii) compatibility with the internal civil protection programs required by local regulations; and iii) the operational resilience of the asset, protecting people, property and the environment.

#### 4.4.a.ii Community Exposure to Disease

The main potential risks of community exposure to diseases associated with Fibra Nova's assets include: i) dust, waste and wastewater generated during the construction works; ii) temporary deterioration of sanitary conditions for construction workers; iii) possible proliferation of vectors if waste or green areas are not properly managed; and iv) impact of the staff's and the contractors' movement during construction works. These risks, typical of real estate development, are managed by: i) correct waste management; ii) wastewater control; and iii) sanitary measures on site (toilets, cleaning).

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<sup>17</sup> Class A projects are high-quality real estate assets, designed and built under superior standards in terms of design and technical specifications, strategic location, construction quality, services and infrastructure and tenant profile.

The Company will incorporate community health risk into its ESMS risk matrix, especially for works with high concentration of workers and areas close to communities. In addition, it will develop a protocol for disease prevention and management (PDPM) for the Construction phase, including training and awareness-raising actions.

#### 4.4.a.iii Emergency Preparedness and Response

Fibra Nova manages emergency preparedness and response for events that may impact the community through a corporate crisis management policy, which aims to ensure a timely, coordinated and controlled reaction to events that may endanger human life, safety, the operation, the reputation of the Company or its social environment.

While the policy is primarily oriented to corporate crisis management, its provisions indirectly contribute to the protection of surrounding communities by prioritizing human life and safety, ensuring a structured response to accidents, environmental events or natural disasters, and ensuring clear communication with relevant authorities and external stakeholders.

#### 4.4.b Security Personnel

Fibra Nova is responsible for assessing, preventing and managing security risks, including monitoring and mapping them. For this reason, the Company hires unarmed security personnel.

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

The Company has an investment policy that establishes the criteria for the acquisition and development of real estate assets through a comprehensive assessment of the property from the legal, technical and environmental perspective. This policy emphasizes compliance with current regulations, the legal security of land tenure and the suitability of the asset for industrial use.

The Company acquires land mainly through voluntary purchases, prioritizing land that is suitable for industrial use and private land with clear and secure title. To date, there have been no documented cases of involuntary resettlement or physical or economic displacement.

The management of these processes is supported by legal due diligence and the necessary municipal and environmental authorizations. However, in order to align its practices with international standards, Fibra Nova will develop a site acquisition manual to verify, prior to any acquisitions of land for new development, that: (i) sales agreements are negotiated under free market conditions and with the informed participation of all parties involved; and (ii) such acquisitions do not involve the physical or economic displacement of people who, even though they do not formally own the property, occupy, exploit or rely on such land for other resources.

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

Fibra Nova manages biodiversity on three core pillars: the selection and strategic location of projects; compliance with current environmental regulations; and the design of infrastructure that minimizes the impact on the natural environment.

The Company targets its efforts towards the acquisition and development of land suitable for urban or industrial use, prioritizing those plots that have been previously transformed or that are located within existing industrial parks. Likewise, areas of low ecological value are selected, deliberately avoiding intact natural ecosystems.

All Fibra Nova projects have the required environmental authorizations, such as the environmental screening report or MIA, in accordance with the guidelines established by the environmental authority. These assessments include, as appropriate, the identification of flora and fauna, verification of the absence of natural protected areas on the land, and the implementation of measures to prevent biodiversity impacts during the Construction phase. Compliance with these resolutions is the main operational instrument for responsible biodiversity management.

Prevention, through appropriate site selection, represents the main mechanism for managing biodiversity risks. Therefore, Fibra Nova will develop a site acquisition manual, which will allow to verify, before any acquisitions of land for new development, the current and previous use of land, the absence of critical habitats or areas of significant biodiversity importance, and the absence of impacts on ecosystem services on which communities depend for their livelihood.

#### **4.7 Indigenous Peoples**

Fibra Nova projects are carried out exclusively on private or industrial land. This decision ensures that land traditionally used by indigenous peoples is not affected and that there are no impacts on traditional livelihoods, ancestral natural resources or cultural practices of indigenous communities.

Fibra Nova will include in its site acquisition manual a procedure to record any type of indigenous presence in the areas of interest and that will contain site eligibility criteria when there are material negative impacts on those communities.

#### **4.8 Cultural Heritage**

The residual risk linked to cultural heritage is managed through compliance with the required construction licenses and environmental authorizations (such as the environmental screening report or MIA). When required by law, these authorizations provide for the protection of historical and archaeological heritage. They also express the obligation to immediately suspend works and notify the competent authority in case of chance finds of cultural assets.

Fibra Nova will include specific preventive guidelines for dealing with chance finds in its site acquisition manual.

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

The documentation related to the project may be accessed using the following link: [Projects | BID Invest](#)