

TRAXIÓN

LIFE IN MOTION

**SUSTAINABILITY AND
STAKEHOLDER
ENGAGEMENT POLICY
GRUPO TRAXIÓN, S.A.B.
DE C.V.**

July 2024

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1. INTRODUCTION

At Grupo Traxión S.A.B. de C.V. (“Traxión”) we provide integral solutions and services in mobility and logistics that are innovative, of high quality and that incorporate sustainability criteria to address the related environmental and/or social impacts.

We develop our team and integrate technology to maximize efficiency and effectiveness in meeting the needs of our different clients.

The policy is articulated in accordance with our current Sustainability Strategy.

2. OBJECTIVE

To establish Traxión’s general guidelines for integrating environmental, social and corporate governance (ESG) factors into our business model approach, operation and investment decisions.

The policy addresses issues that are relevant to the impacts that our activities generate on the different stakeholders (impact materiality), as well as those that are especially critical for cash flow, the value of the estate and access to capital (financial materiality).

This policy seeks to guide our relations with our stakeholders, promoting the application of the international agreements and guidelines to which we subscribe, in areas such as reduction of our contribution to climate change, due diligence in human rights, good labor practices, among others.

Thus, at Traxión we work proactively on the related risks and impacts, and on the opportunities, reinforcing the stability and development of the company over time, and generating value for all our stakeholders.

3. SCOPE

This policy applies to all companies, affiliates and subsidiaries of Traxión and is mandatory for all officers, directors and employees of the company, as well as for third parties that have a contractual relationship with the company.

4. REFERENCES

As an institution, our performance at all times conforms with the legal and regulatory provisions that apply to us.

We also consider as a reference different agreements and voluntary guidelines. For this purpose, we propose the present sustainability policy, Furthermore, a series of other related codes, policies and procedures.

The main references considered are presented below.

4.1. Internal

- Code of Ethics
- Code of Ethics and Conduct for Partners, Suppliers and Contractors
- Anti-Corruption and Integrity Policy
- Compliance Policy
- Environmental, Climate Change and Biodiversity Policy
- Protocol and Policy to Prevent Discrimination, Violence, Workplace Harassment, Sexual Harassment, Forced and Child Labor, and Psychosocial Risks
- Other policies and codes, available in the Integrity section of our website.

4.2. External

- 2030 Agenda and Sustainable Development Goals (SDGs) of the United Nations (2015)
- Principles of the United Nations Global Compact (2000)
- Paris Agreement to keep global warming below 2°C, (2015)
- ISO 37001:2016 – Anti-Corruption Management System
- ISO 19600:2014 – Tax Compliance Management System and AML currently 37301
- ISO 9001:2015 – Quality Management System
- ISO 14001:2015 – Environmental Management System
- ISO 27001:2013 Information Security Management System
- Likewise, consider the guidelines associated with the ISO management standards that we apply in our operations.

5. DEFINITIONS

Term	Description
a. ESG	Refers to the environmental, social and governance aspects that, when integrated into the strategy and operation of the business, promote the creation of shared value and sustainable development.
b. Value chain	A complete sequence of activities upstream (stakeholders providing value: suppliers, contractors and others) or downstream (stakeholders receiving value: clients and other

Term	Description
	users) that materialize in the form of products or services purchased or sold by the company.
c. Climate change	<p>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.</p> <p>Changes in the state of the climate can be identified through changes in the average values and/or in the variability of its properties. It includes global warming.</p>
d. Sustainable development	According to the United Nations, it is defined as meeting “the needs of the current generation without compromising the capacity of future generations to meet their own needs”. This requires an effort to innovate and apply best practices in environmental, social and economic matters to ensure the well-being and development of the company and the business.
e. Human Rights	Those rights inherent to all human beings, without distinction of any condition; the universality is established from international law, to which is added its integration in national regulations and in guidelines of companies and social organizations.
f. Discrimination	Actions of distinction, exclusion and restriction that with or without intention are carried out based on intolerance, rejection and ignorance and that result in hindering, belittling and restricting the value, equality and recognition of a person’s human rights, all due to individual differences and characteristics.
g. Diversity	It is a value that recognizes the originality and plurality of identities within a group and the value they bring to the whole.
h. Energy efficiency	Activities aimed at improving the rational use of energy sources to protect the environment while meeting the needs of goods and services required by the company.
i. Corporate governance	A set of rules and principles that defines the structures and processes, namely, the relationships between the company’s governing bodies, as well as with its stakeholders for the generation of value in decision-making.
j. Stakeholders	Any group or individual that can affect or is affected by the organization’s operations.
k. Integrated Report	A public document that presents the company’s economic, environmental, social and governance performance of the organization.

Term	Description
l. Impact materiality	Those socio-environmental issues relevant to the impact that the company's activities have on its stakeholders.
m. Financial materiality	Those socio-environmental issues that are relevant in terms of how they condition financial results, stability, the company's balance sheet and access to funding.
n. Sustainability	Objective of the organizations linked to environmental, social and economic performance, together with corporate governance, that contributes to social development and respects the environment, guaranteeing the availability of resources.
o. Related third parties	Suppliers and subcontractors that have a service agreement with the company.

6. ROLES AND RESPONSIBILITIES

6.1. Executive Presidency and General Management

Compliance with the policy is the responsibility of the Executive Presidency and the General Management, with the support of the Sustainability Department.

Among the main duties of the Executive Presidency and the General Management in this area are:

- To participate in the management of the Sustainability Strategy: approve the same, including the medium-term sustainability objectives established by Traxión.
- To follow up on the management of key issues related to impact materiality and financial materiality.
- To review the main management results related to material issues, whether environmental, social or governance (ESG).
- To authorize social and environmental investments that promote compliance with the organization's strategic sustainability objectives.
- To promote the experience of the culture of sustainability and close dialogue with the different stakeholders, including the application of the guidelines established herein.

6.2. Corporate Sustainability Department

- Follow up on the implementation hereof by employees.
- Design, develop and implement the sustainability strategy with other relevant external and internal Traxión stakeholders.
- Coordinate and monitor the execution of the Sustainability Strategy, its initiatives and derived action plans, by the different areas and employees involved, especially those appointed to lead initiatives.
- Evaluate the results and, when applicable, the impact of Traxión's sustainability initiatives and the fulfillment of the relevant objectives.
- Prepare periodic reports with information on the results achieved in social, environmental and corporate governance matters.
- Facilitate Traxión's transparency on its ESG performance.
- Contribute to the generation of sustainability content to be disseminated in training programs and awareness campaigns of Traxión's specialized areas and companies.
- Collaborate in the identification of external and internal stakeholders relevant to Traxión, and in engagement with them. Promote the creating of a dialogue instance and the achievement of agreements.
- Promote linkages with key stakeholders that drive Traxión's sustainability objectives, including partnerships.

6.3. Corporate Communications and Institutional Relations Department

- Facilitate external communication of Traxión's ESG performance, participating in the development of the integrated report led by the Sustainability Department, as well as developing other complementary materials as required.
- Collaborate in engagement with external and internal stakeholders relevant to Traxión.

6.4. Corporate Investor Relations Department

- Collaborate in engagement with external and internal stakeholders relevant to Traxión, especially investors.
- Communicate to investors and other financial market players (e.g. risk rating agencies), Traxión's progress on ESG factors, especially on financial material issues.
- Facilitate external communication of Traxión's ESG performance, participating in the development of the integrated report led by the

Sustainability Department, as well as developing other complementary materials as required.

6.5. Corporate departments of the Business Units

The corporate areas such as human capital, legal, finance, accounting, commercial, marketing, controllership, auditing, continuous improvement, innovation, information technology, as well as the administrative and operational teams in Traxión's business units are responsible for compliance with the policies, processes, plans, procedures, projects and other aspects related to environmental, social and corporate governance issues included in Traxión's Sustainability Strategy.

Its main activities include:

- Participate in the design and update of the Sustainability Strategy, including the processes for determining material issues.
- Perform in accordance with Traxión's self-regulation, including this Policy, and actively promote this with all employees in their teams.
- Actively promote the implementation of the initiatives and projects of the Sustainability Strategy, as well as the availability of the necessary data for their monitoring.
- Ensure that policies, processes, regulations and operating procedures comply with the provisions adopted in standards and good practices adopted by Traxión in sustainability matters.
- Include in training programs content related to environmental, social and governance issues in accordance with the material issues and the Group's Sustainability Strategy.
- Propose complementary environmental, social and governance initiatives and programs to address emerging risks and opportunities as they are identified, which will undergo a process of internal validation by the Sustainability Department and the governing bodies.

6.6. Employees

Traxión's employees are required to conduct themselves in accordance herewith in their different decisions, as well as with the rest of the established policies, codes and procedures.

7. GENERAL GUIDELINES

7.1. Regarding the definition of sustainability priorities

At Traxión, we have set ourselves the task of determining material issues every three years, always integrating impact and financial materiality.

Furthermore, the material topics will be the basis for updating the priorities to be addressed in our Sustainability Strategy and will also be used to select the contents of the integrated report, i.e. the indicators of the international standards to be used (e.g. Global Reporting Initiative - GRI-, Sustainability Accounting Standards Board -SASB-).

Likewise, the materiality process and risk management are closely related. The materiality result will be an input for updating corporate risk maps and prevention and mitigation plans.

The materiality process will involve the company's internal and external stakeholders in a participatory process. The results will be reviewed by an independent third party; submitted and validated by the Executive Presidency and the Corporate Practices and Sustainability Committee, a delegated body of the Board of Directors.

7.2. Transversal

- As a company, we define work priorities based on material issues and focus on them.
- We organize priorities in the fields of Governance, Planet (for environmental performance), People (for social performance) and Profitability (for business profitability and the value of considering environmental and social criteria in the design of products and services).
- We promote a culture of sustainability in the company, based on our mission, vision and values.
- We always aim to perform in accordance with international best practices in the different material issues.
- The internal decisions of employees and collegiate bodies should consider maximizing positive and reducing negative impacts, as well as generating integral value for all stakeholders.
- We extend our commitment to sustainability to external stakeholders in our value chain (e.g. suppliers, clients).
- We actively involve our stakeholders in the operation, including in the implementation of the most sustainability-related measures.
- We seek with all our efforts to contribute to the achievement of the UN Sustainable Development Goals (SDGs), as well as the Paris Agreement to limit global warming to below 2°C.
- We are transparent about our performance, including ESG (environmental, social and governance) factors related to material issues. In this way, we provide access to information that we seek to be relevant in time and scope. We also aim to use international reference standards.

- We are committed to always perform within the framework of the laws that apply to us; this is a mandatory requirement for all employees and directors.
- We always seek to achieve the satisfaction of our clients and the rest of our stakeholders by complying with our contractual, legal, regulatory and normative obligations.

7.3. Governance

- The corporate governance structure is designed and updated with the objective of promoting and facilitating decision-making that addresses the interests of the different parties. This facilitates continuity and success over time, despite changes in the operating context.
- We nurture risk analysis and prioritization, integrating risks closely related to environmental and social issues. In this way, we reinforce the safeguarding of the company's estate and the confidence of our stakeholders.
- With all of the above, we ensure the proper monitoring of the Sustainability Strategy and the inclusion of ESG criteria in decision making and in the company's culture.
- We train and sensitize the Board of Directors and Senior Management, addressing emerging issues related to sustainability, so that they can incorporate it as part of their leadership and management.
- We demand ethical performance from our employees and members of the Board of Directors, based on integrity and the protection of the company's interests.
- We promote adherence to our ethical guidelines by our employees; Furthermore, in our value chain (e.g. suppliers, clients).

7.4. People

7.4.1. Human capital

- We promote a culture of respect and inclusion, avoiding discriminatory practices and ensuring that our employees can live their diversity.
- We understand diversity as a value for the company, which enriches our work environment, decision-making, the understanding of our different stakeholders and, consequently, our competitiveness.
- We offer opportunities for professional growth and development, facilitating training and carrying out institutionalized performance evaluations with clear criteria.

- We strive to provide adequate infrastructure and conditions for the exercise of each employee's activity, including accessibility conditions and the technology required.
- We promote the well-being of our employees through optimal working conditions and remuneration.
- We protect the health and integrity of our employees, with occupational health and safety measures, medical support and other health benefits, also promoting self-care and a culture of prevention.

7.4.2. Community

- We attend to social and environmental needs in our surroundings as part of our corporate citizenship, seeking to be good neighbors.
- We delegate to the Traxión Foundation and its selected partners, the design and implementation of social and environmental initiatives in the communities that complement the Group's Sustainability Strategy.
- The Traxión Foundation is committed to act as the main social arm of Traxión and contribute to sustainable development with innovative and high impact programs for the benefit of vulnerable groups.
- We promote the active participation of our employees in actions of Traxión's business units and the Foundation that have a social or environmental purpose.

7.5. Planet

- We work proactively to reduce the organization's negative environmental impacts through the environmental management of our operations.
- We promote energy efficiency, especially through the use of higher quality fuel and the close monitoring and maximization of its performance. Furthermore, we promote eco-efficient and responsible management by unit operators.
- We are committed to renewing our fleet on a regular basis and carrying out comprehensive maintenance to ensure that the units operate in optimal condition.
- Likewise, we seek opportunities for the use of transportation technologies and fuels that emit less greenhouse gases (GHG) and the generation of electricity from renewable sources.
- With the above paragraphs, we seek to mitigate our contribution to climate change, especially by exploring economically viable alternatives for fleet and operational decarbonization.

- We adopt circularity models for the use of waste and tires; we also work from the efficiency in the use of inputs, e.g. with the periodic maintenance of the units already established.
- We are strongly committed to safeguarding biodiversity, including requirements and promotion of best practices in our value chain.

7.6. Profits

7.6.1. Infrastructure, innovation and technology

- We promote the internal development of knowledge, by having the best talent, as well as professional careers that provide a rich experience to our employees.
- The Traxión Management Model defines and develops our way of operating, as an integration of human and technological capacities, allowing us to improve decision-making thanks to the standardization and optimization of business processes, as well as the control, timeliness and quality of information.
- We integrate technology to facilitate the efficiency and quality of the service provided to our clients.
- We encourage the continuous improvement of our processes and technology, in accordance with the highest quality standards and best practices.
- We go beyond operational improvement, designing innovative products and services that are born digital and asset light business models.
- We seek to ensure that innovation processes are agile and meet the needs of each business segment, through specialized innovation and technology teams.
- We have a large-scale and diverse installed capacity that allows us to quickly meet the needs of the market and respond to changes in the demand for services by sector and type.

7.6.2. Products and services

- We work with suppliers that offer a high level of experience and quality to guarantee the quality of our services to our clients.
- We promote ethical guidelines and the integration of ESG (environmental, social and governance) aspects in the supply chain.
- We manage the risks and opportunities of our activities in order to prevent harm to people, property and the environment.
- We conducted an assessment to identify our significant suppliers, considering risks to the continuity of operations, ESG impact risks, specific

risks related to the country and sector in which they operate, as well as the commodities they provide to us.

7.6.3. Operating and financial results

- We are maintaining the company's growth and profitability, with a long-term vision and a responsible approach to the use of resources.
- Diversification is a fundamental part of our business model, which allows us to be resilient to macroeconomic cycles and changes in market trends. In addition, we aim for the majority of our contracting to be long-term.
- We maintain a high level of financial discipline and prudent use of leverage to keep debt levels healthy and ensure access to resources.

7.7. Stakeholders Engagement

Traxión's facilities are located in industrial areas far from vulnerable local communities, and our power units drive on authorized local and federal public roads. In this context, we do not consider that our operations generate adverse environmental and/or social impacts on local communities, and consequently, they are not a priority stakeholder for Traxión. However, our goal is always to establish and maintain a strong relationship with our various Stakeholders, which is why:

- We identify our stakeholders based on different variables according to the methodological decisions made; they are prioritized preferably by evaluating their dependence and influence. We periodically update them, as well as the priority they have and the main interlocutors in the company in charge of the relationship with each one of them.
- The relationship with the different stakeholders by our employees or third parties acting on behalf of Traxión, will be guided at all times by our Code of Ethics and the rest of the policies, codes and procedures that apply in each case.
- The internal managers identified in each case will be in charge of the relationship, in coordination with the Sustainability Department.
- The choice of channels and mechanisms for dialogue will take into account criteria of efficiency in the use of resources, but also suitability for communication. For example, regarding the relevance of technology, timing, language, etc. The short, medium and long term validity will be sought.
- Each person responsible for engagement and the sustainability team as a coordination point for Traxión as a whole are attentive to the evolution of the relationship, attending early to any difficulties that may arise and

seeking to identify and address risks, as well as opportunities, in a preventive manner.

- In the dialogue it is always important that both parties, Traxión and the internal and external stakeholders, are clear about the objective of the dialogue (e.g. agenda of issues to be addressed).
- If required, stakeholders will be provided with the necessary prior information so that they can actively participate in the dialogue.
- The results of the dialogue and engagement are communicated internally in the instances related to the Sustainability Strategy, risk management and in specific working groups that may arise (e.g. in strategic projects, such as the launch of a new business model).

8. SANCTIONS

Traxión employees who fail to comply herewith will 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 assumption 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.

9. LIABILITY / OWNERSHIP

The Sustainability Department is the assigned titleholder hereof and is the main responsible for its content, updating and request for approval by Traxión's General Management.

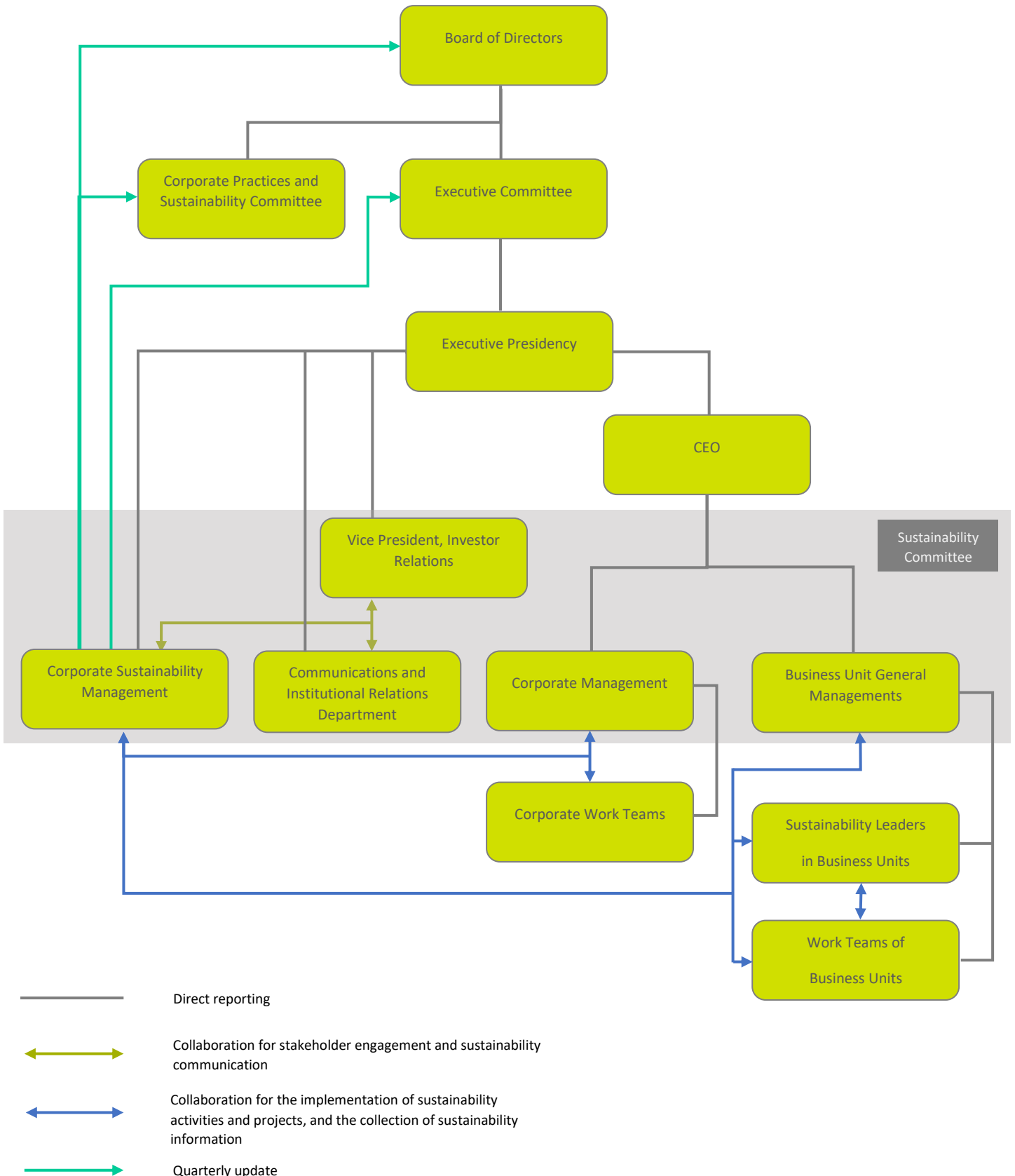
9.1. Approval

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

10. APPENDICES

- Appendix 1: Sustainability Organizational Chart

Appendix 1: Sustainability Organizational Chart



Sustainability and Stakeholder Engagement Policy Grupo Traxión

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