

TRAXIÓN

LIFE IN MOTION

**ENVIRONMENTAL,
CLIMATE CHANGE AND
BIODIVERSITY POLICY
GRUPO TRAXION, S.A.B.
DE C.V.**

July 2024

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1. INTRODUCTION

Given that anthropogenic activities generate various negative impacts on the environment, companies have the responsibility to operate and be competitive without negatively affecting the environment.

These impacts also pose risks for companies, associated with climate change, the alteration of ecosystems and the loss of biodiversity, among other factors.

At Grupo Traxión S.A.B. de C.V., we are aware that our operations and activities are related to various environmental aspects that could potentially result in negative impacts on the environment, climate change, nature, and biodiversity.

This policy addresses both the management of environmental issues, climate change, and the impact on nature and biodiversity that must be developed in daily operations and activities, as well as in strategic decision-making and the disclosure of relevant information to different stakeholders.

2. OBJECTIVE

To prevent and minimize the environmental impacts on the population and ecosystems, as well as address risks and opportunities for Grupo Traxión related to climate change, nature, and biodiversity.

It purports to be achieved through the control of operations, the adoption of cleaner technologies and fuels and the implementation of other good environmental practices in processes and activities, always with a focus on continuous improvement and based on compliance with current and applicable laws.

Likewise, this policy aims to raise awareness and engage our value chain, including suppliers, third-party operators involved in asset-light models, partners, and customers.

3. SCOPE

This policy is applicable to Grupo Traxión S.A.B. de C.V. (hereinafter “Traxión” or “The Group”) and its subsidiaries and affiliates (hereinafter “business units”).

It is mandatory for all employees at any hierarchical level, as well as for third parties within our facilities and/or with whom we have a contractual relationship, such as: contractors, suppliers, customers, partners, etc.

4. REFERENCES

4.1. Internal

- Code of Ethics.
- Code of Ethics and Conduct for Partners, Suppliers and Contractors.
- Sustainability and Stakeholder Engagement Policy

4.2. External

- Federal environmental regulations, such as:
 - General Law of Ecological Balance and Environmental Protection, with its Regulations, Mexican Official Standards, Agreements and other associated standards.
 - National Water Law, with its Regulations, Mexican Official Standards, Agreements and other associated standards.
 - General Law on Climate Change, with its Regulations, Mexican Official Standards, Agreements and other associated standards.
 - General Law for the Prevention and Integral Management of Waste, with its Regulations, Mexican Official Standards, Agreements and other associated standards.
- State and local environmental regulations.
- Paris Agreement and Mexico's Intended Nationally Determined Contributions (NDCs).
- ISO 14001:2015.
- GHG Protocol.
- Recommendations from the Task Force on Climate-related Financial Disclosures (TCFD).
- IFRS S2 Climate-related Disclosures of the IFRS Foundation's ISSB.
- Task Force for Nature-related Financial Disclosures (TNFD) Recommendations
- Post-2020 Global Biodiversity Framework, of the Convention on Biological Diversity (CBD)

5. DEFINITIONS

Term	Description
a. Environmental aspects	Activities carried out by an organization, and the products or services that result from carrying out these tasks, which have the capacity to interact with the environment. This interaction, or impact, can be negative or positive.
b. Biodiversity	The variety of life, the set of all living beings on the planet. It includes diversity among species and among ecosystems. The concept also encompasses how this diversity changes from place to place and over time. It is key to the sustainability of the planet.
c. Global warming	It results from an increase in the greenhouse effect, a process in which thermal radiation emitted by the Earth is trapped in the atmosphere by greenhouse gases (GHGs). The greenhouse effect is necessary to maintain the planet's temperature at habitable levels. However, the emission of GHGs in higher than natural amounts as a result of human activities has caused an uncontrolled increase in this effect, leading to global warming.
d. Climate Change	Long-term changes in temperatures and weather patterns, whether natural or due to human activity. Anthropogenic causes are being the main driver of change, especially the burning of fossil fuels such as coal, oil and gas. Changes in the state of the climate can be identified through changes in the average values and/or in the variability of its properties and considers global warming.
e. Criteria air pollutants	Chemical substances present in the air in sufficiently high concentrations that can harm the health and life of humans, animals, vegetation or objects. Such substances as carbon monoxide (CO), particulate matter (PM), sulfur oxides (SOx), nitrogen oxides (NOx) and ozone (O ₃) or physical conditions such as excessive heat or noise are considered air pollutants.
f. Circular economy	Production and consumption model that involves sharing, renting, reusing, repairing, renewing and recycling existing materials and products as often as possible to create added value.
g. Scenarios	Cases presented in a standardized way at a global level, which allow to calculate the probability of a risk and the magnitude of its consequence in different situations/variables that characterize it. The currently accepted global scenarios use variables such as the concentration of Greenhouse Gases (GHG), their impacts and mitigation possibilities vs. definition of temperature increase and policies and technologies to contain it, respectively.

Term	Description
h. Greenhouse Gases (GHG)	<p>Substances in a gaseous state of natural origin and/or resulting from human activity, which are essential to maintain the planet's temperature through the greenhouse effect; human action has increased their number and altered their natural balance.</p> <p>The United Nations Framework Convention on Climate Change recognizes six: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulfur hexafluoride (SF₆).</p>
i. Net positive impact (biodiversity)	<p>When companies seek, through their actions on biodiversity, not only to avoid net loss, but also to ensure that the increase in biodiversity significantly outweighs the loss that may have occurred or may have occurred.</p>
j. Environment	<p>Space in which life develops; it is comprised by a set of physical, chemical and biological components with which living beings interact.</p>

6. ROLES AND RESPONSIBILITIES

6.1. Board of Directors

- Ratify this policy, assuming the commitment to its implementation, as well as to the continuous improvement of environmental performance, climate change and the impact on nature and biodiversity.
- Ultimately oversee progress in the implementation of the Sustainability Strategy, which includes initiatives related to the different environmental aspects and addressing risks and opportunities related to climate change and nature. Receives quarterly updates on this performance through the Corporate Practices and Sustainability Committee, or directly from the Sustainability Department.
- The Corporate Practices and Sustainability Committee, a delegated body of the Board, quarterly evaluates the plans, objectives, goals, strategies, risks and activities related to the Group's sustainability performance, and reports to the Board of Directors.

6.2. Executive Presidency

- The Executive Presidency, which is also part of the Board and to which the Sustainability Management reports directly, approves in first instance the Sustainability Strategy. It also supervises the progress we are making in Grupo Traxión.

- Approves the execution of extraordinary projects related to the management of environmental aspects, and the attention to risks and opportunities related to climate change and nature.

6.3. General Management

- The General Management establishes the commitment to the environment, climate change and biodiversity through the approval and monitoring of compliance with this policy, as well as the continuous improvement of environmental performance in all business units.

6.4. Corporate Sustainability Department

- Identify requirements and recommendations on environmental, climate and nature-related management issues from the market and Traxión's stakeholders, in order to enrich the strategy and best practices implemented in the Group. Transmit said requirements and recommendations to the relevant corporate areas and business units.
- Coordinate the identification and periodic prioritization of environmental, nature-related and climate change risks, integrating the corporate risk team in the process. We refer to those that could affect the operations of Traxión's business units.
- Estimate Traxión's consolidated GHG emissions for reporting and disclosure to different stakeholders.
- Generate recommendations to Traxión's Executive Presidency and General Management regarding risks and opportunities related to nature, as well as climate change, science-based indicators (SBTi) and GHG emissions offsets.
- Coordinate the implementation of the Sustainability Strategy, comprised by initiatives that correspond to different areas of the company. Call the Sustainability Committee, comprised by all Traxión's corporate management and business units, to coordinate the execution of the Sustainability Strategy throughout the Group, and to identify and analyze opportunities and risks related to environmental, social and governance issues.
- Report to Traxión's Executive Chairman and update the Sustainability Committee, the Corporate Practices and Sustainability Committee, and other corporate governance bodies on the progress of the Sustainability Strategy, including strategic environmental initiatives and projects.
- Collaborate with the different areas and teams of Traxión in response to inquiries from stakeholders regarding the company's performance on

issues related to environmental management, and addressing risks and opportunities related to climate change and nature. Communicate the related performance to stakeholders.

6.5. Corporate Management of Operational Excellence

- Approve and coordinate Traxión's Operational Environmental Management Strategy, which must be implemented in the business units, ensuring that the necessary resources are in place, and that it is aligned with the Sustainability Strategy.
- Monitoring its progress, commingled with the supervision also carried out by the Sustainability Department. Special focus on monitoring indicators related to fuel consumption and performance, in addition to other indicators that integrate its dashboard.
- Promote the implementation of environmental management systems, based on the requirements of ISO 14001:2015, in our business units.
- Provide environmental information for monitoring and reporting purposes to the General Management and the Sustainability Department.

6.6. Corporate Safety and Environment Management

- Define Traxión's Operational Environmental Management Strategy, as well as the relevant guidelines for its implementation in all business units.
- Support business units in the implementation of environmental management systems, based on the requirements of the international standard ISO 14001:2015.
- Establish the environmental objectives and indicators that should govern the business units, which should be focused on compliance herewith and the management of the significant environmental aspects of Traxión and its business units.
- Follow up on the implementation of Traxión's Operational Environmental Management Strategy and environmental management systems in the business units.
- Propose environmental initiatives and programs, aligned with Traxión's Business and Sustainability Strategies, that promote operational efficiencies and optimizations.
- Monitor the compliance of the business units with current environmental regulations.
- Responsible for the disclosure of this policy.

- Collect and consolidate environmental information from the business units, report it to the Operational Excellence Management, and channel it in a timely manner to the Sustainability Department and other relevant areas as needed.
- Report to the Corporate Management of Operational Excellence the progress of the implementation of the Operational Environmental Strategy in the Group and its business units; as well as, propose improvements.
- Promptly report any circumstance that may trigger water, air, soil, natural resource contamination events or present any risk to the health of living beings and communities near the operations of the Group's business units.
- Inform the relevant authorities and support in the management and coordination of the response and resolution of events of the nature described in the previous section.

6.7. General Directors of the Business Units

- Maximum responsible for the environmental management system of the business unit, based on the requirements of the international standard ISO 14001:2015.
- Ensure compliance with applicable Federal, State and local environmental legal requirements applicable to its business unit.
- Approve the goals of the environmental indicators of its business unit, and follow up on its compliance, performance and continuous improvement.
- Report the performance of environmental indicators to Traxión's General Management, either directly or through the Operational Excellence Department.
- Provide the necessary activity information for carrying out the calculation of the company's GHG emissions.
- Promptly report any circumstance that may trigger water, air, soil, natural resource contamination events or present any risk to the health of living beings and communities near the business unit's operations.
- Inform the relevant authorities and manage the response and resolution of events of the nature described in the previous section.

6.8. Persons Responsible for Environmental Management of Business Units

- Implement the Operational Environmental Management Strategy approved by the Corporate Director of Operational Excellence.
- Lead the implementation of the business unit's environmental management system based on ISO 14001:2015 requirements.
- To comply with current and applicable Federal, State and local environmental requirements.
- Monitor the applicable environmental aspects of the business unit, as well as the associated environmental management indicators (water and electric power consumption, waste management, wastewater, atmospheric emissions, among others).
- Support in the definition of the goals of the environmental indicators of the business unit.
- Implement and monitor environmental initiatives, programs and projects established by Traxión Corporate.
- Propose improvements and work as a team with other business unit teams for implementation.
- Collaborate with Traxión's Corporate Safety and Environmental Management in disseminating this Policy.
- Channel environmental information and indicators, as well as the results of the implementation of initiatives, programs and projects to the Corporate Safety and Environment Management and to the Corporate Sustainability Department of Traxión.
- Report progress in the implementation of the Operational Environmental Strategy and the performance of environmental indicators to the General Management of the Business Unit.
- Promptly report any circumstance that may trigger water, air, soil, natural resource contamination events or present any risk to the health of living beings and communities near the business unit's operations.
- Inform the relevant authorities, manage and coordinate the response and resolution of events of the nature described in the previous section.

6.9. Operational Excellence in the Business Units Managers

- Validate fuel efficiency/performance indicators.

- Support the implementation of environmental projects and programs and those related to improving fuel efficiency.

6.10. Business Unit Fuels Area Managers

- Monitor the consumption and performance/efficiency of fuels used in the different operations and activities.
- Define measures focused on improving the performance of fuels used in vehicles. Support the relevant areas for the implementation and monitoring of said measures.

6.11. Employees

- Compliance herewith and Traxión's environmental procedures and guidelines.
- Compliance with the environmental procedures and guidelines of its business unit.
- Actively participate in the business unit's environmental management system and implement environmental controls associated with its activities.
- Compliance with the environmental legal requirements applicable to its activities and operation.
- Implement good environmental practices during the development of its activities.
- Actively participate in programs, campaigns and training developed by the business unit or Traxión Corporate.
- Promptly report any circumstance that may trigger water, air, soil, natural resource contamination events or present any risk to the health of living beings and communities near the business unit's operations.
- Support in the resolution of events of the nature described in the previous section.

7. POLICY

At Grupo Traxión S.A.B. de C.V., including our subsidiaries and affiliates, we are committed to the protection of the environment, nature and biodiversity. We work on the prevention and minimization of pollution generated by our activities, as well as on the proactive identification of risks related to nature and climate change, in order to establish the corresponding prevention and mitigation measures, and to address the business opportunities associated with responsible practice.

In alignment with the strategic direction of our organization, we focus on the continuous improvement of our systems, processes and operations, monitoring the performance of our environmental objectives, complying with environmental and other applicable legal requirements, and addressing the risks and opportunities of our environment in terms of the environment, climate change, and impact on nature and biodiversity. In order to meet the needs of our stakeholders.

We always seek to have competent equipment and the highest technology, which allow compliance with the guidelines established in this policy and the adoption of the best practices in environmental management, climate change and impact on nature and biodiversity. Therefore, we are committed to:

1. Implement actions that promote the preservation and care of the environment, nature, and biodiversity.
2. To evaluate and minimize the environmental impact in those areas that are strategic for Traxión.
3. To guarantee the control of our processes, services and operations through an internal culture based on continuous improvement, promoting the sustainable use of resources.
4. Comply with legal requirements in environmental, climate change, and impact on nature and biodiversity.
5. Adopt the best national and international practices in environmental, climate change, and impact on nature and biodiversity, evaluating their incorporation according to their feasibility and relevance in our strategies and operations.
6. Promote the principles of environmental responsibility, climate change, and impact on nature and biodiversity, waste prevention and management, the substitution of inputs for less polluting alternatives, the reduction of our dependence on fossil fuels, the adoption of renewable and clean energies, among others, with the aim of achieving sustainable and socially responsible economic growth, environment, nature and biodiversity.

8. GENERAL GUIDELINES

8.1. Environmental Aspects Management

Our business units and corporate areas must:

- Comply with all Federal, State and local environmental legal requirements applicable to its main and secondary activities and operations.
- Implement, maintain and monitor environmental controls to prevent and minimize the generation of its environmental aspects.
- Measure the progress of its environmental performance through relevant indicators.

8.1.1. Water management

Our business units and relevant corporate areas must:

- Comply with current and applicable Federal, State and local regulations regarding wastewater discharge.
- Implement a comprehensive water management program that includes measures aimed at monitoring the consumption and final disposal of the resource, promoting best practices in water conservation among employees and operations.
- Seek the implementation of rainwater harvesting systems and/or reuse of treated wastewater on site for use in activities that do not require potable water, to the extent possible and when economically feasible.
- Establish the necessary measures and investments that allow for a progressive reduction in the intensity of water consumption, that is, the difference between what is captured and what is discharged. Similarly, to reduce the need to capture water from primary sources, enabling its reuse post-operationally.

8.1.2. Electric power management

Our business units and relevant corporate areas must:

- Implement a comprehensive energy management program, that contemplates monitoring and use of energy efficient resources in the business units operations.

- Include in the program, the maintenance of equipment and machinery of all the facilities, ensuring their optimal operation and prolonging their lifespan.
- Establish energy efficiency initiatives that are economically viable and effectively reduce energy consumption, making the necessary investments to achieve a gradual and significant reduction in energy consumption intensity..
- Consume electric power from renewable or clean sources to the extent that this is economically feasible. It can be generated in the same facilities of the business unit (e.g. solar panels) or acquired from third parties.

8.1.3. Fuel management

Fossil fuels are the input that has the largest contribution to our scope 1 greenhouse gas inventory; therefore, our business units and relevant corporate areas must:

- Constantly monitor the consumption, quality, performance and efficiency of the fuels used.
- Comply with preventive and corrective maintenance programs.
- Renew the fleet as needed.
- Constantly train and train operators in eco-efficient management and monitor their driving habits.
- Organize and optimize routes in order to travel fewer kilometers and reduce empty kilometers.
- Conduct tests on engines, new technologies, renewable energies, and alternative fuels with a lower impact on climate change and the environment.

8.1.4. Renewable Energies

As part of our commitment to mitigate our impact on global warming, we are committed to increasing the use of renewable energy in our operations and business segments, in accordance with the market availability and economic viability of the relevant technologies.

8.1.5. Circular economy and waste management

Our business units and relevant corporate areas must:

- Implement a comprehensive waste management program that complies with current and applicable federal, state, and local regulations on waste management and includes the following aspects:

- Weigh and quantify the waste generated, hazardous and non-hazardous.
- Hire external waste management suppliers that have the respective authorizations and follow up on the final destinations of the waste that is delivered to them.
- Establish the necessary measures and investments that allow a progressive reduction in the intensity of waste generated.
- Promote the reuse of tires whenever possible for their safety guarantee.
- Seek the implementation of economically viable processes with input suppliers to reduce the packaging of their products or their change for reusable materials.
- Seek the implementation of economically viable initiatives that allow the reduction of waste generated by customers, which is from the services provided by Traxión.

8.1.6. GHG emissions management

- We are committed to carrying out an annual inventory of Scope 1 (direct emissions from the company's own sources) and Scope 2 (indirect emissions associated with purchased electricity generation) GHG emissions in accordance with the methodology outlined by the GHG Protocol Corporate Accounting and Reporting Standard.
- In order to deepen the scope of this inventory, progress will be made in integrating the calculation of scope 3 GHG emissions (indirect emissions related to value chain activities).
- We will evaluate the setting of GHG emission reduction targets applying the Science Based Targets (SBTi) methodology; as well as pathways to be carbon neutral, integrating GHG emission reduction measures with the offsetting of remaining emissions.
- We are evaluating the establishment of an internal carbon price as an effective tool to incentivize emissions reductions.

8.1.7. Other environmental aspects

Our business units and relevant corporate areas must:

- Implement, maintain and monitor processes, procedures and internal control measures to reduce emissions of gases, including refrigerants and particulates, other than greenhouse gases, into the air.
- Establish measures to control environmental noise emissions.
- Comply with current regulations will always be the basis on which we will make additional efforts.

8.2. Climate Risk Management

We are committed to:

- Identify, prioritize and proactively address the risks associated with climate change through prevention and mitigation measures, as well as to take advantage of the operational and business opportunities that may arise.
- Use the nomenclature established by the *Task Force on Climate-related Financial Disclosures* (TCFD), adopted by the *International Sustainability Standards Board* (ISSB) of the *IFRS Foundation*, in its IFRS S2 standard, for the analysis of physical risks and transition risks.
- Apply internationally recognized scenarios, which allow dimensioning the significance of risks and opportunities for Traxión's activities and business.
- Include Traxión's activities and those of its value chain in the analysis, in order to be able to integrate those who are part of the value chain (e.g. clients) in the initiatives.
- With respect to climate risks, we will propose an adaptation plan for existing operations, which can be updated in line with the evolution of our operations, including organic and inorganic development.
- Deepen the financial dimensioning of climate change risks and opportunities. Opportunities include initiatives to mitigate emissions in own operations and in the value chain, leading to increased revenues and/or reduced operating and financial costs (e.g. financing or insurance).

8.3. Management of risks related to nature and biodiversity

At Traxión, we carry out mobility and logistics activities using the available public infrastructure to move power units and operate warehouses in environments compatible with our operations. However, we are aware of the vital importance of biodiversity and the interrelationships between species and their environment for planetary survival and long-term sustainable economic development.

- We conducted an analysis of risks and dependencies associated with nature and biodiversity, assessing how Traxión's activities may impact and depend on nature over time, which could lead to vulnerabilities in our financial results.

- We will heed international recommendations, such as the Task Force on Nature-related Financial Disclosures (TNFD) and assess the feasibility of assigning monetary value to natural resources and ecosystem services for better management and informed decision-making.

8.4. Safeguarding biodiversity

We are committed to operating responsibly, safeguarding the integrity of the environment and species. This considers both our direct operations and those of our suppliers, to whom we introduce requirements as part of the selection processes, including the requirement of no deforestation.

- We will identify potential direct impacts, such as collisions with wildlife in operations and chemical spills, to seek mitigation strategies.
- We will avoid the net loss of species as a result of our activity and that of our supply chain by applying a mitigation activity hierarchy.
- We will strengthen the identification of the risks and impacts associated with our activity, as already indicated in section 8.3, and fine-tune the impact of mitigation actions. The establishment of indicators and their monitoring, integrated into the Sustainability Strategy and the annual comprehensive risk management plan, will be key.

8.5. Collaboration with our stakeholders

We are committed to our stakeholders, especially our employees, suppliers, customers and business partners to:

- Promote the development and implementation of guidelines, programs, training, and actions that allow them to manage their operations in a responsible manner with the environment, climate change, nature, and biodiversity; continuously improve their performance, mitigate their impacts and generate environmental awareness in these areas.
- Maintain a channel of dialogue to share good practices in environmental management, climate change and impact on nature and biodiversity; and seek alignment with water management and integrated waste management programs.
- Establish joint commitments for the implementation of actions aimed at the sustainable use of resources, reduce the generation of emissions and

waste, reduce the contribution to climate change, carry out initiatives related to the circular economy and protect nature and biodiversity.

- Explore opportunities to establish strategic alliances with organizations, institutions, and communities to promote initiatives on the environment, climate change, and impact on nature and biodiversity, which generate a positive and sustainable impact.

8.6. Evaluation and continuous improvement

At Traxión, we are committed to implementing a robust process of evaluation and continuous improvement in our environmental, climate change and impact on nature and biodiversity management. To this end, we establish the following guidelines:

8.6.1. Periodic Evaluation

- We will carry out periodic evaluations of our management practices and associated risks, considering international standards, current regulations and scientific advances.
- We will use key performance indicators to measure our progress and set clear, measurable targets.

8.6.2. Identification of opportunities for improvement

- We will analyze the results obtained from the evaluations to identify areas of opportunity and establish corrective and preventive actions, prioritizing those that generate the greatest positive impact.
- We will encourage feedback from different hierarchical levels, employees and stakeholders to obtain diverse perspectives and enrich our continuous improvement approach.

8.6.3. Implementation of improvement actions

- We will develop specific action plans based on the findings of the assessments, assigning clear responsibilities and timelines for their implementation.
- We will constantly seek opportunities for innovation in our practices, adopting advanced technologies and methodologies, and encouraging continuous learning among our teams.

8.6.4. Monitoring and Follow-up

- We will establish regular monitoring and follow-up systems to assess the progress of the actions implemented and adjust them as necessary.
- We will generate periodic reports that reflect our performance, transparently communicating our achievements, challenges and corrective actions taken.

8.6.5. Adaptability and Flexibility

- We will be prepared to adapt to external changes, reviewing our strategy and adjusting our practices in the face of new regulations, technological advances or relevant scientific discoveries.
- We will maintain flexibility in the implementation of improvements, considering the diversity of operational contexts in the different business units.

9. SANCTIONS

Traxión employees who fail to comply herewith shall be subject to disciplinary measures as determined by Traxión and/or business unit management, which, depending on the severity, may be as follows:

1. Warning call.
2. Issuance of administrative record.
3. Suspension from work without pay.
4. Termination of employment agreement.
5. Criminal complaint or appropriate legal action.

In the event of non-compliance by authorized third parties that provide a good, service or have any type of interaction with Traxión and its business units, the disciplinary measures that the management of Traxión and/or its business units consider appropriate in each case shall be applied, which may range from the imposition of economic sanctions, temporary or definitive bans and the relevant legal actions.

10. LIABILITY / OWNERSHIP

The areas titleholders of this policy and primarily responsible for its content, updating and requesting approval from the following areas Traxión's General Management are Sustainability Management and Operational Excellence

Management, through the Corporate Management of Industrial Safety and Environment.

10.1. Approval

This policy was approved by the Company's Board of Directors at its meeting on July 19, 2024.

11. APPENDICES

- Not applicable