

**cirion**

**Committed  
to responsible  
growth**



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# 1. INTRODUCTION

- Message from the CEO
- About this report
- About Cirion Technologies

GRI 2-22

## 1.1 CEO Letter



### Dear Stakeholders,

I am proud to present Cirion's second annual ESG report, which reflects our continued commitment to sustainability, ethical governance, and positive social impact. Building on the foundations laid in our first report, we have made significant progress in key areas, demonstrating our dedication to integrating sustainability across all facets of our operations.

### A notable highlight this year is the 17% reduction of our carbon footprint.

Through strategic investments in renewable energy and the optimization of our telecommunications nodes and Data Centers, we have reduced emissions and energy consumption, positioning Cirion as a leader in environmental stewardship within the technology sector. We are proud to report that our use of renewable energy increased from 40% to 62% compared to 2022, further reinforcing our commitment to sustainability. These achievements underscore our long-term vision of driving sustainable growth while meeting the evolving needs of our customers.

**While we have made significant progress in reducing emissions, we recognize the importance of continuing this momentum.** We are actively working to define our decarbonization roadmap and set a target that is aligned with the global climate goals. This target will not only help us reduce our own impact, but also encourage our suppliers to lower their targets. This year, we calculated our Scope 3 baseline, which includes our entire value chain.

**We are also proud of the advancements made in promoting diversity, equity, and inclusion across our workforce.** We believe that a diverse and inclusive culture fosters innovation and enables us to deliver better outcomes for our customers and communities. Initiatives such as our mentorship programs and leadership development workshops have empowered underrepresented groups and strengthened our commitment to ensuring equal opportunities for all employees.

### At the heart of Cirion is our unwavering commitment to ethics and integrity.

Our corporate values guide our decision-making processes, ensuring that we operate transparently and responsibly. Our compliance and anti-corruption programs, coupled with our robust governance structures, reaffirm our dedication to maintaining the highest ethical standards.

As we continue this journey, we are more committed than ever to advancing our sustainability goals, upholding our corporate values, and delivering value to our stakeholders. **Together, we are building a future that is not only innovative but also environmentally and socially responsible.**

**Thank you for your trust and continued support as we forge ahead in making a lasting positive impact.**



*While we have made significant progress in reducing emissions, we recognize the importance of continuing this momentum.*

Sincerely,

**Facundo Castro**

CEO Cirion Technologies

GRI 2-2; 2-3

## 1.2 About this report

**We present our Second Annual Sustainability Report, covering the period from January 1 to December 31, 2023, in alignment with the standards of the Global Reporting Initiative (GRI).**

This report aims to provide a transparent and detailed view of our operations and their environmental and social impact, focusing on critical areas such as efficiency in the use of natural resources, responsible e-waste management and commitment to the protection of human rights throughout our global supply chain. By disclosing this information, we strive to provide our customers, business partners, investors, and other stakeholders with a solid basis for evaluating our commitment and progress on sustainability. With this approach, we reaffirm our goal to lead the way towards a more sustainable, ethical and responsible technology industry, thereby facilitating conscious decision-making and promoting a greener and fairer future for all.

**The information contained herein includes the consolidated and audited financial statements as of December 2023.**

**For questions, suggestions or more information, please contact us at: [esg\\_group@ciriontechnologies.com](mailto:esg_group@ciriontechnologies.com)**

**Date published: December 2024**

### ENTITIES INCLUDED IN THIS SUSTAINABILITY REPORT

<b>CIRION ST. CROIX, INC.</b>	801 Brickell Avenue, Suite 2400, Miami-Florida, 33131, USA.
<b>CIRION TECHNOLOGIES ARGENTINA S.A.</b>	Alfárez Pareja 256, Buenos Aires, Argentina.
<b>CIRION TECHNOLOGIES ARGENTINA S.A.</b>	Sucursal Uruguay Juncal,1392 – Montevideo, Uruguay.
<b>CIRION TECHNOLOGIES CHILE S.A.</b>	Av. Kennedy 5735 oficina 802 Edificio Marriott Torre Poniente, Los Condes, Santiago de Chile, Chile.
<b>CIRION TECHNOLOGIES COLOMBIA S.A.S.</b>	Calle 185 No. 45-03 CC Santafé, Torre Empresarial, Oficinas 401 y 501. Bogotá, Colombia.
<b>CIRION TECHNOLOGIES COSTA RICA S.R.L.</b>	Plaza Roble Las Terrazas, Oficina 518 Cantón, Escazú, San Rafael, CP 10203, San José, Costa Rica.
<b>CIRION TECHNOLOGIES DO BRASIL LTDA.</b>	Av. Eid Mansur, 666, Parque São George, Cotia (SP). Brasil.
<b>CIRION TECHNOLOGIES ECUADOR S.A.</b>	Calle Juan Diaz Nro. 37-111, Urbanización Iñaquito, Alto Quito, Ecuador.
<b>CIRION TECHNOLOGIES MÉXICO, S. DE R.L.</b>	Lago Zürich Nro. 96, Col. Ampliación Granada, Miguel Hidalgo, México DF. México.
<b>CIRION TECHNOLOGIES PANAMÁ INC.</b>	Avenida Arnulfo Arias y Calle Ramón Levy Balboa, Edificio Nro. 851. Panamá City, Panamá.
<b>CIRION TECHNOLOGIES PERÚ S.A.</b>	Avenida Manuel Olgúin 395, Urb. Los Granados, Santiago de Surco, Lima, Perú.
<b>CIRION TECHNOLOGIES S.A.</b>	Calle 7, Zona 1, Manzana B-2 Sector Sur, Edificio Impsat, La Urbina, Caracas, Venezuela.
<b>CIRION TECHNOLOGIES SOLUTIONS, LLC</b>	801 Brickell Avenue, Suite 2400, Miami-Florida, 33131, USA.
<b>CIRION TECHNOLOGIES SOLUTIONS, LLC. (PUERTO RICO)</b>	801 Brickell Avenue, Suite 2400, Miami-Florida, 33131, USA.
<b>CIRION TECHNOLOGIES, LTD.</b>	Century House, 16 Par-la-Ville Road. Hamilton, Bermuda, HM08. Bermuda, USA.
<b>STONEPEAK PATAGONIA HOLDINGS LLC</b>	550 West 34th Street, 48th Floor, New York, NY, 10001, USA.

GRI 2-6

# 1.3 About Cirion Technologies

Digital transformation is an essential strategic imperative for the future. At Cirion Technologies we offer innovative technological solutions and promote regional progress by positioning ourselves as allies in the digitalization of companies in Latin America.

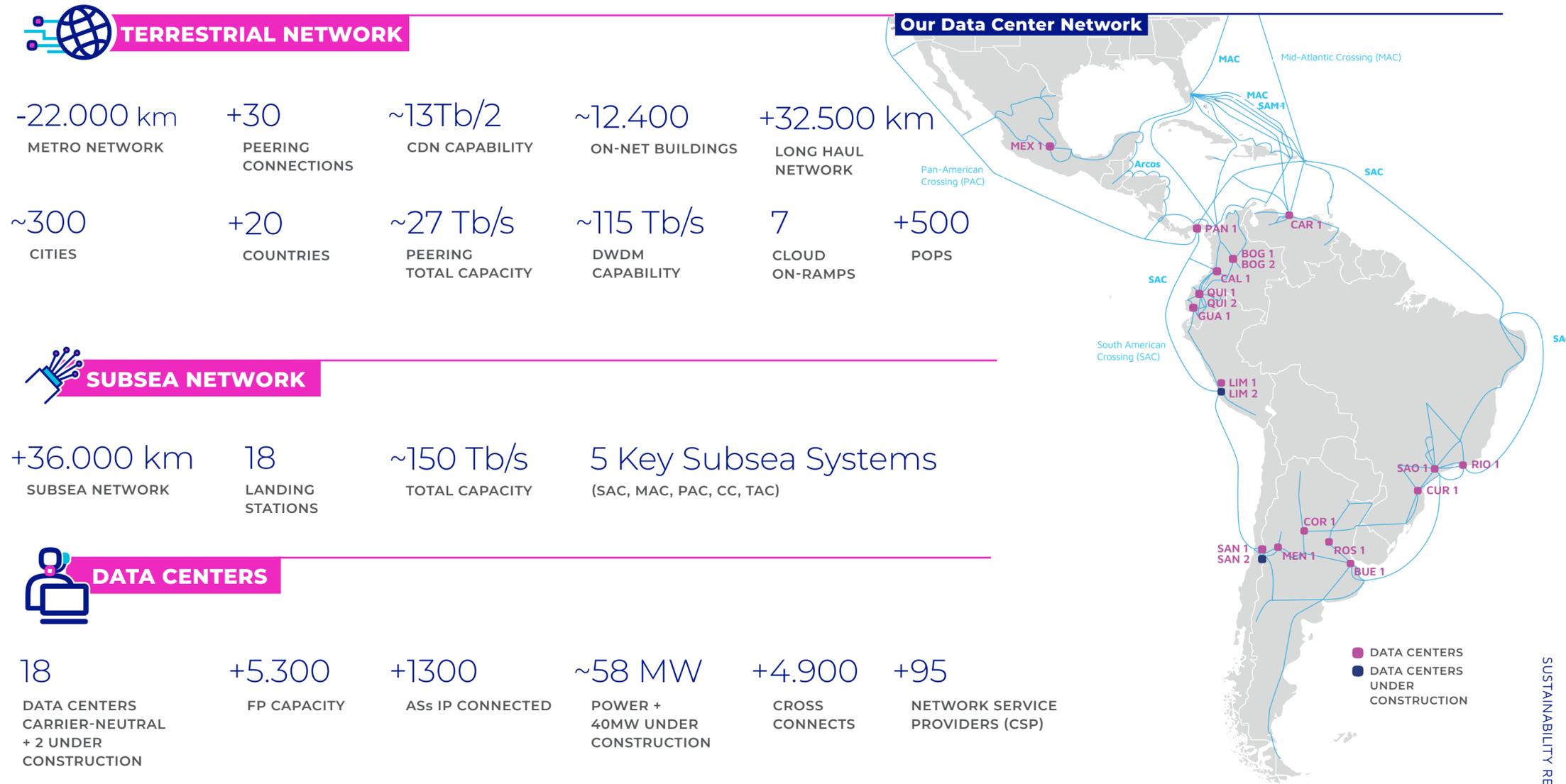
Our reputation is based on the reliability and excellence of pan-regional services, with global solutions adapted to local contexts and a long-term vision strategy supported by a robust infrastructure.

We are strategically positioned to take advantage of digital trends in the region's dynamic economies.

*Our influence in the region's most dynamic economies puts us in a strategic position to capitalize on emerging digital trends.*

We have an extensive global network, with 54,500 kilometers of terrestrial and metropolitan fiber optics, 36,000 kilometers of submarine cables and 18 Landing Stations, complemented by five key submarine systems (SAC, MAC, PAC, CC, TAC), ensuring critical connectivity in Latin America and direct links with the U.S.

We serve more than 5,500 customers in the region, including multinationals and government entities. Our advanced network and critical infrastructure allow us to deliver cutting-edge solutions and exceptional connectivity, reaffirming our commitment to our customers' growth and trust.



GRI 2-1

## 1.3 About Cirion Technologies

Our operation is orchestrated from the headquarters in Miami, United States, where the management and deployment of services in a variety of jurisdictions is coordinated, including Argentina, Brazil, Chile, Colombia, Costa Rica, Ecuador, Mexico, Panama, Peru, Uruguay and Venezuela.

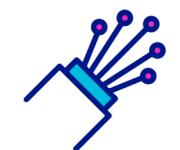
In addition, we extend our coverage and service capacity through a network of business partners, reaching customers in the Bahamas, Belize, Bermuda, Bolivia, El Salvador, Guatemala, Honduras, Nicaragua, Paraguay, Puerto Rico, Dominican Republic, Trinidad and Tobago, as well as in the U.S. Virgin Islands, ensuring an **integral and effective presence throughout the region.**



115 Tb/s  
TERRESTRIAL NETWORKS CAPACITY



GREATER THAN THE  
27 Tb/s  
DATA EXCHANGES WITH OTHER OPERATORS



150 Tb  
TOTAL SUBMARINE NETWORK CAPACITY

*During 2023, we have strengthened our fiber optic network in Latin America, adding more than 115 Tb/s of capacity. We have increased capacity in several submarine cable segments, bringing the total capacity of the submarine network to approximately 150 TB.*

GRI 2-6

## 1.3 About Cirion Technologies

### Our Data Centers

**Cirion stands out in Latin America with its powerful network of 18 owned and interconnected Data Centers**, establishing itself as the leading provider of Data Center solutions. We serve a diverse portfolio of customers, including hyperscalers, service providers, and enterprises. Our unique infrastructure ensures outstanding reliability and performance, tailored to meet the dynamic demands of the region's technology sector.

As a carrier-neutral provider, we offer companies across various sectors access to the most comprehensive ecosystem in the region, ensuring security and efficient, low-latency connections.

**Our commitment to the development and continuous improvement of our digital and technological infrastructure in Latin America is firm, as reflected in investments totaling approximately \$270 million in 2023.** The company's recent expansions include the addition of new network infrastructure and data centers, such as the integration of the new SAN2 and LIM2 data centers into Cirion's existing network and the significant expansion of the data center complex in São Paulo, Brazil (SAO1), which has increased its total capacity by more than 50%. Furthermore, we continue with the expansions of our Data Centers in Rio de Janeiro (RIO1) and Buenos Aires (BUE1), ensuring sustainable scalability for our amid the growing adoption of cloud services and digital demand in the region.

**In 2023, we have undertaken significant initiatives that have been very well received by our customers.** Our teams worked tirelessly on the development of our regional data center platform, the expansion of our terrestrial fiber optic network, the increase in the capacity of our submarine cable system connecting key markets in Latin America, and the introduction of new solutions, among other actions.

**These efforts have strengthened our brand and reaffirmed our leadership position in the region.**

18

CARRIER-NEUTRAL  
DATA CENTERS

U\$D 270  
Million

INVESTMENTS  
IN 2023

SAN2  
LIM2,

NEW DATA  
CENTERS

+ 50%

TOTAL CAPACITY  
INCREASE IN  
BRAZIL

+RIO1  
+BUE1

DATA CENTER  
EXPANSION IN RIO  
DE JANEIRO AND  
BUENOS AIRES



GRI 2-6

## 1.3 About Cirion Technologies

### At Cirion, we foster strong relationships

With an extensive network of more than 3,200 suppliers, we collaborate with a diverse range of entities, including specialty equipment manufacturers, to access and last mile suppliers.

We have a meticulous supplier selection procedure based on careful background checks and thorough reviews of certifications. This ensures the integrity and quality of our supply chain and reaffirms our commitment to operational excellence.

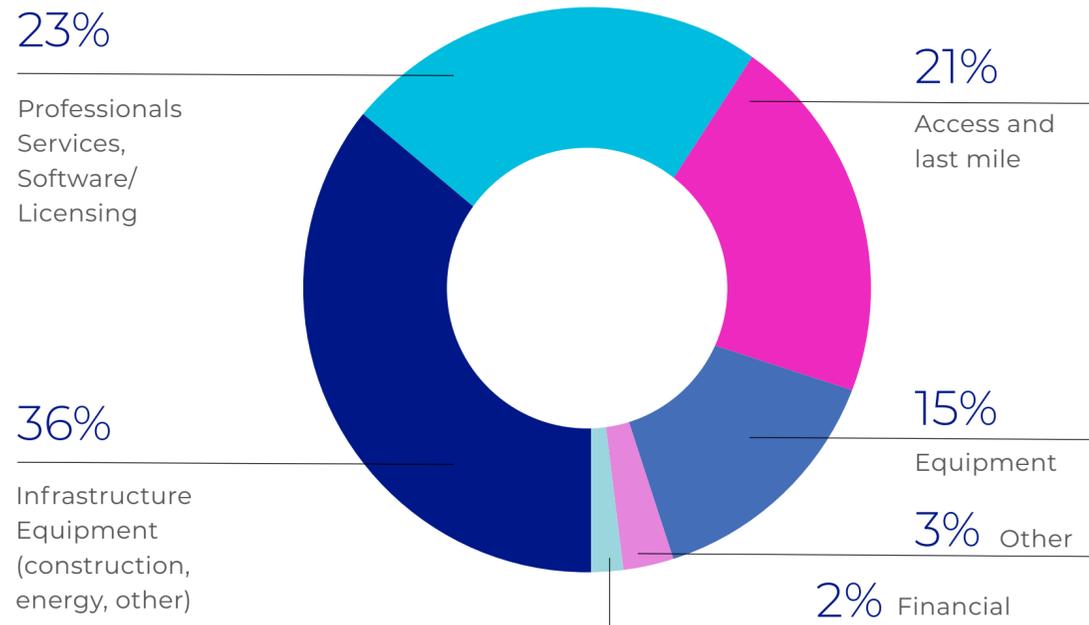
The strategic alliances we have established with our business partners are fundamental to the ecosystem of solutions that Cirion offers.

Working together, we have raised the standards of excellence and provided innovative solutions perfectly tailored to the specific needs of our customers.

#### ALLIANCE ECOSYSTEM



#### SUPPLIERS BY SECTOR



## 2. COMMITTED WITH SUSTAINABILITY

- Our key stakeholders
- Determination Process of material issues
- Sustainable Development Goals



*At Cirion Technologies, we are driven by our purpose to further Latin America's progress through technology. Our commitment to environmental stewardship, social responsibility, and transparent governance enables us to create lasting value for our stakeholders. By aligning innovation with sustainability, we empower the communities we serve and contribute to a more resilient and sustainable future for our region and the planet.*

**Emilio Madero**

EVP, MARKETING

GRI 2-29

## 2.1 Committed to sustainability

### Our stakeholders

To create richer business opportunities, Cirion creates shared value with our stakeholders, including customers, investors, partners, communities and government institutions.

We strive to generate spaces for dialogue that allow us to understand their expectations and needs, such as through the relationship survey conducted twice a year, which results in the Net Promoter Score (NPS).

*We are committed to providing training on digital tools in educational establishments, as well as promoting and hiring local labor.*

At Cirion, we are also committed to fulfilling social responsibilities related to the community environment where we operate, emphasizing the importance of closely collaborating with local educational institutions. Additionally, in the process of acquiring and renewing licenses and constructing data centers, we maintain direct communication with regulatory entities and public institutions in each country. In this context, we are committed to providing training on digital tools in educational institutions, as well as promoting and hiring local labor, thus reaffirming our commitment to sustainable development and social inclusion in the regions where we are present.



GRI 3-1; 3-2

## 2.2 Committed to sustainability

### Process of determining material issues

The topics that our stakeholders consider important are crucial and form the basis of our materiality analysis, significantly influencing the definition of material issues for Cirion.

In line with this, we conducted a survey involving investors, customers, employees, supply chain leaders, media representatives, and industry association representatives, which allowed us to capture a comprehensive and diverse view of the most significant priorities and issues of our stakeholders.

In particular, the process of defining the material issues followed different consecutive and interdependent stages, among which we can define:

#### PARTICIPATORY DEFINITION PROCESS



#### STAKEHOLDERS IDENTIFIED AND SURVEYED THROUGHOUT THIS PROCESS

- Investors
- Customers
- Employees
- Supply Chain
- Industry Associations
- Media

GRI 3-1; 3-2

## 2.2 Committed to sustainability

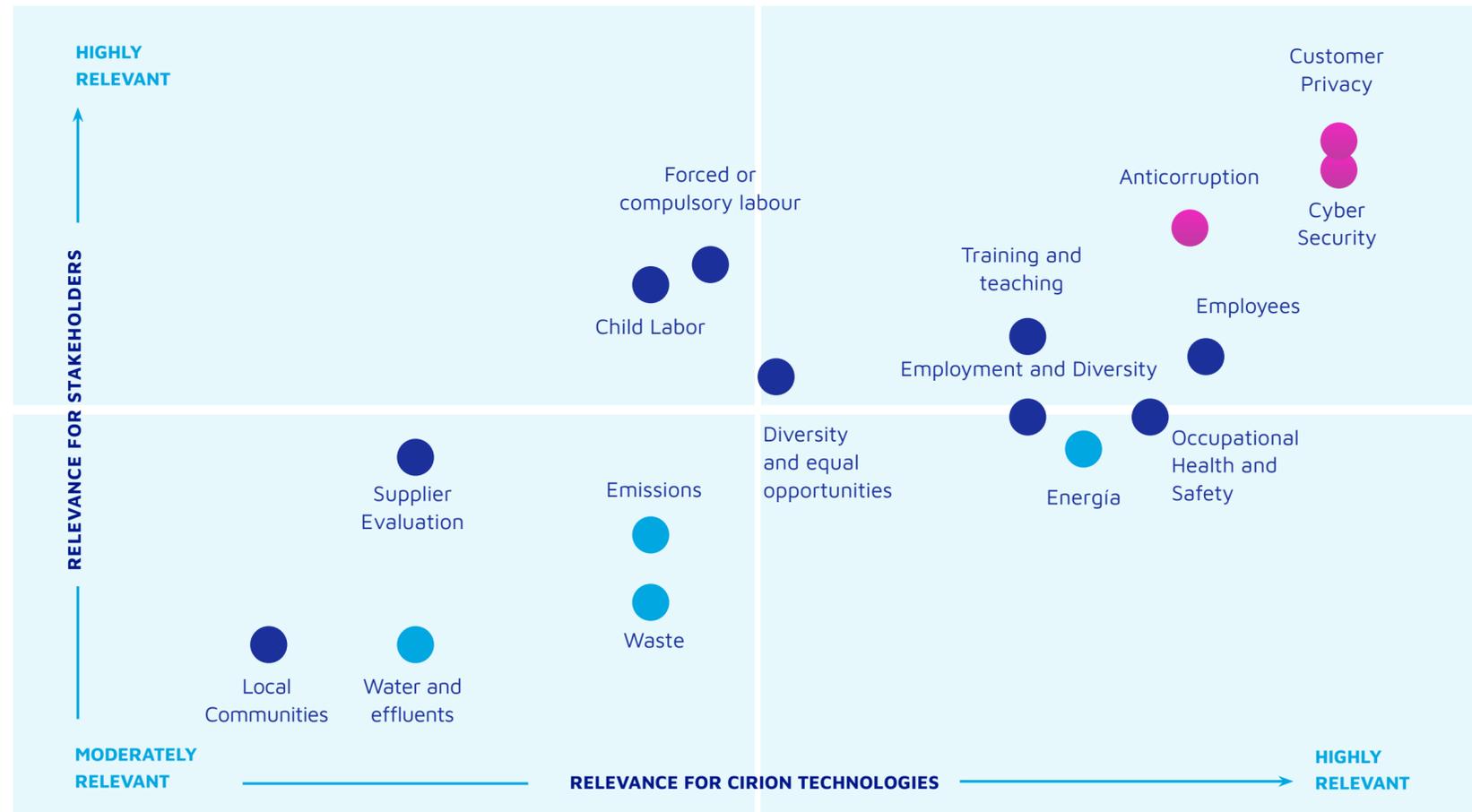
### Process of determining material issues

During our materiality analysis with stakeholders, we categorize each aspect of the environmental, social, and governance (ESG) dimension into four levels of importance: non-relevant, low-relevance, moderate-relevance, and high-relevance.

After evaluating each aspect, we develop the materiality matrix presented here, which allows us to prioritize the topics according to the level of impact that Cirion has on the environment. This result has been fundamental in establishing our material issues:

1. Anticorruption
2. Cybersecurity
3. Customer privacy
4. Measuring human rights impact across the value chain
5. Healthcare and security in the workplace
6. Training and development
7. Employment practice
8. Diversity, inclusion and equal opportunities
9. Energy efficiency and renewable energy
10. Gas emissions, quality of air, and carbon footprint
11. Waste management, co-processing and circular economy
12. Community relations

#### MATERIALITY ANALYSIS



#### RELEVANCE TO INTERESTS GROUP BY MATERIAL TOPIC



## 2.3 Committed to sustainability

### Sustainable Development Goals

In our effort to be agents of change, at Cirion we align our commitments with the goals of the **17 Sustainable Development Goals (SDGs), established by the United Nations General Assembly in 2015 as part of the 2030 Agenda for Sustainable Development.** We have a special focus on 8 key areas of work that we detail on the next page.



## 2.3 Committed to sustainability



### ENVIRONMENTAL COMPLIANCE AND MANAGEMENT

Our dedicated Environment, Health, and Safety (EHS) team conducts meticulous assessments and audits of our operations and suppliers responsible for waste management. We are committed to constantly monitoring environmental legislation in each of the markets in which we operate to ensure strict adherence to current regulations and laws.



### ENERGY AND EMISSIONS

In order to minimize our carbon footprint, we are committed to identifying and implementing strategies aimed at energy efficiency and the reduction of greenhouse gas (GHG) emissions.



### WATER

We rely on the World Resources Institute's Water Quality Index to conduct a comprehensive assessment of our operations to identify and apply proactive methods for reducing water consumption. This is particularly imperative in countries or regions classified as high-water risk, where our environmental responsibility drives us to focus on the conservation of this limited resource.



### WASTE

Annually, we manage to divert millions of kilograms of electronic and communications equipment from landfills, implementing various recycling options. These initiatives include our modem and router take-back program, which offers customers the ability to return your devices. Subsequently, this equipment is subjected to reuse processes or is sent to recyclers accredited by R2 certification, thus ensuring environmentally responsible management of electronic waste.



### ENVIRONMENTAL ASSESSMENT OF SUPPLIERS

We choose to collaborate with suppliers who demonstrate a firm commitment to providing services that promote environmental sustainability and energy efficiency. In addition, we expect these trading partners to interact with their respective supply chains to proactively assess and manage sustainability-related challenges.



### CLIMATE PREPAREDNESS

We implement an interdisciplinary business continuity program, which focuses on taking preventive measures, collaboration between areas through effective communication, agile response and recovery strategies against disasters caused by climate change. This approach allows us to efficiently address and mitigate any disruptive incidents that may impact our operations.



### OCCUPATIONAL HEALTH AND SAFETY

The EHS team conducts regular risk assessments while also monitoring current health and safety legislation. These practices ensure that our operations consistently align with regulatory standards and remain in legal compliance.



### COMMUNITY

We have established strategic partnerships with various renowned organizations and foundations to promote initiatives that significantly improve the quality of life for local residents. In Argentina, we support education through scholarships at Di Tella University and actively participate in events such as the charity race organized by UNICEF. In Brazil, our presence is characterized by the promotion of social progress and community cohesion.



We contribute significant donations to the Maria Carolina Foundation and the Municipal Child Support Fund of Cotia, ensuring that financial resources are channeled into programs that directly impact the lives of children and their families. In Venezuela, we promote a sustainable garden to combat hunger and educate on sustainability. Our commitment to social responsibility seeks to create a positive and lasting impact, integrating business success with community well-being.



### 3. COMMITTED TO OUR GOVERNANCE

- Our structure
- Our Ethical Commitment
- Anticorruption



*At Cirion Technologies, strong governance is the foundation of our commitment to integrity, transparency, and accountability. We uphold the highest ethical standards in every decision we make, ensuring responsible leadership that fosters trust with our stakeholders and drives sustainable growth across the region.*

**Valeria Plastino**

EVP, GENERAL COUNSEL &  
CHIEF COMPLIANCE OFFICER

GRI 2-9; 2-11;

## 3.1 Committed to our governance

### Our structure

Cirion Technologies' governance is led by a nine-member **Board of Directors**, chaired by Andrew Thomas, which meets quarterly to discuss financial performance, operational management, strategy and resource allocation.

The Directory has three sub-committees.

Sub-committees are essential to the effective governance and sustainable development of Cirion Technologies.

These sub-committees play a vital role in strengthening Cirion Technologies' governance structure, contributing to informed decision-making and the sustainable advancement of the organization.



#### THE BOARD HAS THREE SUB-COMMITTEES:

### 01. COMPENSATION SUB-COMMITTEE

Reviews and approves employee compensation and benefits policies.

### 02. AUDIT AND RISK SUB-COMMITTEE

It ensures the accuracy of financial reporting and oversees independent audit, integrity of internal controls, regulatory compliance, and risk management.

### 03. CAPITAL INVESTMENTS SUB-COMMITTEE

Evaluates and approves capital investments to align with the strategic objectives of the company.

GRI 2-12; 2-13; 2-14; 2-17

## 3.1 Committed to our governance

### Our structure

**To strengthen the management of its impact on governance, the environment and social aspects, the Board of Directors of Cirion Technologies relies on the ESG Sub-Committee.**

This Sub-Committee is composed of three high-level executives: Emilio Madero (EVP, Marketing), Marcelo Melamed (EVP, Human Resources), and Valeria Plastino (EVP, General Counsel & Chief Compliance Officer).

The ESG Sub-Committee is responsible for overseeing and directing the company's sustainability initiatives, ensuring that corporate practices reflect a firm commitment to the principles of social and environmental responsibility.

**The Board of Directors receives regular reports on the management of environmental impacts and the effectiveness of the measures taken to mitigate them.** It is also aware of the minutes of the annual reviews of the company's Integrated Management System, ensuring continuous oversight and constant improvement in Cirion's operations.

**The Cirion Technologies Board of Directors supervises and validates the sustainability report,** ensuring that it accurately reflects the company's sustainable practices and achievements. Works closely with the Audit and Control Committee in quarterly meetings to promote policies and projects that improve Cirion's environmental performance.

**The ESG Sub-Committee communicates sustainability progress to Stonepeak and Australian Super,** shareholders of the company, ensuring that Cirion's actions are in line with their expectations of ESG responsibility, thereby strengthening the company's commitment to sustainability and aligning corporate strategy with the interests of shareholders.



#### ESG COMMITTEE ORGANIZATIONAL CHART



GRI 2-15; 2-16; 2-24

## 3.2 Committed to our governance

### Our ethical commitment

**Cirion's total commitment** to strengthening an ethical business culture resulted in the development of the **Corporate Compliance Program**, which outlines and disseminates the standards that guide the company's ethical and compliance culture.

Through our annual mandatory training programs on the **Code of Conduct**, we encourage **transparent behavior** among our employees and prevent the risks associated with poor management. In 2023, 97% of our employees successfully completed the required training on Cirion's **Code of Conduct**.

**Finally, it is important to note that 97% of employees completed the company's conflict of interest declaration in 2023.** A detailed evaluation of the data collected revealed that the risk of conflict of interest is exceptionally low. As a result of this analysis, specific recommendations were made to both employees and their supervisors to maintain and strengthen Cirion's favorable position.

Our **Integrity Line** is the channel through which employees can raise their queries and reports possible conflicts of interest that may arise, always respecting the confidentiality of reports made in good faith. In 2023, no critical concerns were detected that needed to be communicated to the Audit and Risk Committee of the Board of Directors. This Committee is the highest authority that examines the results of Cirion's conflict of interest certifications and corroborates the preventive or palliative measures implemented in cases where they are required.



*The risk of facing situations of conflict of interest is exceptionally low.*

GRI 2-23; 2-24

## 3.2 Committed to our governance

### Our ethical commitment

**Cirion's Code of Conduct** represents a fundamental policy within our organization, providing essential guidance for employee behavior and ensuring that our operations are conducted with the highest level of integrity. This Code is also the central pillar of our Business Integrity and Regulatory Compliance Program, reflecting our commitment to business ethics.

Complementing our [Code of Conduct](#), we adopt corporate principles that directly influence our strategic decisions and strengthen our relationships with customers, partners and the community. These principles are widely known to all Cirion members, as they are communicated through various platforms and at key moments, such as induction programs for new employees, our regular all-hands calls, and in training programs linked to performance evaluations, where they are considered key elements for staff appraisal.

#### Our corporate principles are:

- **Doing the Right Thing**
- **Commitment to Excellence and Growth Mindset**
- **Positive Attitude**
- **Leading Diversity**
- **Change Generator**

For more information on our ethical business values, we invite you to visit our [website](#) and follow our updates on [LinkedIn](#).



*We adopt corporate principles that directly influence our strategic decisions and strengthen our relationships with customers, partners, and the community.*

In addition, we carry out mandatory training sessions on the Supplier Code of Conduct for all our employees. The purpose of these sessions is to strengthen understanding and ensure effective implementation of our Supplier Code of Conduct, which is essential to extend and promote our corporate values beyond our organization.

GRI 2-15; 2-16; 2-24

## 3.2 Committed to our governance

### Our ethical commitment

Cirion sets clear requirements for its suppliers, ensuring their practices align with the guidelines of our **Supplier Code of Conduct**. This code covers fundamental human rights issues, such as respect for workers' freedom of association and compliance with laws prohibiting any form of child labor. Additionally, our suppliers are committed to rejecting the use of involuntary or forced labor in all their operations, including the fight against human trafficking.

At Cirion, we continuously strive to promote responsible business management and are prepared to report any actions by our suppliers that contravene the provisions of the **Cirion Supplier Code of Conduct**. Additionally, policies and procedures that reinforce our corporate values, as detailed in the Code, are available to all employees on Cirion's intranet.

- **Anticorruption policy**
- **Conflicts of Interest Policy**
- **Corporate Governance guidelines**
- **Statement of the Insider Information Policy**
- **Compliance with information and records**
- [Supplier Code of Conduct](#)
- **Policy of business courtesies**
- **Antitrust and fair competition policy**
- **Business sanctions compliance policy**
- **Compliance with customs and export rules**



GRI 2-25; 2-26

## 3.2 Committed to our governance

### Our ethical commitment

**At Cirion, integrity, honesty, and ethics guide our operations.**

We have established a **Corporate Compliance Program** to clearly communicate our ethical and legal standards.

Annually, we offer trainings on the **Code of Conduct**, emphasizing respect for human rights and our values, and providing a space to resolve doubts.

We encourage employees to report conflicts or concerns through established channels, including our Integrity Line, which operates 24/7 in English, Spanish and Portuguese, and allows for confidentiality. Cases are diligently investigated and reported on results and corrective actions, ensuring transparency.

Our **Corporate Compliance Executive Committee**, comprised of the CEO, the EVP of Legal Affairs and the EVP of Human Resources, meets quarterly to evaluate cases and produce a comprehensive report that is presented to the Audit and Risk Committee.



*Annually, we offer training on the Code of Conduct, emphasizing respect for human rights and our values, and providing a space to resolve doubts.*

GRI 3-3

## 3.3 Committed to our governance

### Anticorruption

**Cirion's Anticorruption Policy establishes a solid framework that proscribes any form of corruption and seeks to prevent illicit acts that may compromise the integrity of the company.**

This policy is supplemented by other internal regulations, such as the Business Code of Conduct, the Confidential Information Use Policy, and the Supplier Code of Conduct. Our business partners and suppliers are committed to adhering to these codes, thereby ensuring business conduct that is governed by ethics and transparency.

Therefore, **integrity is the central axis of the activities supervised by the Compliance team**, whose objective is to promote practices that prevent corruption. At the same time, the Internal Audit team is tasked with monitoring compliance with internal policies, conducting periodic audits of the processes involved in managing potential risks.

**To ensure that all employees understand and adhere to the principles of our Anticorruption Policy, we conduct an annual mandatory anti-corruption training campaign for all employees, management and board members.**

In 2023, the training reached 2.149 employees, achieving a participation rate of 98%.

These participants also had the opportunity to complete surveys provided by the company to offer their feedback and suggestions. In addition, the company disseminates communications and updates on anti-corruption policies and procedures through the Intranet.



*In 2023, the training reached 2.149 employees, achieving a participation rate of 98%.*

GRI 205-1

## 3.3 Committed to our governance

### Anticorruption

At Cirion we are committed to preventing and mitigating the risks associated with corruption, so we seek to have an adequate understanding of them to then develop effective control activities.

Specifically, as a result of the evaluation process, we have identified risks associated with conflicts of interest, commercial courtesies, accounting records, staff training, due diligence, documentation of expenses, monitoring of complaints, and bribes involving employees and third parties, which contravene our contracts.

#### Prevention and mitigation measures

- Adoption and dissemination of the **Employee Code of Conduct, Anti-Corruption Policy** and **Supplier Code of Conduct**, which prohibit all types of corruption's acts and compliance with applicable local anti-corruption laws.
- **Annual virtual training** for all collaborators in anti-corruption.
- During 2023, 98% of our employees completed **Mandatory Training on Anti-Corruption**.
- **Due Diligence process** to know counterparties through access to consultation on binding and restrictive lists.
- **Local anti-corruption and anti-bribery programs** (as required by local regulations).

#### IDENTIFICATION OF IMPACTS AND MEASURES

DIMENSION	REAL AND POSITIVE IMPACTS	POTENTIAL AND NEGATIVE IMPACTS	PREVENTION AND MITIGATION INITIATIVES
 <p><b>ECONOMY</b></p>	Increased trade relations.	Failure to comply with anti-corruption regulations.	Adoption and dissemination of the Employee Code of Conduct, Anti-Corruption Policy and Supplier Code of Conduct, which prohibit all types of corruption and compliance with the corresponding local anti-corruption laws.  Annual virtual training for all Anti-Corruption employees.
 <p><b>ENVIRONMENTAL</b></p>	Availability of resources for the adoption of programs and measures that allow us to comply with local environmental and safety laws for the protection of the environment.	Penalties for non-compliance with environmental legislation.	During 2023, 98% of our employees completed Mandatory Training on Anti-Corruption. Due Diligence process to know the counterparties through access to consultation in binding and restrictive lists. Local anti-corruption and anti-bribery programs (as required by local regulations).
 <p><b>HUMAN RIGHTS</b></p>	Development of an ethical culture and good business practices, as well as the availability of resources for the creation of programs for the benefit of the vulnerable population and the strengthening of diversity and inclusion, prevention of child labor and forced labor.		Due Diligence Process to know to counterparties through access to consult binding and restrictive lists.  Local anti-corruption programs and anti-bribery (as required by local regulations).

GRI 205-1; 205-2; 205-3

## 3.3 Committed to our governance

### Anticorruption



Audits

At Cirion, we conduct regular audits to ensure adherence to the **Business Conduct Policies**, randomly selecting different countries in which we operate to carry out such reviews.

During 2023, the audits focused on Chile, Ecuador, Peru and the office in Miami, United States.



Analysis

The audit procedure includes both **compliance tests and substantive analyses**, which are carried out by selecting representative samples from different segments of the population.



Evaluation

Evaluate the effectiveness of the **corporate compliance program**, which includes, among other elements, anti-bribery measures.

**Confirm that internal policies and procedures** are followed regarding hiring and interaction with third parties.



Review and Registration

Ensure that **payments to third parties and reimbursements** to employees are made in accordance with the company's expense policies and that all such transactions are properly recorded and documented.

*During the 2023 financial year no cases of corruption, incidents or associated legal cases were confirmed, so Cirion kept its integrity intact, in accordance with internal policies.*

## 4. COMMITTED TO SECURITY

- Customer privacy
- Cybersecurity
- Human Rights in the supply chain



*At Cirion Technologies, security is at the core of everything we do.*

*We are committed to safeguarding the data and privacy of our customers with cutting-edge technologies and rigorous protocols.*

*By continuously enhancing our cybersecurity and data protection practices, we ensure trust, resilience, and the highest standards of digital integrity across all our operations."*

**Luciano Parola**

EVP, CHIEF INFORMATION OFFICER

GRI 3-3

## 4.1 Committed to security

### Customer Privacy

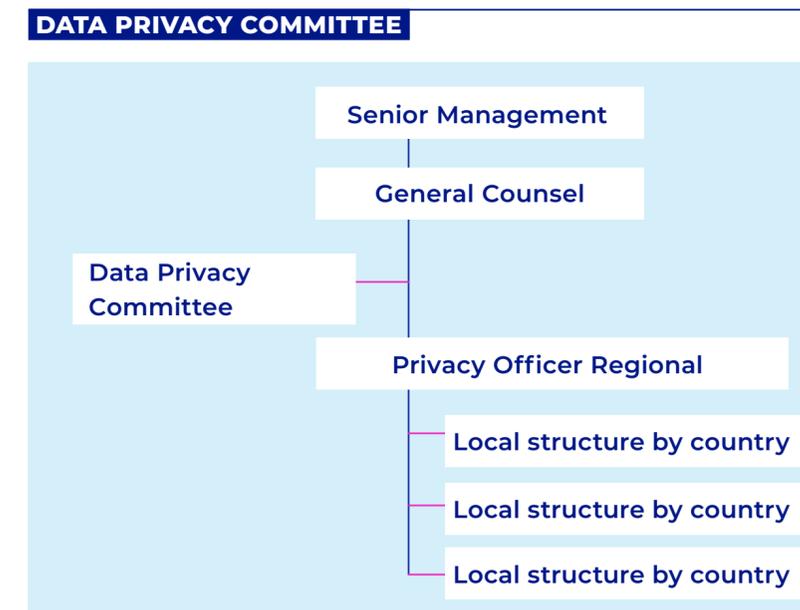
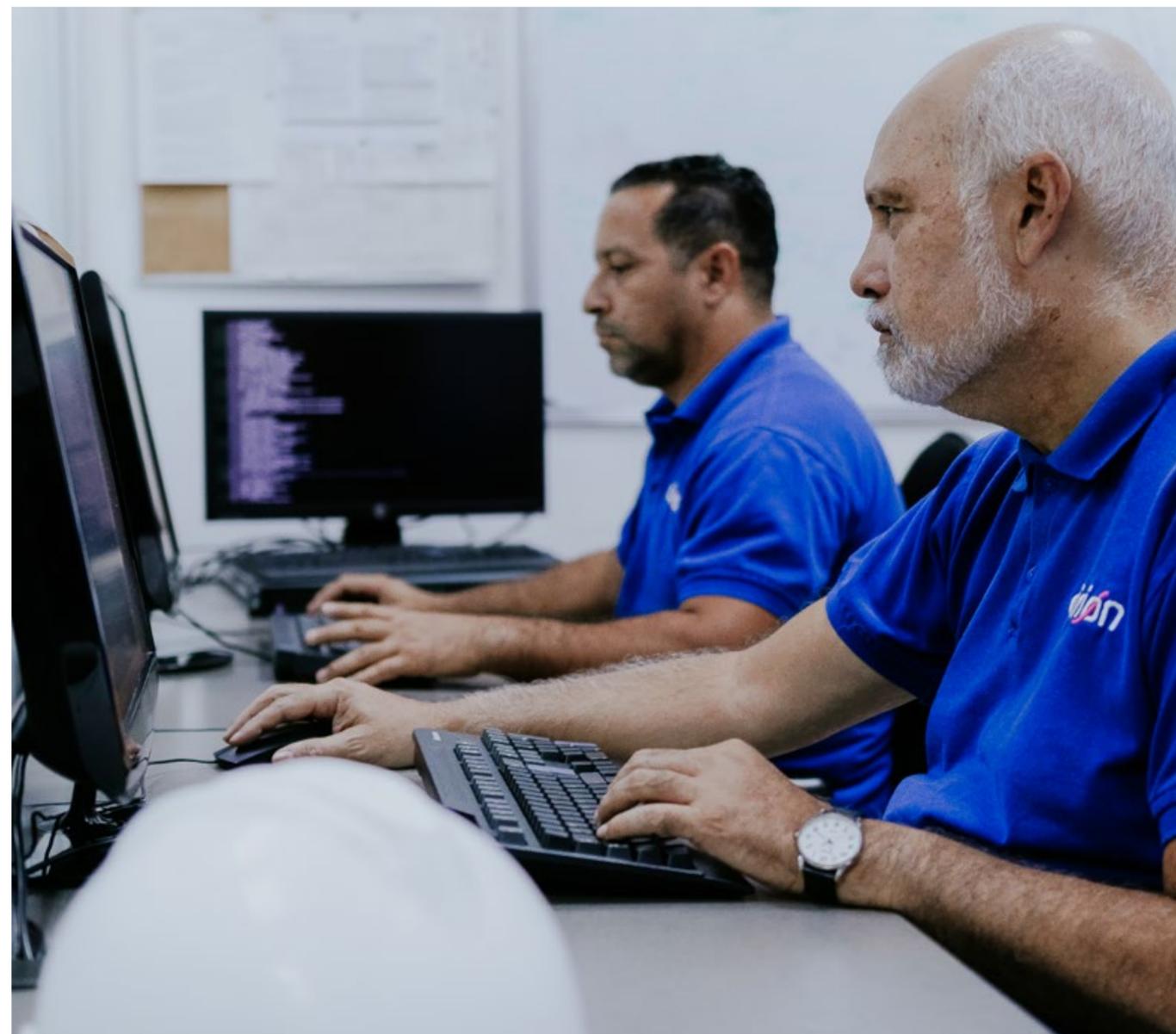
In the second half of 2023, the Data Privacy Committee was established, in charge of coordinating the Comprehensive Data Privacy Program.

This committee meets monthly and is supported by the Board of Directors and guidance from the legal department, ensuring compliance with relevant privacy regulations. Below is a diagram illustrating Cirion's organizational structure in relation to the protection of personal data.

Cirion's Data Privacy Committee has the following responsibilities assigned:

- **Manage and respond** to requests concerning data protection.
- **Create policies and procedures** for the assessment and management of privacy-related risks.
- **Propose improvements** for the updating and enhancement of the privacy policy and strategy.
- **Analyze the privacy impact** of new projects.
- **Organize the response** to incidents affecting personal data.
- **Appoint those responsible** for data mapping, privacy assessments, and impact analyses.

As part of our Comprehensive Data Privacy Program, Cirion has reviewed and updated the personal data protection clauses in contracts with customers, suppliers and employees, ensuring



compliance with legal regulations in each jurisdiction. We have incorporated One Trust, a cutting-edge software tool in personal data compliance management, which has significantly improved the quality of our services in aspects such as:

- **Management and control** of cookies on our websites.
- **Online service** for data subjects' rights.
- **Mapping of processing activities** in processes, assets, products, and suppliers.
- **Impact assessments** on the company's main operations.
- **Management of consents** for personal data processing.
- **Risk analysis and evaluation.**

GRI 3-3; 418-1

## 4.1 Committed to Security

### Customer Privacy

Our website offers **access to updated Privacy Policies and Notices**, including specific documents for Colombia and Mexico and notices for video surveillance and reception areas, complying with local regulations.

Internally, we **disseminate our Personal Data Protection Policy to employees and contractors** to ensure the correct use of information and legal compliance.

**We conduct annual data privacy trainings for all employees**, reaching 96% compliance in 2023. We have obtained ISO 27001 certification in countries such as Argentina, Chile, Peru, Ecuador, Colombia, and Brazil, and follow ISO 27701 standards in Brazil, with plans to expand to Colombia, Peru, Argentina, Ecuador and Chile.

These international certifications ensure proper program management and risk mitigation.

***During 2023, no cases of information leaks or security incidents that represent a loss or disclosure of confidential information or personal data have been recorded.***



#### REGULATORY FRAMEWORK

COUNTRY	APPLICABLE LAW
<b>Argentina</b>	Act 25,326, Personal Data Protection Act.
<b>Brazil</b>	Act 13,709/2018, Personal Data Protection General Act.
<b>Chile</b>	Act 19,628 on private life protection.
<b>Colombia</b>	Act 1581, 2012, Personal Data Protection and Regulatory Decree 1377, 2013.
<b>Costa rica</b>	Act No. 8968, Individual Protection Act for personal data treatment and regulation thereof.
<b>Ecuador</b>	Official Record Supplement 459, Personal Data Protection General Act.
<b>Mexico</b>	Personal Data Protection Federal Act.
<b>Panama</b>	Act 81, 2019, Personal Data Protection and Regulatory Decree.
<b>Peru</b>	Act 29733, Personal Data Protection and Regulatory Decree approved by Supreme Decree N° 003-2013-JUS.
<b>United States of America (California)</b>	California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (Cal. Civ. Code 1798.100 et seq.); California Shine the Light Law (insert citation); California Online Privacy Protection Act.
<b>Uruguay</b>	Act No. 18,331, Personal Protection Act and "habeas data" action, Regulatory Decree No. 414/009; Act No. 19.670 and Regulatory Decree No. 64/020.
<b>Venezuela</b>	Constitution of the Bolivarian Republic of Venezuela.

GRI 2-6

## 4.2 Committed to security

### Cybersecurity

**At Cirion, we take a strategic approach to the challenges of transmitting large volumes of information, integrating cutting-edge cybersecurity methodologies.**

Our objectives are ambitious: on one hand, **we work to ensure the comprehensive protection of our systems and their data**, generating positive impacts for the organization; on the other, we strive to mitigate risks and reduce adverse impacts that may affect our company and our customers.

**We present the main positive and negative impacts** identified around cybersecurity management.

As well as the prevention and mitigation measures that are implemented in Cirion.

#### IMPACTS

DIMENSION	POSITIVE IMPACTS	NEGATIVE IMPACTS
<b>Economy</b>	<ul style="list-style-type: none"> <li>Long-term cost savings.</li> <li>Competitive advantage by attracting conscious customers.</li> <li>Encouragement of innovation in safe technologies.</li> </ul>	<ul style="list-style-type: none"> <li>Financial losses due to security breaches.</li> <li>Legal costs related to fines and lawsuits.</li> <li>Reputational damage and loss of revenue.</li> </ul>
<b>Environmental</b>	<ul style="list-style-type: none"> <li>Sustainable practices reducing environmental impact.</li> <li>Environmental awareness through education.</li> </ul>	<ul style="list-style-type: none"> <li>Power consumption in Data Centers.</li> <li>Generation of electronic waste.</li> </ul>
<b>Human rights</b>	<ul style="list-style-type: none"> <li>Protection of privacy and human rights.</li> <li>Digital inclusion and respect for rights.</li> </ul>	<ul style="list-style-type: none"> <li>Violation of privacy and discrimination.</li> <li>Restriction of access to information.</li> </ul>

#### PREVENTION AND MITIGATION MEASURES



#### Data Protection at Cirion

##### Equipment Restructuring

Security has been reorganized under the CIO and CISO, creating specific roles in Policy Risk & Compliance, Platform & Application Security, Corporate Network Security and Business Continuity, for a comprehensive approach to cybersecurity.

##### Updated regulatory framework

Implementation of an information security framework based on ISO 27001:2022 and NIST practices, to strengthen cybersecurity.

##### Privacy Management

Creation of a Privacy Committee and a Privacy Management Program that designs policies in accordance with local regulations, protecting confidential data.



#### Cybersecurity Training

##### High Participation Rate

The 99% of employees completed annual security training in 2023 with KnowBe4 and RESGUARDA, evidencing the commitment to cybersecurity education.

##### Competency Assessment

The SAPA Assessment revealed an average cybersecurity competency of 67%, identifying areas for improvement for future training.



#### New processes and tools

##### SBCM simulations

More than 150 simulations of incident recovery plans to improve processes and response times.

##### Advanced Security Tools

Integration of Trellix XDR to improve SOC efficiency and reduce false positives, and Trellix Network Security with technologies such as MVX, machine learning, and AI, along with IPS, to protect against advanced cyber threats.

GRI 3-3; 408-1; 409-1

## 4.3 Committed to security

### Human rights in the supply chain

Protecting the integrity of all individuals involved in our operations reflects our commitment to universal human rights principles.

We ensure that our safety practices not only safeguard our employees and customers, but also respect and promote the dignity and rights of every person in our supply chain. This comprehensive approach is essential for a sustainable and ethical operation that benefits all stakeholders.

Our policies include:

- Privacy and data protection.
- Rejection of discrimination and support for diversity and inclusion.
- Advocacy for individual rights and opposition to modern slavery and human trafficking.
- Creation of a safe work environment.
- Respect for human rights in the supply chain.
- Commitment to community well-being.
- Encouraging the communication of concerns through our Integrity Line.

We maintain ethical and legal business conduct, requiring suppliers to comply with our Code of Conduct, which prohibits child and forced labor. We conduct thorough due diligence with suppliers, and, in the event of non-compliance, we terminate contracts.



*In 2023, no violations were detected at our human rights policy by suppliers, or environmental claims.*

GRI 414-1

## 4.3 Committed to security

### Human rights in the supply chain

At the time of entering into contractual agreements with Cirion, all of our suppliers adhere to our [specific Supplier Code of Conduct](#).

The code includes **key principles** such as the promotion of diversity and inclusion, the eradication of forced labor and modern slavery, the absolute prohibition of child labor and the exclusion of minerals from conflict zones.

At Cirion, we have high expectations of our suppliers' commitment to compliance with current environmental laws and regulations, including, but are not limited to:

- The correct management and disposal of hazardous substances;
- the prevention of air, land and water pollution;
- conservation of natural resources, wildlife and wetlands; and the implementation of effective recycling practices.

We encourage our suppliers to adopt robust environmental management systems, with a focus on environmental monitoring and continuous improvement of their environmental performance.

It is imperative that our suppliers perform their best efforts to prioritize services that favor sustainability and energy efficiency, and that they work closely with their own supply chains to assess and mitigate environmental and sustainability issues.



*It is imperative that our suppliers make their best efforts to prioritize services that favor sustainability and energy efficiency, and that they work closely with their own supply chains to assess and mitigate environmental and sustainability issues.*

## 5. COMMITTED TO OUR EMPLOYEES

- Salary and Remuneration
- Occupational Health and Safety
- Training and Development
- Employment Practices
- Diversity, Inclusion and Equal opportunities



*At Cirion Technologies, people are at the heart of our progress. We are dedicated to fostering inclusive growth, empowering communities, and creating opportunities for all. Through our commitment to diversity, equity, and social responsibility, we strive to make a positive impact on the lives we touch and build a brighter future for our region.*

**Marcelo Melamed**

EVP, HUMAN RESOURCES

GRI 2-7; 405-1

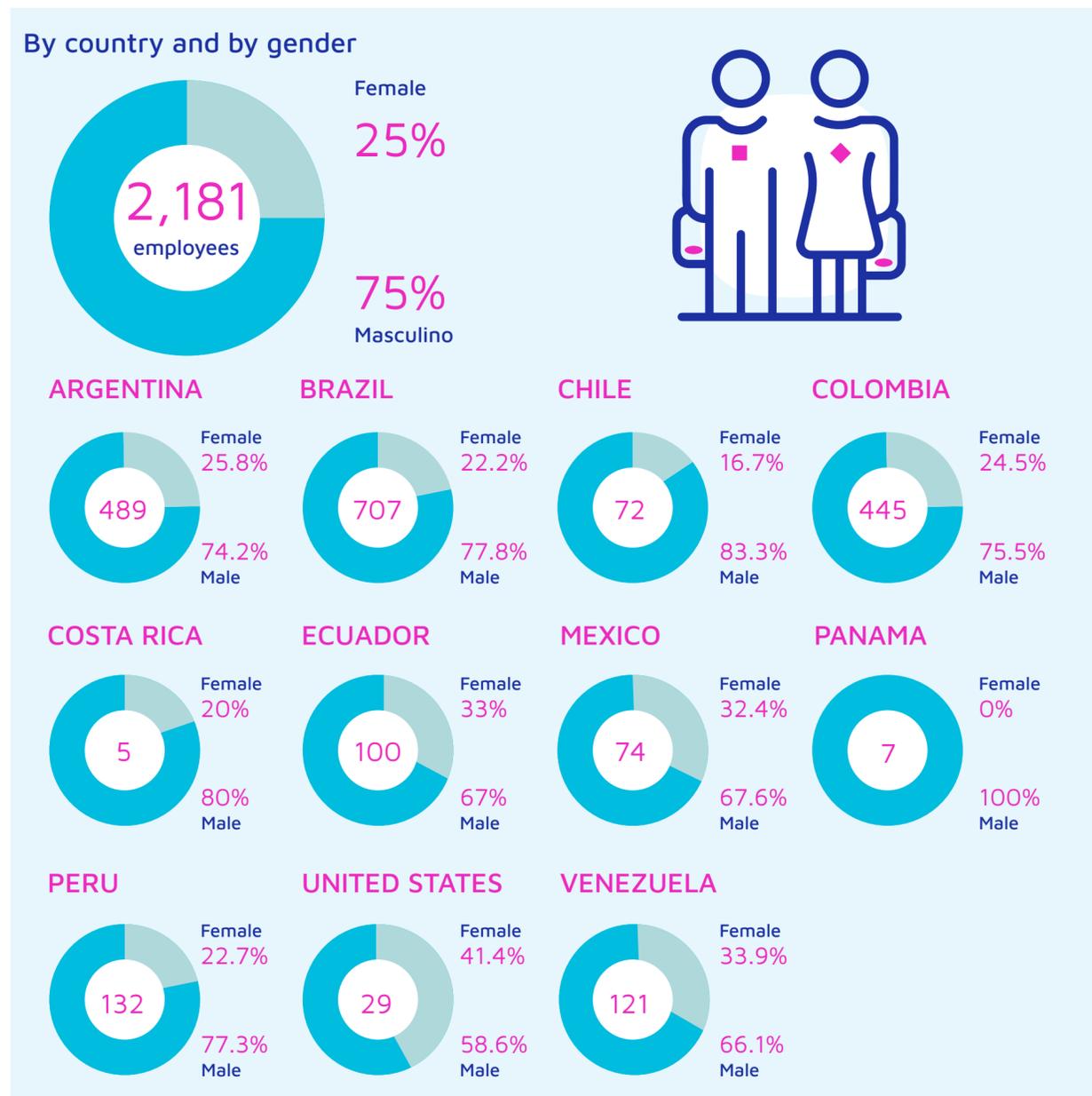
## 5. Committed to our employees

At Cirion, we consider our more than 2100 employees, spread across 11 countries, to be the central pillar of our business activity.

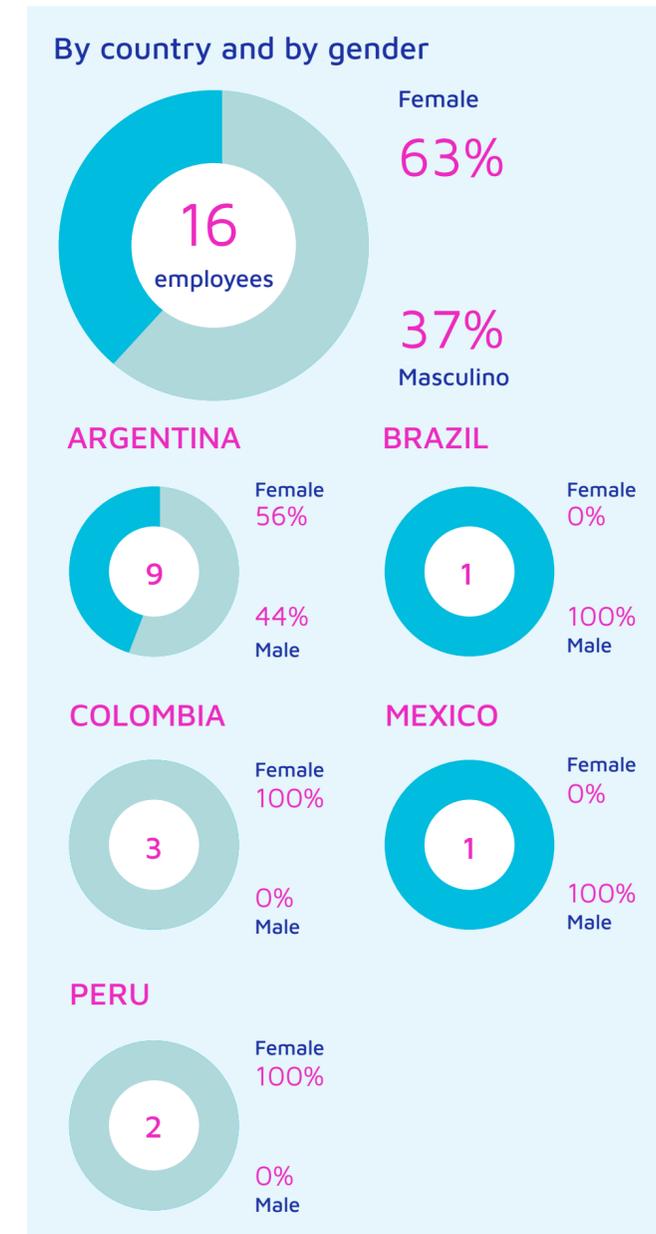
### POSITION ACCORDING TO GENDER IN THE COMPANY

Categories	% Female	% Male
CEO/President	0	100
VP	15.0	85.0
Director	17.6	82.4
MGR	17.6	82.4
Team Lead	24.1	75.9
Individual Contributor	26.4	73.6
Intern	62.5	37.5

### FULL-TIME PERMANENT EMPLOYEES



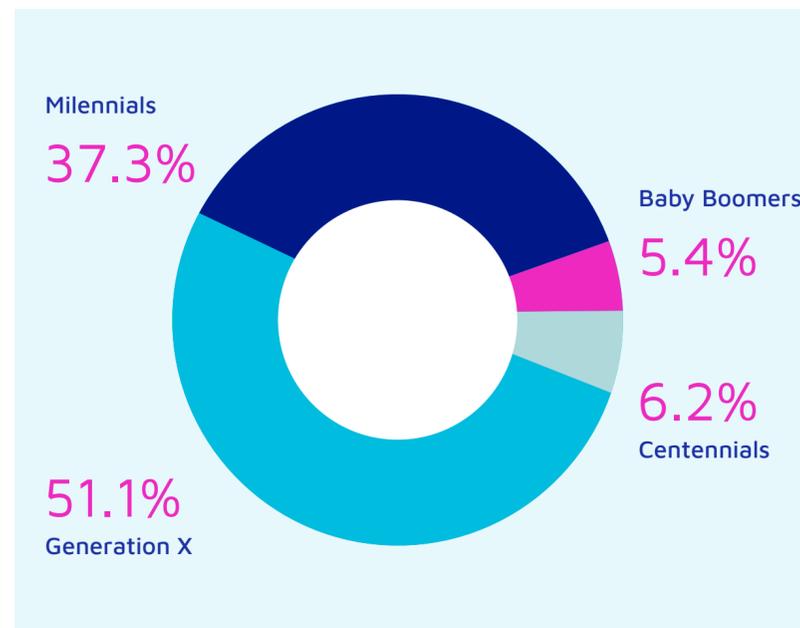
### PART-TIME EMPLOYEES



GRI 2-7 405-1

## 5. Committed to our employees

### % OF PEOPLE WITHIN THE GOVERNING BODIES



### COLLABORATORS BY GENERATION

ARGENTINA		BRAZIL		CHILE		COLOMBIA		COSTA RICA		ECUADOR		MEXICO		PANAMA		PERU		USA		VENEZUELA	
Generation	%	Generation	%	Generation	%	Generation	%	Generation	%	Generation	%	Generation	%	Generation	%	Generation	%	Generation	%	Generation	%
Baby Boomers	9.5	Baby Boomers	4.1	Baby Boomers	9.7	Baby Boomers	1.1	Baby Boomers	40	Baby Boomers	3	Baby Boomers	6.7	Baby Boomers	28.6	Baby Boomers	5.2	Baby Boomers	6.9	Baby Boomers	8.3
Centennials	11.1	Centennials	5.5	Centennials	1.4	Centennials	5.8	Centennials	0	Centennials	2	Centennials	1.3	Centennials	14.3	Centennials	3.7	Centennials	0	Centennials	4.1
Generation X	45	Generation X	51.8	Generation X	58.3	Generation X	49.3	Generation X	40	Generation X	57	Generation X	64	Generation X	57.1	Generation X	56	Generation X	75.2	Generation X	49.6
Millennials	34.4	Millennials	38.6	Millennials	30.6	Millennials	43.8	Millennials	20	Millennials	38	Millennials	28	Millennials	0	Millennials	35.1	Millennials	17.2	Millennials	38

GRI 2-19; 2-20;

## 5.1 Committed to our employees

### Salary and Remuneration

**At Cirion, we apply a structured remuneration policy with salary scales defined by career level, function and professional discipline.**

We include **bonus objectives by hierarchical level to encourage the achievement of goals and value individual contribution.** Compensation varies according to performance and productivity, aligning with our strategic objectives.

In addition, we have a **variable compensation plan** for the sales and pre-sales teams, tied to the increase in monthly revenue and performance indicators, thus linking the remuneration to the sustained growth of the company.

**The Human Resources Department and the Compensation Committee, part of the company's Board of Directors, systematically and periodically review compensation.**

The Compensation Committee validates and determines the annual bonuses and establishes the compensation for the CEO and executives, in addition to being key in the approval of changes in the compensation structure.

**We ensure that employees' salary adjustments are approved by their managers and the executive team.**

To keep our remuneration policies competitive and fair, **we use external consultants who carry out comparative analysis with the market.**



*We offer bonuses by hierarchical level to incentivize the achievement of goals and value contributions. By adjusting compensation to performance in line with our strategic objectives.*

GRI 3-3; 403-1; 403-2; 403-8

## 5.2 Committed to our employees

### Occupational health and safety

**Our occupational health and safety management systems comply with local regulations and ISO 45001 standards.**

In 2023, **93% of our staff**, totaling 2020 employees in Peru, Chile, Argentina, Ecuador, Brazil, Colombia and Mexico, were covered by our management system.

The Leadership Team emphasizes the importance of workplace safety and environmental protection throughout our operations.

We approach occupational risk management with a detailed Hazard Identification and Risk Assessment (IPER) method, which involves:

- **Classify positions** by similar activities.
- **Identify tasks** of those responsible for processes.
- **Detect hazards and assess** associated risks.
- **Review existing controls.**
- **Analyze the probability and severity** of risks.
- **Assess present and residual risks** after applying additional controls.

We believe that the quality of a preventive health and safety system depends on the training of the personnel who manage the IPER matrices.

These are created by process managers and reviewed by the Joint Committee and health and safety specialists. IPER matrix controls are constantly monitored and reviewed at the monthly meetings of the Joint Panel to ensure their effectiveness and encourage improvements.

The Joint Committee, together with the health and safety team and supervisors, are the points of contact for employees to report detected risks and to investigate incidents, with the aim of identifying causes and applying corrective measures to prevent future events.



### Our Commitment

- **Promote proactive risk management** to prevent incidents and improve performance.
- **Offer annual training** in safety and control procedures.
- **Maintain a safe work environment** to prevent injuries and illnesses.
- **Involve employees and their representatives** in the integrated management system.
- **Use rigorous methodologies to monitor safety**, including risk assessment tools and inspection records.
- **Carry out external risk assessments** in occupational health and safety, with monthly supervision and follow-up of corrective actions by the Joint Committees and the Leadership Team.

GRI 403-9; 403-10

## 5.2 Committed to our employees

### Occupational health and safety

At Cirion, we **classify occupational hazards** as mechanical, locative, electrical, physical, chemical, psychosocial, biological, and ergonomic, and take preventive measures based on risk assessment.

**We have identified electrical hazards**, fires and falls, and **responded** with the installation of safety meshes, training, use of fireproof suits, automatic fire extinguishing systems, fire extinguishers, defibrillators and personal protective equipment.

In addition, **we carry out ergonomic inspections, medical follow-up, active breaks** and **safety talks**, communicated through our intranet.

**We have protocols to detect, assess and manage occupational health and safety risks**, applicable to all the operations of our employees, contractors, subcontractors and visitors under our supervision.



*In 2023, no serious injuries, fatalities, or occupational diseases were reported in Cirion.*

GRI 403-3; 403-6

## 5.2 Committed to our employees

### Occupational health and safety

At Cirion, we manage occupational health and safety services including:

- Emergency response and first aid.
- Health monitoring with regular medical exams.
- Registration and monitoring of occupational diseases and accidents.
- Scheduled occupational medical evaluations.
- Manual of medical procedures for assessing risks of occupational diseases.

We offer access to occupational health services and consultations with specialized doctors, while maintaining the confidentiality of employees' medical results.

**In 2023, we comply with all occupational health regulations.**

We are launching a new edition of the **Safety, Health and Environment Week at Cirion**, with virtual and face-to-face activities to reinforce knowledge in occupational health and safety.

The activities included **sports forums, development of emergency plans, and mental health and nutrition issues**, seeking to promote **environmental protection** practices and **prevention of accidents and occupational diseases**.

In addition, **our medical service providers ensure the well-being of employees**, complemented by voluntary health programs that include emergency medical care, outpatient evaluations, virological monitoring, and health and immunization campaigns.



*The Safety, Health and Environment Week offered virtual and face-to-face activities, such as sports forums and mental health, to promote environmental protection and the prevention of accidents and occupational diseases.*

GRI 403-4; 403-5

## 5.2 Committed to our employees

### Occupational health and safety

At Cirion, we foster a culture of occupational health and safety that involves the active participation of our employees in all stages of the management system, from planning to the identification of improvements. We encourage risk communication and feedback through:

- Participation in the **Annual Training Plan in Occupational Safety and Health**.
- **Access to relevant information** to empower employees in their safety.
- **Overcoming barriers to effective participation** in these processes.

The **Joint Committee on Occupational Safety and Health**, with monthly meetings and representatives of employees and management, promotes collaborative decision-making.



*With Health and Safety Committees in Latin America, including Venezuela and Mexico in 2023, Cirion reaffirms its commitment to the well-being of its employees.*

**Cirion's Training Plans** aim to train personnel in the **identification and management of occupational health and safety risks**, increasing understanding of the causes of occupational illnesses and injuries to encourage preventive strategies.

The development of the training is based on an analysis of training needs, in collaboration with representatives of the employees and the occupational health department.

#### Key topics include:

**Ergonomics** to optimize the work environment and prevent injuries.

- **Knowledge of occupational health and safety legislation.**
- **Use of fire extinguishers** for fire response.
- **Prevention** of electrical risks.
- **First aid** for immediate response to accidents.
- **Emergency response plan** for organized action.
- **Security** in the use of tools to reduce accidents.
- **Safety protocols** for high-risk jobs and employee protection.

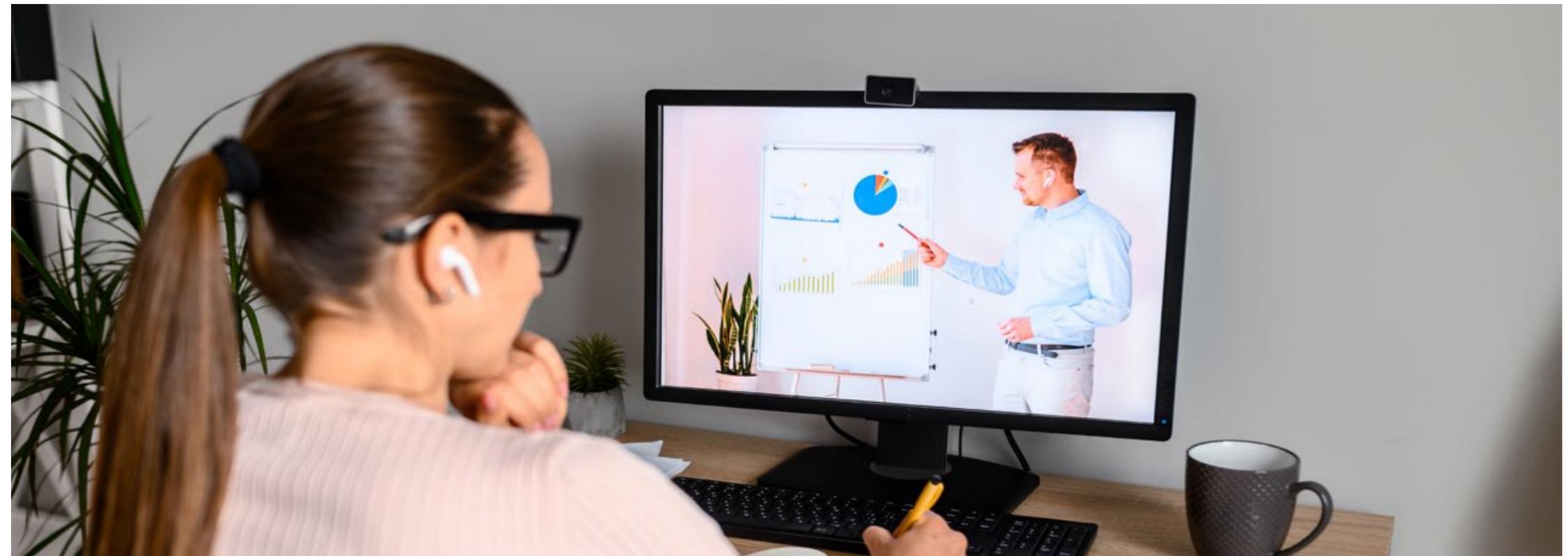
GRI 3-3; 404-1; 404-2; 404-3

## 5.3 Committed to our employee Training and Development

Cirion is committed to the development of its employees, offering training programs for professional growth. In 2023, initiatives such as:

- **Education Assistance Program:** Advanced training for the professional and academic development of employees.
- **Breaking the Digital Divide:** Training in digital marketing, data analysis, database management and programming to prepare employees for the future of work.
- **Technical Training:** Technical training on platforms and tools from leading companies to maintain technical competence and operational excellence.

In addition, Cirion participates in community activities, such as "Cirion+Empujar", which provides young people from vulnerable neighborhoods with their first work experience and the opportunity to obtain a permanent position, strengthening the relationship with the community and creating opportunities for personal growth.



*100% of employees, regardless of hierarchy or gender, receive periodic performance evaluations.*

### AVERAGE TRAINING HOURS IN 2023



**14 hours**

AVERAGE HOURS OF TRAINING

**13 hours**

AVERAGE EMPLOYEE

**15 hours**

AVERAGE FEMALE EMPLOYEES

### BASED ON THE CATEGORY OF THE EMPLOYEES

**10 hours**

INDIVIDUAL

**27.2 hours**

TEAM LEADER

**32.7 hours**

MANAGERS

**38.7 hours**

DIRECTORS

**19.9 hours**

INDIVIDUAL

GRI 404-1; 404-2; 404-3

## 5.3 Committed to our employees

### Training and Development

At Cirion, the **Employee Engagement Survey (EES)** is key to collecting feedback from our employees and guiding training strategies. It is carried out biannually and its results are shared with relevant metrics. Data for 2023 shows:

- Average employee NPS of 42.6%.
- Average overall satisfaction of 84%.
- Average participation of 81% of employees.

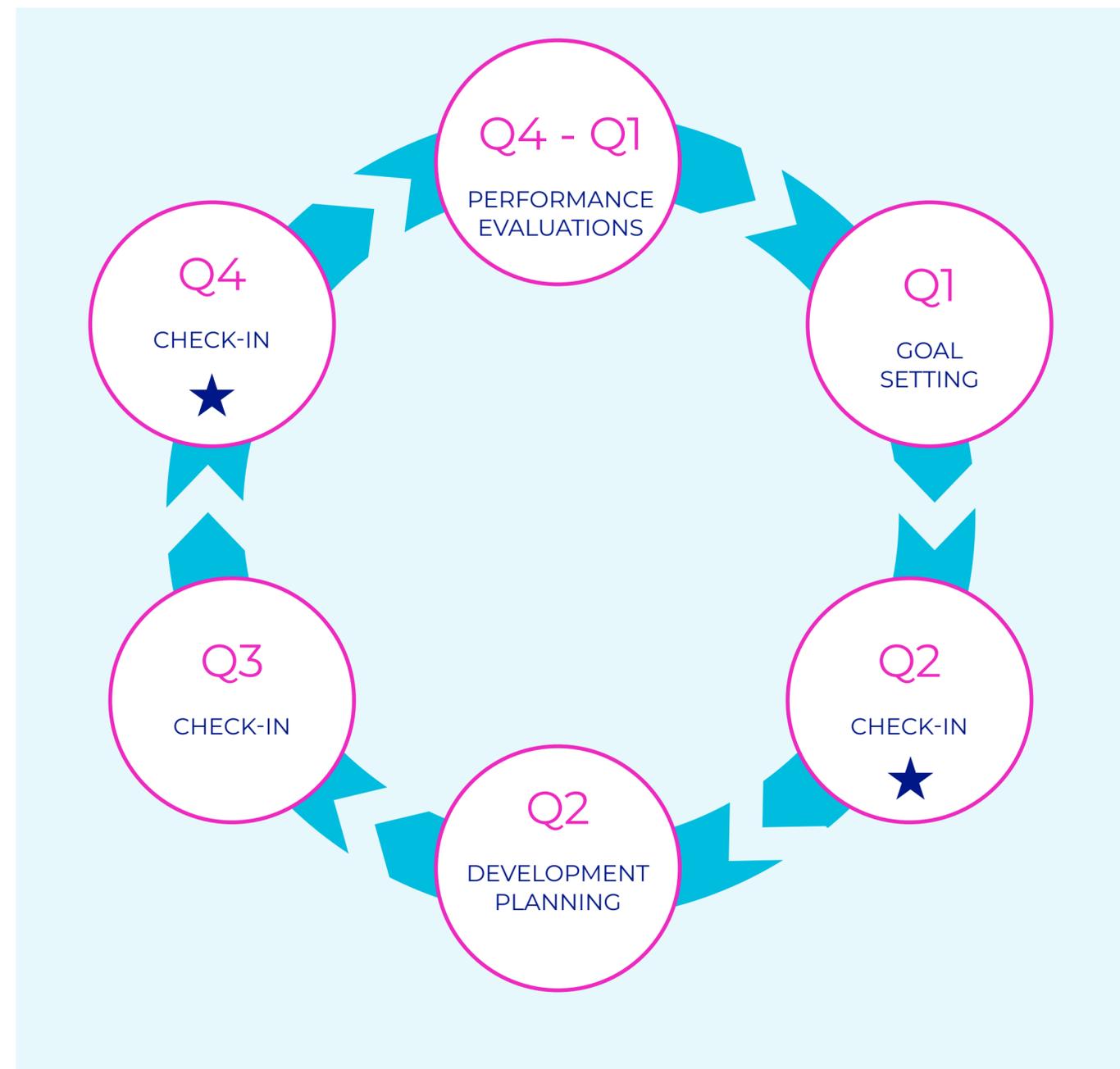
We conduct **regular performance evaluations** based on feedback conversations to support individual development and company growth.

In addition, the **"Low Performers" program** provides biannual feedback, with action plans to improve performance based on the evaluations of leaders by their teams. Local HR teams provide necessary support in this process.

For performance evaluations, at Cirion we **adopt a continuous improvement approach**, convinced that they allow us to measure and analyze the contribution of employees to the company's objectives, quality standards, corporate values and expected behaviors. Evaluations are structured in several key stages.



#### CONTINUOUS IMPROVEMENT APPROACH



GRI 404-2

## 5.3 Committed to our partners

### Training and Development

At Cirion, we **promote professional growth and leadership through Leadership and Development programs**, which support employees in their careers.

**These programs reinforce our commitment to excellence and continuous development**, preparing our partners to lead in a dynamic market.

- **Internship/Young Talent Programs:** For college students with potential.
- **Young Talent:** Development of interpersonal skills for the young workforce.
- **Cirion Onboarding:** Gaming tool for effective onboarding of new employees.
- **Aspire to Lead:** Resources for supervisors and future managers on their path to leadership.
- **Leadership Essentials:** Management training in leadership, business acumen and talent nurturing.
- **Leadership Experience:** Simulations for senior managers that improve leadership skills.
- **Continuous Talent Development:** Framework for the development of high-potential employees and key talents.
- **Mentoring Program:** Mentoring to inspire and guide employees in their career goals.
- **Young Talent Counseling:** Dialogue and reverse mentoring for new generations.
- **Low Performers:** Follow-up and feedback to improve employee performance.



GRI 3-3; 401-1; 401-2;

## 5.4 Committed to our employees Employment Practices

**We focus on motivating and retaining our talents, creating a welcoming and inclusive work environment.**

We prioritize the well-being of employees, promoting skills development and diversity, with special emphasis on increasing women in key leadership roles.

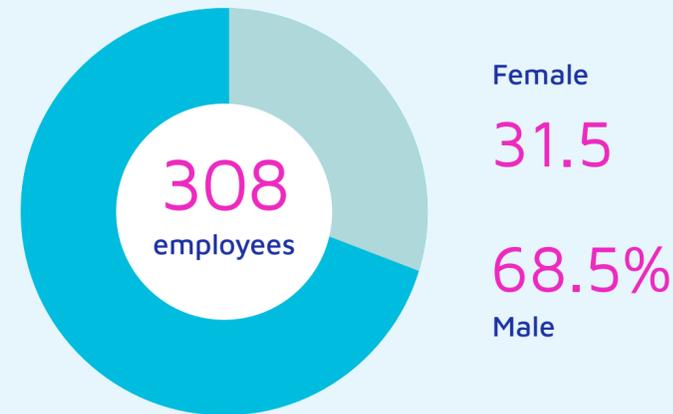
We implement practices such as **Reverse Mentoring**, where young employees guide veteran executives.

These mentors, selected for their experience and proactivity, seek to instruct and advise their mentees, promoting the achievement of professional goals and the mutual enrichment of skills and knowledge.



### EMPLOYEES ADDED IN 2023

By country, by gender and age



#### ARGENTINA / 94

Generation	M	F
B Boomers	0	0
Centennials	19	19
Gen X	12	2
Millennials	25	17
Total	56	38

#### BRAZIL / 102

Generation	M	F
B Boomers	0	1
Centennials	12	2
Gen X	24	13
Millennials	39	11
Total	75	27

#### CHILE / 9

Generation	M	F
B Boomers	1	0
Centennials	1	0
Gen X	2	1
Millennials	4	0
Total	8	1

#### COLOMBIA / 66

Generation	M	F
B Boomers	0	0
Centennials	6	5
Gen X	12	4
Millennials	27	12
Total	45	21

#### ECUADOR / 6

Generation	M	F
B Boomers	0	0
Centennials	1	0
Gen X	0	1
Millennials	1	3
Total	2	4

#### MEXICO / 13

Generation	M	F
B Boomers	1	0
Centennials	1	0
Gen X	8	1
Millennials	0	2
Total	10	3

#### PERU / 11

Generation	M	F
B Boomers	1	0
Centennials	0	0
Gen X	2	2
Millennials	6	0
Total	9	2

#### USA / 3

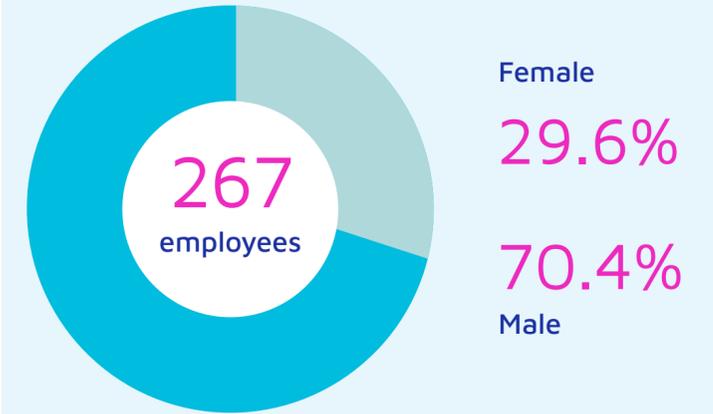
Generation	M	F
B Boomers	1	0
Centennials	0	0
Gen X	1	0
Millennials	1	0
Total	3	0

#### VENEZUELA / 4

Generation	M	F
B Boomers	0	0
Centennials	1	0
Gen X	1	0
Millennials	1	1
Total	3	1

### EMPLOYEES LEAVING THE COMPANY IN 2023

By country, by gender and age



#### ARGENTINA / 99

Generation	M	F
B Boomers	8	0
Centennials	15	12
Gen X	16	4
Millennials	30	14
Total	69	30

#### BRAZIL / 77

Generation	M	F
B Boomers	6	1
Centennials	1	5
Gen X	32	13
Millennials	14	5
Total	53	24

#### CHILE / 18

Generation	M	F
B Boomers	0	0
Centennials	1	0
Gen X	6	0
Millennials	9	2
Total	16	2

#### COLOMBIA / 47

Generation	M	F
B Boomers	4	1
Centennials	3	0
Gen X	13	6
Millennials	10	10
Total	30	17

#### ECUADOR / 5

Generation	M	F
B Boomers	0	0
Centennials	0	0
Gen X	0	0
Millennials	5	0
Total	5	0

#### MEXICO / 13

Generation	M	F
B Boomers	0	0
Centennials	0	0
Gen X	3	2
Millennials	5	3
Total	8	5

#### PANAMA / 1

Generation	M	F
B Boomers	0	0
Centennials	0	0
Gen X	0	0
Millennials	1	0
Total	1	0

#### PERU / 5

Generation	M	F
B Boomers	1	0
Centennials	0	1
Gen X	2	0
Millennials	1	0
Total	4	1

#### USA / 2

Generation	M	F
B Boomers	2	0
Centennials	0	0
Gen X	0	0
Millennials	0	0
Total	2	0

GRI 3-3;

## 5.5 Committed to our employees

### Diversity, Inclusion and Equal Opportunities

#### WORK OF EACH CIRCLE OF TRUST

 <p><b>Meeting 1</b> <b>Kick Off - August</b> Theoretical concepts on the value of Diversity, Equity and Inclusion and business value. <b>Presentation of the circles, facilitators invited to participate.</b> <b>General Audience</b></p>	 <p><b>Meeting 2</b> Key Concepts about DEI and Cultural Diversity / Sexual Diversity / Generations and Gender. <b>Definition of personal, organizational and social motivations for participation.</b> <b>Enrolled</b></p>	 <p><b>Meeting 3</b> Concepts about inclusive behaviors and microaggressions. <b>Definition of objectives and problems to be worked on.</b> <b>Enrolled</b></p>	 <p><b>Meeting 4</b> Prioritization of problems (Importance and Feasibility). <b>Definition of strategic lines of work and actions in the short, medium and long term.</b> <b>Enrolled</b></p>	 <p><b>Meeting 5</b> Preparation and validation of the Plan. <b>Definition and preparation for the presentation.</b> <b>Enrolled</b></p>	 <p><b>Meeting 6</b> <b>Closing - December</b> Presentation of all the Circles, their Plan with Goals, objectives and proposed activities. <b>Call to form the ERGs (Employee Resource Groups) for each topic.</b> <b>General Audience</b></p>
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At Cirion, diversity and inclusive leadership are essential to creating an environment of belonging and empowerment, free from discrimination, harassment, and retaliation.

In 2023, we have launched initiatives to promote diversity and collaborative teamwork:

**1) Circles of trust:** Safe Spaces for Development in Diversity, Equity and Inclusion (DEI), with 80 participants in 4 circles on Cultural, Sexual, Generational and Gender Diversity. Six meetings were held per circle, culminating in the presentation of action plans open to the entire company, with support from the Nodos Consulting firm in DEI.

**2) Reverse Mentoring Program:** In its first edition, young talents guided

company leaders, including 11 Vice Presidents and our CEO. The 24 young "mentors" exceeded expectations in performance, significantly impacting our business practices.

**3) Human Rights Campaign Certification:** Our Diversity and Inclusion Program earned us the certification of the Human Rights Campaign in Argentina, standing out as a prominent employer for the LGBT community.

## 6. COMMITTED TO THE ENVIRONMENT

- Energy efficiency and renewable energies
- Gas emissions, air quality and carbon footprint
- Waste management, co-processing and circular economy



*At Cirion Technologies, we are committed to reducing our environmental footprint by driving down emissions and increasing the use of renewable energy in our data centers. Through innovative energy efficiency measures and sustainable practices, we are not only powering Latin America's digital transformation but also advancing a greener, more resilient future for the planet.*

**Nelson Fonseca**

PRESIDENT DATA CENTER

GRI 3-3

## 6.1 Committed to the environment

### Energy efficiency and renewable energies

Cirion has integrated sustainability as a fundamental pillar in its operations, focusing on reducing environmental impact, minimizing the consumption of natural resources and promoting sustainable practices. They have implemented measures such as efficient energy management, the purchase of renewable energy, waste reduction and the adoption of eco-efficient technologies. Along their sustainability journey, they have delivered significant results, faced challenges, and learned valuable lessons, with a commitment to continue improving and building a greener operation.

Since 2022 we began to execute our renewable energy acquisition strategy through contractual instruments that agree on energy attribute certificates (RECs) for our data centers located in Brazil and Chile, **during 2023 we managed to include within this strategy the data centers of Peru and Colombia**, so we can affirm that 100% of our DCs located in these 4 countries operate under a 100 RE scheme.

We intend to continue expanding this strategy to our other locations, covering our fiber network (nodes and landing stations), knowing and understanding the opportunities that the energy markets can offer us, as we initially mentioned. Similarly, as part of the strategy, at Cirion we set the commitment that each new data center that comes into operation will do so under a 100% renewable energy scheme. This with the aim of continuing to add and expand our goal of moving towards low and/or zero carbon energy, of continuing to add and expand our goal of moving towards low and/or zero carbon energy.

Since 2023, Cirion has been using the **Resource Advisor** tool to automate energy consumption monitoring and calculate emissions, we have also improved operating procedures and refined monitoring systems, including the implementation of a Data Center Infrastructure Management (DCIM) system, to optimize data collection.

We have achieved energy efficiency indices (PUE) below 1.5 in modernized areas, demonstrating our commitment to efficiency and sustainability.

Our measures to prevent and mitigate the impacts of energy consumption include:

- Projects with regulations to lower emissions, LED lighting and automatic shutdown systems.
- Environmental impact assessments and risk analysis in new energy projects.
- Energy management standards and procedures that promote efficiency and sustainability.
- Continuous training in energy saving and responsible use of resources.
- Sustainability reporting to disseminate results and promote transparency.
- Advanced technologies and monitoring systems to monitor energy usage in real-time.
- Contingency plans for energy emergencies or infrastructure failures.

In addition, we initiate supplier impact studies to minimize the supply chain footprint and collaborate with clean energy suppliers that comply with environmental standards. We expanded the purchase of RE100 or IREC certified energy to Colombia and Peru, joining Brazil and Chile since 2022. We also signed solar energy contracts for the 4 Nodes in Brazil, generating an estimate of 1GWh/year.

*In 2023, Cirion invest \$6 million in upgrading HVAC systems and in the initial phase of a DCIM.*

*We began the reconversion towards sustainable practices at the regional level, standardizing processes and training operational personnel. Changes in refrigeration equipment continued to include new Direct Expansion Free Cooling equipment, as well as new technology equipment with variable speed fans and Digital Scroll compressors. In the same way, 17 R-22 refrigerant gas consumption equipment was replaced by R-410A, R-134A and R-407C refrigerants.*

GRI 302-1

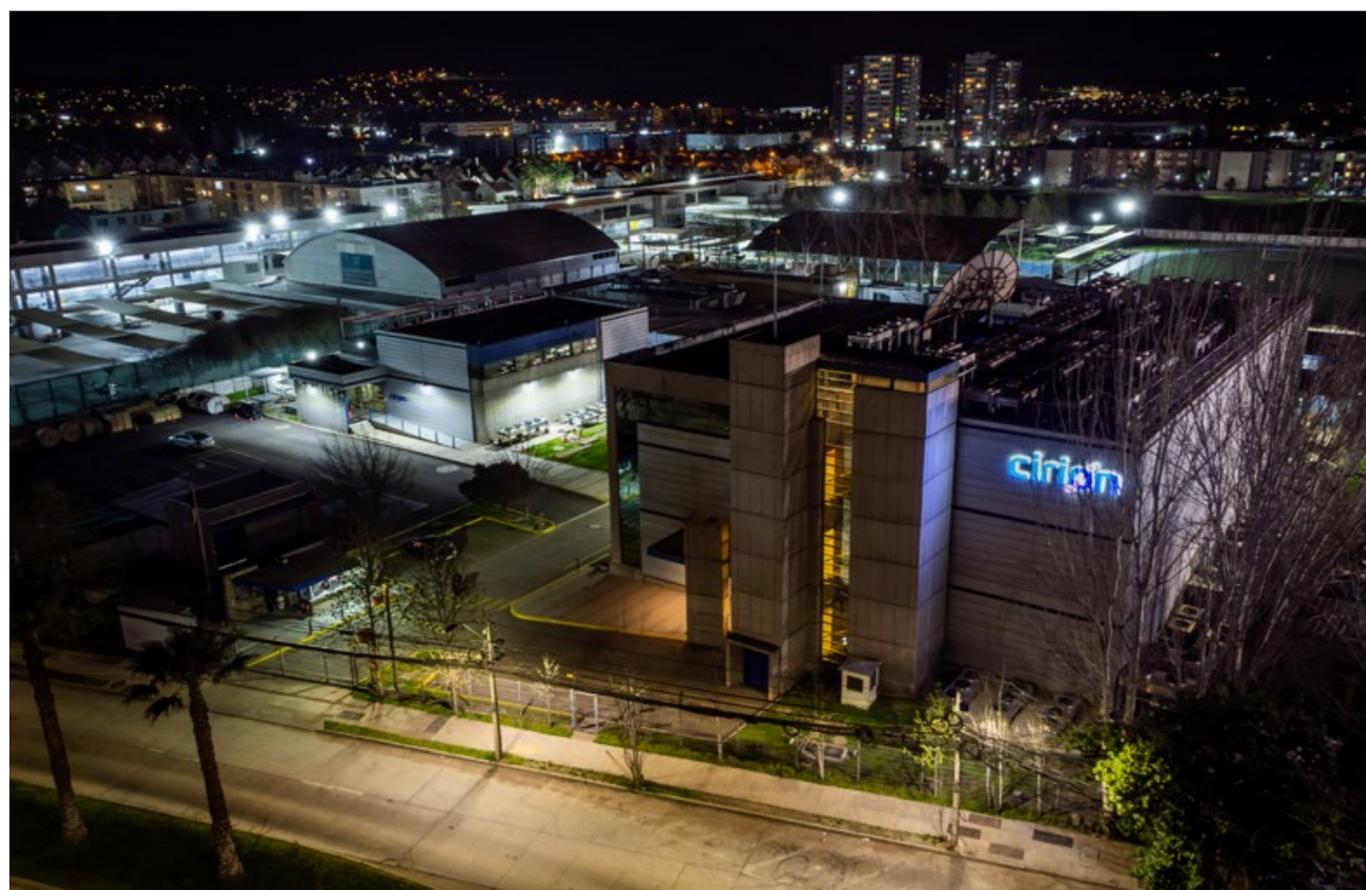
## 6.1 Committed to the environment

### Energy efficiency and renewable energies

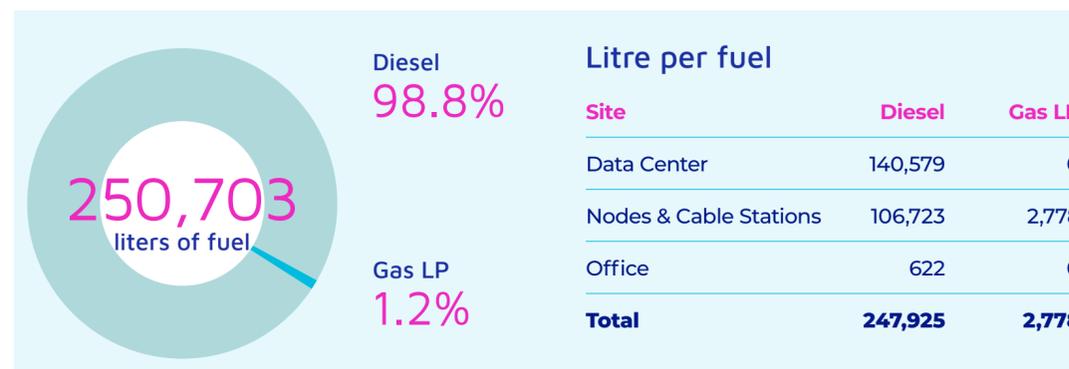
#### Scope 1

In 2023, we recorded a cumulative consumption of 12,576.14 GJ of non-renewable fuels such as diesel and diesel, while the use of renewable fuels, such as LPG and ethanol, was 107.4 GJ.

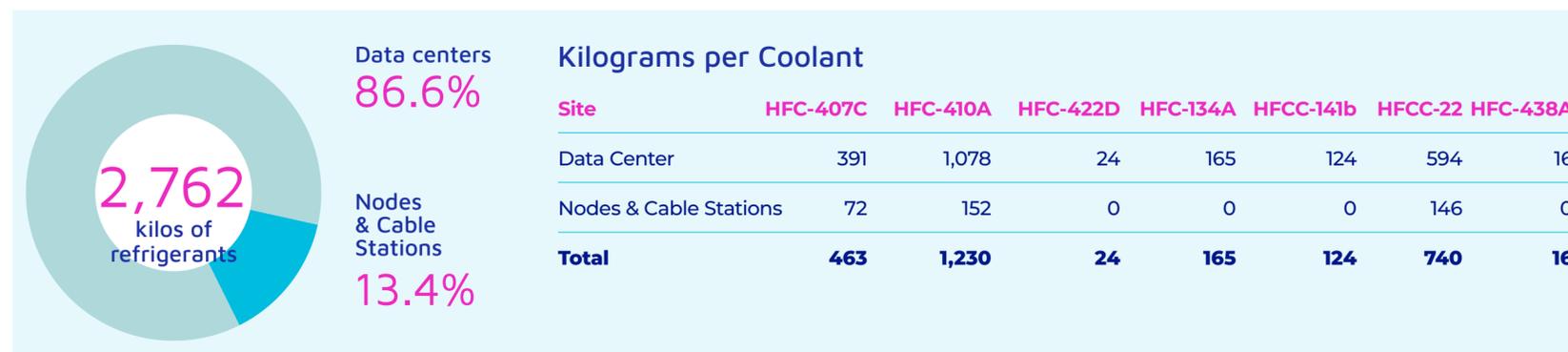
To assess the impact of fuel consumption, we use emission factors from various sources, including entities such as CAMMESA, the National Energy Commission of Chile, the IPCC in its AR6 - 100-year horizon, and the IEA.



#### STATIONARY COMBUSTION



*Aware of the climate emergency, we promote a model focused on decarbonization, energy efficiency and renewable energies.*



#### MOBILE COMBUSTION



GRI 302-1

## 6.1 Committed to the environment

### Energy efficiency and renewable energies

#### Scope 2

The company's total energy consumption in 2023 was 825,833.20 GJ, with an electricity consumption of 225,874,872.53 kWh.

Of the total electricity purchased, 62% corresponds to renewable sources.\*

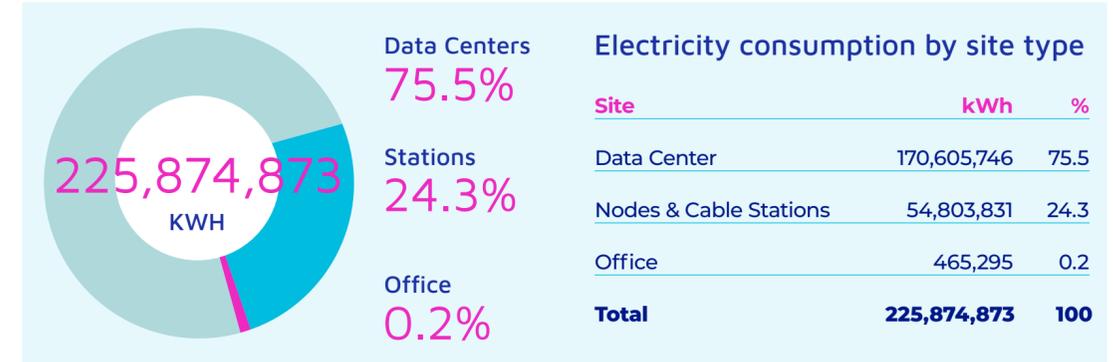


*Cirion has been using the Resource Advisor tool to automate the survey since 2023 of energy consumption and calculate emissions.*

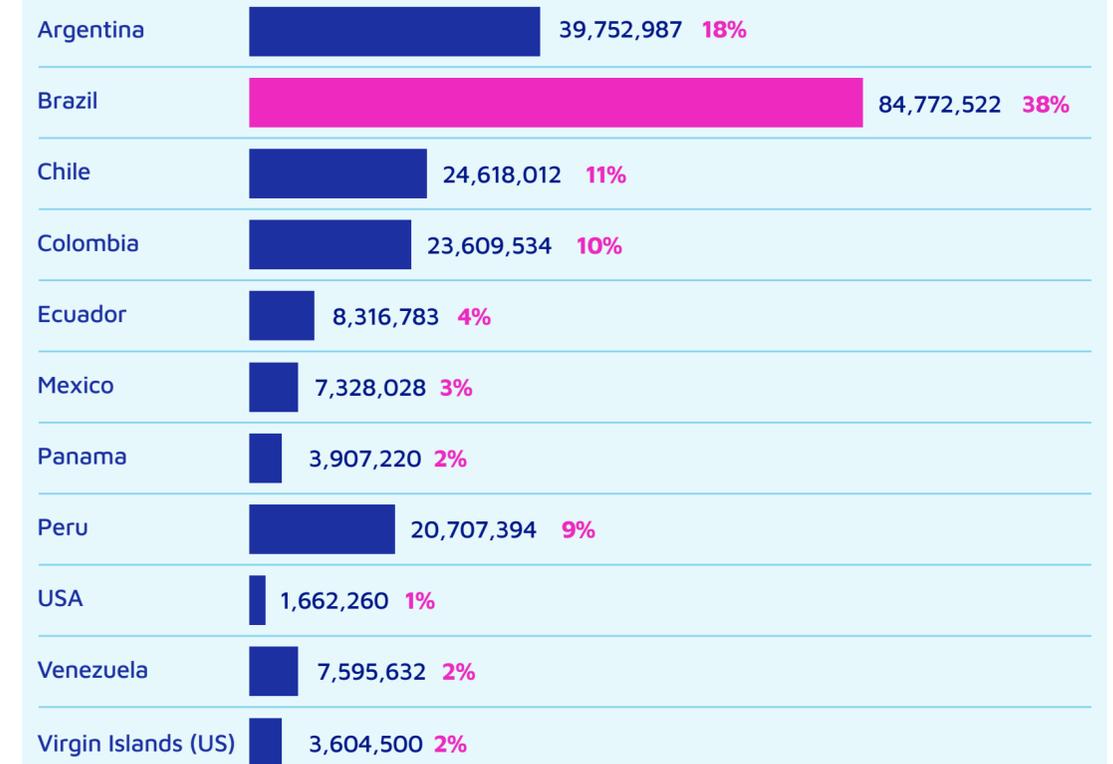


\*IREC renewable energy certificates were purchased in Brazil, Chile, Colombia and Peru for 100% of the energy consumed by data centers located in those countries, and for a percentage of the energy consumed by nodes and landing stations in Brazil and Colombia.

#### ELECTRICITY CONSUMPTION



#### Electricity consumption by country



GRI 302-1; 302-2; 302-3

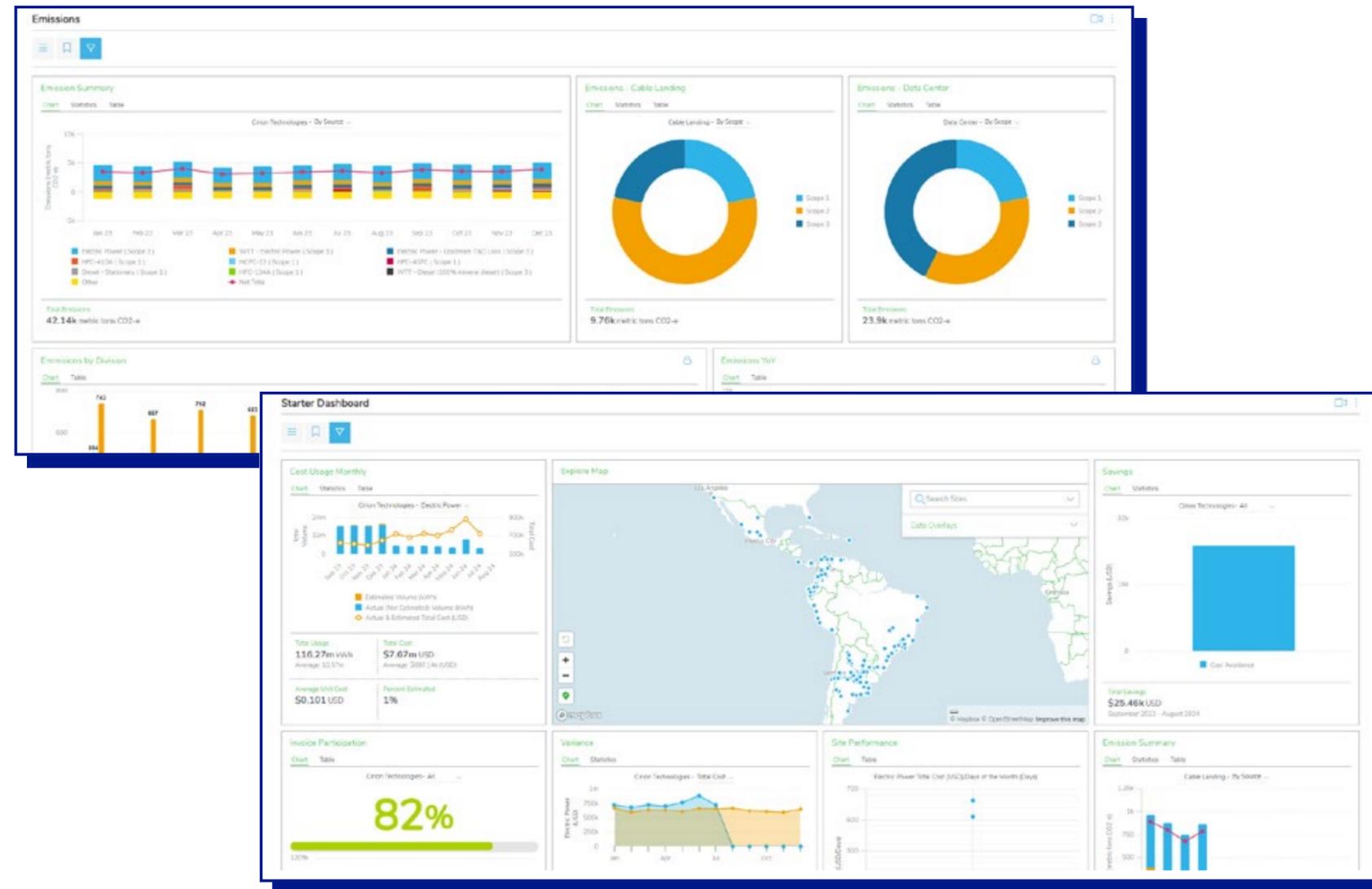
## 6.2 Committed to the environment

### Gas emissions, air quality and carbon footprint

As part of the management that we must achieve to advance in our decarbonization path, we are aware of the importance of measuring our **Greenhouse Gas (GHG)** Footprint, as this is the basis that allows us to identify which areas for improvement and also understand which are the initiatives that most influence our emissions management.

That said, **since 2022 we began measuring our footprint for scopes 1 and 2**, representing great challenges in terms of information collection and consolidation. This factor led us to implement one of our first actions focused on the continuous improvement of inventory quality and data management, through the implementation of the **Resource Advisor (RA) software**.

This Software, allowed us to centralize, digitize and automate data management, facilitating the calculation of our emissions inventory in real time, reducing the time spent on its calculation and reducing sources of inaccuracy found in the first inventory.



GRI 305-1; 305-2; 305-3

## 6.2 Committed to the environment

### Gas emissions, air quality and carbon footprint



#### Greenhouse gases

In 2023, direct greenhouse gas (GHG) emissions included in Scope 1 were of 19,044.90 tCOeq, including CO2 and HFC.



#### Emissions Year over Year

For Scope 2, the value for emissions from energy consumption was 19,044.9 tCOeq.

#### Emissions by Range



#### Carbon emissions

Las emisiones biogénicas de CO2 se situaron en 2,365 tCOeq.

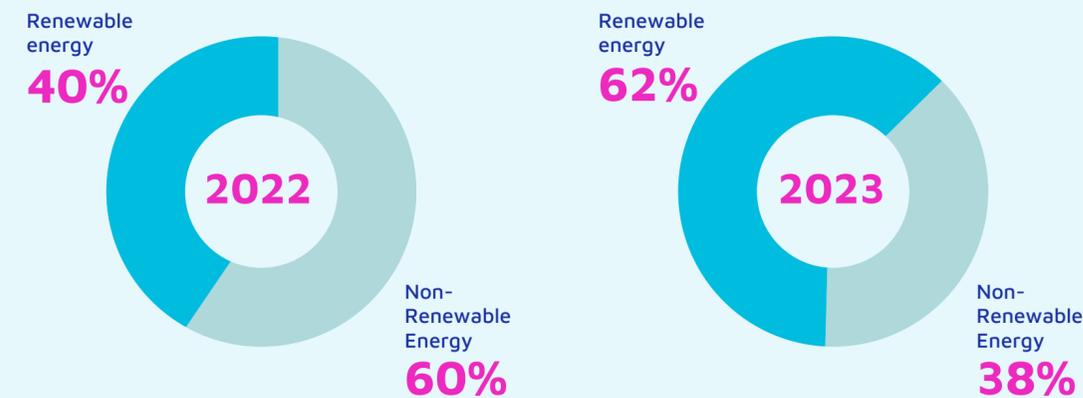


#### Renewable Energy Purchase

We expanded the purchase of RE100 or IREC certified energy to Colombia and Peru, joining Brazil and Chile since 2022.

We also signed solar energy contracts for the 4 Nodes in Brazil, generating an estimate of 1GWh/year.

#### Certified Power Purchase



\*Market-based emissions in tCOeq.

GRI 302-3

## 6.2 Committed to the environment

### Gas emissions, air quality and carbon footprint

Emission intensity is a key indicator that reflects the efficiency with which an organization uses energy in relation to its economic production.

By adopting the ratio of tons of CO<sub>2</sub>e per 100,000 USD of revenue, we are committed not only to reducing our emissions, but also to continuously improving our energy efficiency, even in the context of an expanding business.

This metric allows us to monitor our progress towards sustainable growth, demonstrating that it is possible to increase profitability while proportionately decreasing environmental impact.

#### EMISSION INTENSITY

	2022	2023
Scope 1 and 2 Emissions	33.282,86	27.483,16
Per 100.000 USD	⬆️ 3,90870	⬇️ 3,13155



*This metric allows us to demonstrate that it is possible while our growth accelerates, the environmental impact is proportionally reduced.*

GRI 302-1 ; 305-1; 305-2; 305-3

## 6.2 Committed to the environment

### Gas emissions, air quality and carbon footprint

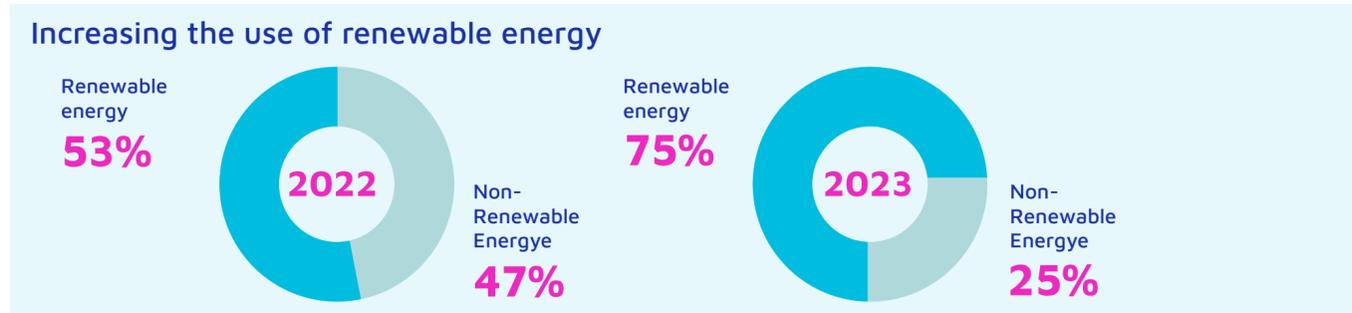
#### Data Centers

In addition to the global results presented above, **we want to focus especially on the behavior of the emissions generated in our Data Centers**, considering the interest of our stakeholders in the progress we have been developing in improving their efficiency.

As part of our ongoing commitment to sustainability and decarbonization, we implement effective strategies in our data centers. **We have achieved a reduction in fossil fuel consumption, reaffirming our focus on the acquisition of renewable energy alternatives.**

**These actions reflect our commitment to innovation and environmental responsibility in our operations.**

#### DATA CENTER CONSUMPTION EVOLUTION



#### CONSUMPTION EVOLUTION

Scope	Tip	UOM	2022	2023	YOY%
Scope 1	Fuels	Litres	232,587	145,277	-37.5
Scope 1	Refrigerants	kilogramos	2,793	2,391	-14.4
Scope 2	Electric Power Total	kWh	160,491,482	170,605,746	6.3
Scope 2	Renewable Energy	kWh	84,784,849	127,290,026	50.1

#### ENERGY SOURCES SCOPE 1 AND 2



Market-based emissions in tCO<sub>2</sub>eq.

*In 2023, the use of renewable energy in our facilities has experienced a notable increase, now representing 75% of our energy source, compared to the previous year.*

GRI 305-1; 305-2; 305-3

## 6.2 Committed to the environment

### Gas emissions, air quality and carbon footprint

#### Scope 3

Aware that for companies in the sector, emissions most predominant correspond to those in its value chain (Scope 3) **during 2023 and 2024 we carried out our first inventory of these emissions** in order to have the full overview of our emissions and start planning appropriate mitigation measures.

The purchase of goods and services and fixed assets represent the Scope 3 emissions and show the need for relationship with suppliers, while the other categories could represent early victories in the decarbonization.

Of all the applicable categories, capital goods and purchased goods and services are the most representative for Cirion. Consequently, alternatives are being evaluated to decarbonize our value chain through effective, verifiable, and scalable mechanisms that meet market needs and generate value for our suppliers and us.

#### GENERAL BALANCE MTONS CO2e

Purchase of Goods and Services	50,012.00	41.01%
Capital Goods	42,776.30	35.08%
Fuel and Energy-Related Activities not included in Scope 1 or 2	14,058.00	12.02%
Employee Commuting	5,193.42	4.26%
Upstream leased assets	3,539.27	2.90%
Downstream leased assets	3,101.40	2.54%
Business Travel	2,141.19	1.76%
Waste Generated in Operations	524.78	0.43%

Calculation methodology (base information used): 1) Expenses, 2) Activity data, 3) Hybrid modality (expenses and specific data).

*Within Scope 3, categories 1 and 2 are have identified as the main sources of issuances, constituting a significant 76.09% of the total contributions.*

GRI 3-3

## 6.2 Committed to the environment

### Gas emissions, air quality and carbon footprint

#### Scope 1, 2 & 3

To align our actions with the Sustainable Development Goals (SDGs) and advance in decarbonization, at Cirion we annually evaluate its carbon footprint, highlighting 2023 for the inclusion of scope 3 in the measurement.

As part of the ICT industry, the use of refrigerant gases and high energy consumption are inevitable, resulting in emissions.

We have implemented maintenance strategies to improve efficiency and highlight initiatives such as:

- **Refrigerant management:** Use of ecological refrigerants, regular maintenance and technological renewal with more reliable equipment. We monitor conversion to green refrigerants, retire old equipment, and reduce the use of non-green refrigerants.
- **Carbon footprint management:** Inspections and maintenance of air conditioning equipment to prevent gas and oil leaks. We continue with the measurement of emissions started in 2022, including power generation equipment, to comply with environmental regulations and objectives.
- **Air quality:** Compliance with local regulations in emissions of electric generators, periodic maintenance and conservation of equipment to ensure efficient and responsible operation.



#### CIRION GHG EMISSIONS BY RANGE



Our analysis reveals that scope 3 emissions represent the greatest relevance in terms of environmental impact.

In second place are the emissions that come from the company's energy consumption, included in Scope 2.

We strive to purchase energy that is certified from renewable sources, which contributes to reducing this impact significantly.

GRI 305-1; 305-2; 305-3

## 6.2 Committed to the environment

### Gas emissions, air quality and carbon footprint

**At Cirion, we calculate our carbon footprint in a solid way, including all our headquarters and technical centers in Argentina, Brazil, Chile, Colombia, Costa Rica, Ecuador, the USA, and the United States.**

We follow a methodology aligned with international regulations and standards such as the Paris Agreement, the United Nations Framework Convention on Climate Change, the U.S. EPA, the United Kingdom's Defra, and the Greenhouse Gas (GHG) Protocol, evaluating GHGs by location and market and using the GWPs of the IPCC's AR5.

Our analysis includes direct and indirect emissions, biogenic emissions and the purchase of renewable energy certificates (I-RECs), following the GHG Protocol's "Corporate Accounting and Reporting Standard" guide and the "GHG Protocol Scope 2 Guide" for Scope 2.

In addition, we consulted standards and methodologies from CAMMESA, the National Energy Commission of Chile, UPME, the Ministry of Energy and Mines of Ecuador, SEMARNAT of Mexico, the US Residual Mix (Green-e Energy Emissions Rates), the Ministry of Energy of Panama and the IEA.



GRI 305-4

## 6.2 Committed to the environment

### Gas emissions, air quality and carbon footprint

#### PROSPECTS FOR THE FUTURE

At Cirion we understand the importance of climate change at a global level and from our role as a company we are aware that there are risks and opportunities associated with it, which is why we will continue in the process of structuring our climate strategy based on business continuity, the mitigation of our emissions and working together with our stakeholders in order to have timely management. sustainable and viable that allows us to face the challenges that the climate variable may represent in the development of our activities, so in the coming years we will establish clearer decarbonization objectives, integrate the climate variable into our operations and seek the appropriate reporting frameworks for accountability.



GRI 3-3; 306-1

## 6.3 Committed to the environment

### Waste management, co-processing and circular economy

At Cirion, as part of the telecommunications sector, we produce various waste, including Waste Electrical and Electronic Equipment (WEEE), copper and fiber optic cables, as well as batteries and oils classified as hazardous.

We are committed to responsible management of the life cycle of our products, ensuring recovery and proper handling at the end of their useful life.

We assess the obsolescence of our equipment and process discarded equipment as scrap, following local regulations and with the help of certified carriers and operators.

We issue certificates that validate regulatory compliance after the recovery, recycling or proper disposal of waste.

During 2023, we processed 57.5 tons of materials and recovered functional equipment from uninstallations, reusing them after repair, which represented 38% of the equipment installed in the year, extending its useful life and reaffirming our sustainable management.



Below is the diagram that represents the process followed by the materials that are destined for recycling:

#### Recycling materials delivery process



GRI 3-3; 306-2

## 6.3 Committed to the environment

### Waste management, co-processing and circular economy

**At Cirion, we integrate circular economy principles into our operations to prevent and reduce waste generation and manage it responsibly**

We segregate our waste to reuse as resources, donating it to charities or delivering recyclable materials to authorized entities.

Waste is sorted and stored correctly, and we work with specialized operators for proper treatment. For municipal waste, we use local services, and for hazardous waste, we collaborate with specialized companies.

The Real Estate and EHS department records the volumes of all waste removed, ensuring compliance with government regulations.

In addition, we implemented corporate measures to improve waste management at Cirion::

- **Awareness programs to promote the reduction and reuse of waste among employees.**
- **Evaluation of products and services according to their environmental impact and disposal costs.**
- **Reduction of unnecessary printing and photocopying.**
- **Promotion of the use of digital documents.**
- **Decrease in the use of bags and packaging.**



*We embrace the circular economy to address waste management challenges and their impacts.*

## 7. COMMITTED TO THE COMMUNITY

- Community relations



*At Cirion Technologies, we believe in the power of community. By building strong partnerships and supporting local initiatives, we are committed to making a lasting impact in the regions where we operate.*

**Cintia Fernandez**

DIR HUMAN RESOURCES

GRI 413-1

## 7. Committed to the Community

### Community Relations

At Cirion, we are committed to supporting various social and educational initiatives in Argentina, Brazil, Chile, Colombia, Ecuador, Peru and Venezuela:

#### Argentina

- **Fundación Empujar:** We incorporated 5 young people through the "First Employment" program.
- **Ronald McDonald House:** Proud sponsors of their annual charity dinner.
- **Di Tella University:** We participated in the fundraising dinner for university scholarships.
- **Tomás Reggio Health Center:** We donated 10 advanced access points to improve its network infrastructure and medical service.
- **UNICEF Career:** A team of 40 employees participated in the race to support education through UNICEF.

#### Brazil

- **Maria Carolina Foundation:** We contributed US\$16,000 to promote progress and social cohesion.
- **City of Cotia's Municipal Fund for Child Welfare Support:** We donated US\$24,000 to the children's support fund.
- **Jovem Aprendiz (Young Intern) Program -CIEE-:**
- **We participate in the Employment Program,** facilitating the transition of young people to job opportunities.

#### Chile:

- **Amigos por un Sueño Foundation:** At Christmas, we donate school supplies for children undergoing cancer treatment, including materials for their learning and creativity.
- **Park Kindergarten:** We collaborate in the renovation of the recreational and educational space, improving the play area and greenhouse, and teaching children about growing vegetables in a renovated environment.

#### Colombia

- **Fundación United Way Colombia:** We implemented a voluntary salary donation program to support teacher education and development in low-income schools.
- **Professional Experience "A Day in the Life of":** We offered 25 high school students a day of technological immersion, including a visit to a Data Center.
- **Book Donation Campaign:** Our employees donated 1,746 books, benefiting 402 children and adolescents in various foundations

#### Ecuador

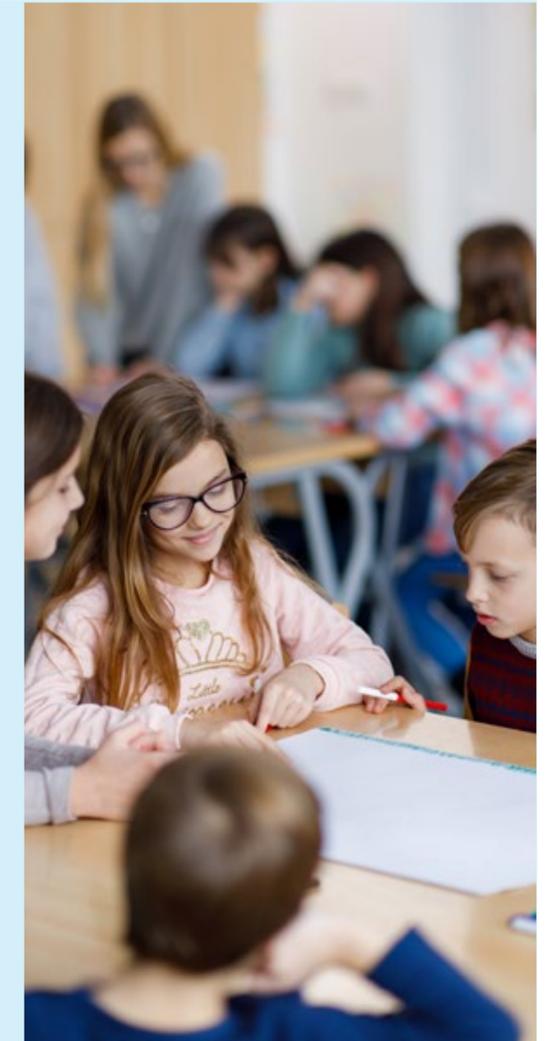
- **United for Education:** We installed a satellite internet antenna at the Eloy Alfaro Educational Institute, benefiting 20 students and 2 teachers.

#### Peru

- **Aprendo contigo:** We sponsor the "IV Aprendo Contigo Cup" of golf, supporting the education of sick children and donating prizes for the champions.
- **Aldeas Infantiles SOS:** We participated in the collection of paper to support the nutrition of 2,000 children, collecting 1,293.45 kg of paper and cardboard in 2023.

#### Venezuela

- **Senos Ayuda:** We support the annual breast cancer awareness run and walk.
- **Casa Hogar Domingo Savio (San Juan Bosco):** We collaborate in the creation of a sustainable garden.
- **Fundación Jacinto Convit:** We provide Internet services and hosting for cancer vaccine research.
- **Teletón Regional:** We participated in a Telethon to support NGOs fighting cancer in Latin America.
- **Cavedatos:** We donated 3 laptops to boost education and access to information.



GRI 3-3

# 7. Committed to the Community

## Community Relations

At Cirion we recognize our impact on the local community.

Below, we present both the risks, and the control measures we have carried out on each of them.



Description of the negative impact



Initiatives to mitigate risk

Potential complaints from nearby residents due to noise generated by the operation of electric generators.

➤ Installation of soundproofing systems in electrical generators' rooms. Implementation of regular environmental noise measurements to ensure compliance with current regulations.

Complaints from neighbors and pedestrians about the trenching and laying of conduits in the streets.

➤ Licensing and approvals from the local authority. Consider the purchase of used machinery for the External Plant that generates less noise pollution. Conduct noise level and air quality assessments.

Complaints from the local population about the alleged emission of radiation by established telecommunications antennas.

➤ Purchase of certified supplies and products in the field of telecommunications, which ensure that their transmitting devices and antennas do not exceed the maximum permitted limit of radiation, based on the tests carried out on their equipment. Non-ionizing radiation evaluations.

Complaints from the communities about the possible leakage and leakage of underground oil that supplies the electric generators.

➤ Telemetry systems designed for fuel level monitoring and the implementation of instant alerts that allow the detection of leaks and the execution of corrective actions immediately.

Throughout the year 2023, we did not receive any complaints from the communities surrounding our operations. This marks a significant improvement compared to the previous year.



## 8. ANNEXES

- **GRI Indicator Table**
- **Scope 1 Emission Factors**
- **Scope 2 Emission Factors**
- **Scope 3 Emission Factors**

*Committed to the  
Responsible growth.*

## GRI Indicator Table

CONTENT TITLE		LINK TO CONTENT	CHOICE	OMISSION	CHAPTER
<b>GRI 2: General Contents 2023</b>					
<b>THE ORGANIZATION AND ITS REPORTING PRACTICES</b>					
2-1	Organizational Details	Pages 6,7,8,9			1. Presentation
2-2	Entities included in sustainability reporting	Page 5			1. Presentation
2-3	Reporting period, frequency, and touchpoint	Page 5			1. Presentation
2-4	Updating Information	Pages 46, 51	The values corresponding to the following are updated: 302-1: 213.061.451,82 kWh 305-1: 7.902,94 mtons CO2e 305-2: 34.954,78 mtons CO2e		
2-5	External verification			The sustainability report is not externally verified	
<b>ACTIVITIES AND WORKERS</b>					
2-6	Activities, value chain and other business relationships	Page 9			1. Presentation
2-7	Employees	Pages 33, 34, 43			5. Committed to our collaborators
2-8	Non-Employee Workers			Incomplete or not available information. We decided not to report about contractors given the difficulties to ensure quality of information due to the broad range of service providers. At the same time, since this is our first ESG report, we defined to focus on internal data, working on information consistency and lay the foundations for future reports.	
<b>GOVERNANCE</b>					
2-9	Governance structure and composition	Pages 17, 18			3. Committed to our governance
2-10	Appointment and selection of the highest governing body			Incomplete or not available information: Shareholders have not set the format selection criteria, for now.	
2-11	President of the highest governing body	Page 17			3. Committed to our governance
2-12	Role of the highest governing body in the supervision of impact management	Page 13			3. Committed to our governance
2-13	Delegation of responsibility for impact management	Page 18			3. Committed to our governance
2-14	Role of the highest governing body in the presentation sustainability reporting	Page 18			3. Committed to our governance

CONTENT TITLE	LINK TO CONTENT	CHOICE	OMISSION	CHAPTER
2-15	Conflicts of interest	Pages 19, 21, 24		3. Committed to our governance
2-16	Communicating critical concerns	Page 19		3. Committed to our governance
2-17	Collective knowledge of the highest governing body	Pages 14, 15, 18		3. Committed to our governance
2-18	Performance evaluation of the highest governing body		Incomplete or not available information: Board assessments are not contemplated for now, and neither is establishing their mandatory nature.	
2-19	Remuneration policies	Page 35		5. Committed to our collaborators
2-20	Process for determining remuneration	Page 35		5. Committed to our collaborators
2-21	Annual Total Compensation Ratio		Confidentiality restrictions. The data are not publicly available due to company policies.	5. Committed to our collaborators
<b>STRATEGY, POLICIES AND PRACTICES</b>				
2-22	Declaration on the sustainable development strategy	Page 4		1. Presentation
2-23	Commitments and policies	Pages 19, 20, 21, 22		3. Committed to our governance
2-24	Incorporation of commitments and policies	Pages 23, 24, 25		3. Committed to our governance
2-25	Processes to remediate negative impacts	Page 24		3. Committed to our governance
2-26	Mechanisms for seeking advice and raising concerns	Page 19		3. Committed to our governance
2-27	Compliance with legislation and regulations	Pages 25, 28	Cirion Technologies is in compliance with applicable laws and regulations.	
2-28	Membership of associations		Information not available. Currently we are not actively participating of ESG entities or associations.	
<b>STAKEHOLDER PARTICIPATION</b>				
2-29	Stakeholder engagement approach	Page 11		2. Committed to sustainability
2-30	Collective bargaining agreements	Pages 33, 34, 35	As of December 31, 2023, it is recorded that 32% of our company's workforce in Brazil is affiliated to a union entity.	5. Committed to our collaborators
<b>GRI 3: MATERIAL TOPICS 2023</b>				
3. Material topics	3-1	Process of determining material topics	Pages 12, 13	2. Committed to sustainability
	3-2	List of material topics	Page 13	2. Committed to sustainability
<b>MATERIAL TOPIC: ANTI-CORRUPTION</b>				
3. Material topics	3-3	Management of material topics	Page 12	3. Committed to our governance

CONTENT TITLE			LINK TO CONTENT	CHOICE	OMISSION	CHAPTER
205 Anticorruption	205-1	Operations assessed for corruption-related risks	Pages 24, 25			3. Committed to our governance
	205-2	Communication and training on anti-corruption policies and procedures	Pages 21, 22, 23			3. Committed to our governance
	205-3	Confirmed corruption cases and measures taken	Pages 24, 25			3. Committed to our governance
<b>MATERIAL TOPIC: CYBERSECURITY</b>						
3. Material topics	3-3	Management of material topics	Page 29			4. Committed to security
<b>MATERIAL TOPIC: CUSTOMER PRIVACY</b>						
3. Material topics	3-3	Management of material topics	Pages 27, 28			4. Committed to security
418 Customer Privacy	418-1	Substantiated claims regarding customer privacy violations and loss of customer data	Page 28			4. Committed to security
<b>MATERIAL TOPIC: VALUE CHAIN AND HUMAN RIGHTS</b>						
3. Material topics	3-3	Management of material topics	Pages 13, 21			4. Committed to security
408 Child Labor	408-1	Operations and suppliers with significant risk of cases of child labor	Pages 13, 21, 30, 31			4. Committed to security
409 Forced labor	409-1	Operations and suppliers with significant risk of cases of forced or compulsory labor	Pages 13, 21, 31			4. Committed to security
<b>MATERIAL TOPIC: OCCUPATIONAL HEALTH AND SAFETY</b>						
3. Material topics	3-3	Management of material topics	Page 29			5. Committed to our employees
403 Occupational health and security	403 -1	Occupational Health and Safety Management System	Pages 36, 37, 38, 39			5. Committed to our employees
	403-2	Hazard identification, risk assessment, and incident investigation	Pages 36, 37			5. Committed to our employees
	403-3	Occupational Health Services	Page 38			5. Committed to our employees
	403-4	Worker participation, consultation and communication on occupational health and security	Pages 38, 39			5. Committed to our employees
	403-5	Training of workers on occupational health and security	Pages 38, 39			5. Committed to our employees
	403-6	Promoting workers' health	Page 39			5. Committed to our employees
	403-8	Occupational Health and Security Management System Coverage	Page 38			5. Committed to our employees
	403-9	Workplace Accident Injuries	Page 37			5. Committed to our employees
	403-10	Occupational ailments and diseases	Page 37			5. Committed to our employees

CONTENT TITLE		LINK TO CONTENT	CHOICE	OMISSION	CHAPTER
<b>MATERIAL TOPIC: TRAINING AND DEVELOPMENT</b>					
3. Material topics	<b>3-3</b>	Management of material topics	Page 40		5. Committed to our employees
404 Training and teaching	<b>404-1</b>	Average hours of training per year per employee	Page 40		5. Committed to our employees
	<b>404-2</b>	Programs to improve employee skills, and Transition Assistance Programs	Page 42		5. Committed to our employees
	<b>404-3</b>	Percentage of employees who receive periodic performance appraisals	Page 41		5. Committed to our employees
<b>MATERIAL TOPIC: EMPLOYMENT PRACTICES</b>					
3. Material topics	<b>3-3</b>	Management of material issues	Page 43		5. Committed to our employees
401 Employment	<b>401-1</b>	New Employee Hires and Staff Turnover	Page 43		5. Committed to our employees
	<b>401-2</b>	Benefits for full-time employees who do not are given to part-time or temporary employees	Page 38		5. Committed to our employees
<b>MATERIAL TOPIC: DIVERSITY, INCLUSION AND EQUAL OPPORTUNITIES</b>					
3. Material topics	<b>3-3</b>	Management of material topics	Page 44		5. Committed to our employees
405 Diversity and equal opportunities	<b>405-1</b>	Diversity in governing bodies and employees	Page 44		5. Committed to our employees
	<b>405-2</b>	Ratio of basic salary and remuneration of women to men	Page 44	As of December 31, 2023, no significant gender pay gap is identified.	5. Committed to our employees
406 Non-discrimination	<b>406-1</b>	Discrimination and Corrective Action Cases Undertaken	Page 44	No cases of discrimination were recorded	5. Committed to our employees
<b>MATERIAL TOPIC: ENERGY EFFICIENCY AND RENEWABLE ENERGIES</b>					
3. Material topics	<b>3-3</b>	Management of material topics	Page 46		6. Committed to the environment
302 Energy	<b>302-1</b>	Energy consumption within the organization	Pages 47, 48		6. Committed to the environment
<b>MATERIAL TOPIC: GAS EMISSIONS, AIR QUALITY AND CARBON FOOTPRINT</b>					
3. Material topics	<b>3-3</b>	Management of material topics	Page 54		6. Committed to the environment
305 Emissions	<b>305-1</b>	Direct GHG emissions (scope 1)	Page 47		6. Committed to the environment
	<b>305-2</b>	Indirect GHG emissions from power generation (scope 2)	Page 48		6. Committed to the environment
	<b>305-3</b>	Other indirect GHG emissions (scope 3)	Page 53		6. Committed to the environment
	<b>305-4</b>	GHG emissions intensity	Page 49		Unavailable

CONTENT TITLE		LINK TO CONTENT	CHOICE	OMISSION	CHAPTER
<b>MATERIAL TOPIC: WASTE MANAGEMENT, CO-PROCESSING AND CIRCULAR ECONOMY</b>					
3. Material topics	<b>3-3</b>	Management of material topics	Pages 57, 58		6. Committed to the environment
306 Effluents and waste	<b>306-1</b>	Waste generation and significant impacts related to waste	Pages 57, 58		6. Committed to the environment
	<b>306-2</b>	Management of significant impacts related to the waste	Pages 57, 58		6. Committed to the environment
<b>MATERIAL TOPIC: COMMUNITY RELATIONS</b>					
3. Material topics	<b>3-3</b>	Management of material topics	Page 61		7. Committed to our community
413 Local communities	<b>413-1</b>	Local Community Engagement Operations, Impact Evaluations and Development Programs	Page 60		7. Committed to our community
	<b>413-2</b>	Operations with significant negative impacts – actual or potential – on local communities	Page 61	In 2023, Cirion Technologies received only one claim in Argentina for an accident in CABA with a camera cover. It was resolved in a judicial mediation instance in February 2024.	7. Committed to our community

GRI 305-1; 305-2; 305-3

## 6. Committed to the environment

### Gas emissions, air quality and carbon footprint

#### EMISSION FACTORS SCOPE 1



##### Mobile combustion

##### Emissions by fuel

Source of Emission	CO2eq/liter	CH4eq/liter	N2Oeq/liter
Gasoline (Petrol) Mobile	2,330.86	8.72544	6.14769
Diesel - Mobile	2,626	0.30992	34.07859
Diesel - Stationery	2,626	0.30992	34.07859
Liquefied Petroleum Gas (LPG)	1,554.91	1.44232	0.88998

According to 2023 Guideline to DEFRA (Department for Environment, Food and Rural Affairs).



##### Stationary combustion

##### Global Warming Potential (GWP)

Source	GWP	Source	GWP
HFC-407C	1,907.93	HCFC-141b	860
HFC-410A	2,255.55	HCFC-22	1,960
HFC-422D	2,916.69	HFC-438A	2,424.79
HFC134A	1,530	HCFC-123	90.4

According to Intergovernmental Panel on Climate Change (IPCC) Potencial de Calentamiento Global (GWP) Sixth Assesment Report (Arg.) 100 year time horizon IPCC: Intergovernmental Panel on Climate Change

#### EMISSION FACTORS SCOPE 2



##### Purchased Electricity

##### By country

Source of Emission	Emission Factor	Units	CO2e*	CO2e	CH4e	N2Oe
Electric Power - Brazil	Brasilian GHG Protocol (2023)	Kg/MWh	38.51	-	-	-
Electric Power (PPA) Brazil	Brasilian GHG Protocol (2023)	Kg/MWh	38.51	-	-	-
Electric Power - Chile	Chile's National Energy Commission	Ton/MWh	0.2421	-	-	-
Electric Power - Colombia	UPME (2022)	Ton/MWh	0.112	-	-	-
Electric Power - Ecuador	Ministry of Energy and Mines of Ecuador	Ton/MWh	0.092	-	-	-
Electric Power Hollywood/Miami	US EPA eGrid (2023)	Lbs/MWh	839.70	832.92	2.9574	3.822
Electric Power Virgin Islands	US EPA eGrid (2023)	Lbs/MWh	1,569.61	1,558	4.5198	7.098
Electric Power - Mexico	SEMARNAT	Ton/MWh	0.438	-	-	-
Electric Power - Panama	Ministry of Energy R. of Panama	Ton/MWh	0.1079	-	-	-
Electric Power - Peru	International Energy Agency (IEA)	g/kWh	194.43	185.6	3.348	5.4873
Electric Power - Venezuela	International Energy Agency (IEA)	g/kWh	151.72	147.3	1.674	2.74365

#### EMISSION FACTORS SCOPE 3



##### Supply Chain

- C1 – US EPA EEIO 2021 C2-US EPA EEIO 2021
- C3-DEFRA 2021 y 2023, International energy Agency 2021, Environmental authorities from Mexico, Argentina and Colombia
- C5- US EPA emission Factors C6- US EPA EEIO
- C7-US EPA 2023 – DEFRA 2023
- C8- Internation Energy Agency 2021, US EPA EGRID 2023 (data of 2021), Environmental authorities from Mexico, Argentina and Colombia
- C13- Internation Energy Agency 2021, US EPA EGRID 2023 (Data 2021), Authorities
- Mexico, Argentina and Colombia

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