# Cicion

# We Drive Change, We Build Sustainability

SUSTAINABILITY REPORT 2024



## In this Report

## 1. WE ARE CIRION Message from the Leaders About this Report......

About Cirion Technologies

### 2. OUR SUSTAINABLE OUTLOOK

| Sustainable Development Goals          | 13 |
|--|----|
| Our Stakeholders                       | 14 |
| Process of Determining Material Issues | 14 |
| Materiality                            | 15 |

#### 3. OUR GOVERNANCE PRACTICES

| Highlights 2024                       | . 17 |
|---------------------------------------|------|
| Our Structure                         | . 18 |
| Chambers and Associations             | . 19 |
| Ethics and Integrity                  | . 19 |
| Strong Partnerships                   | 22   |
| Security and Privacy of our Customers | .25  |
| Cybersecurity                         | .27  |

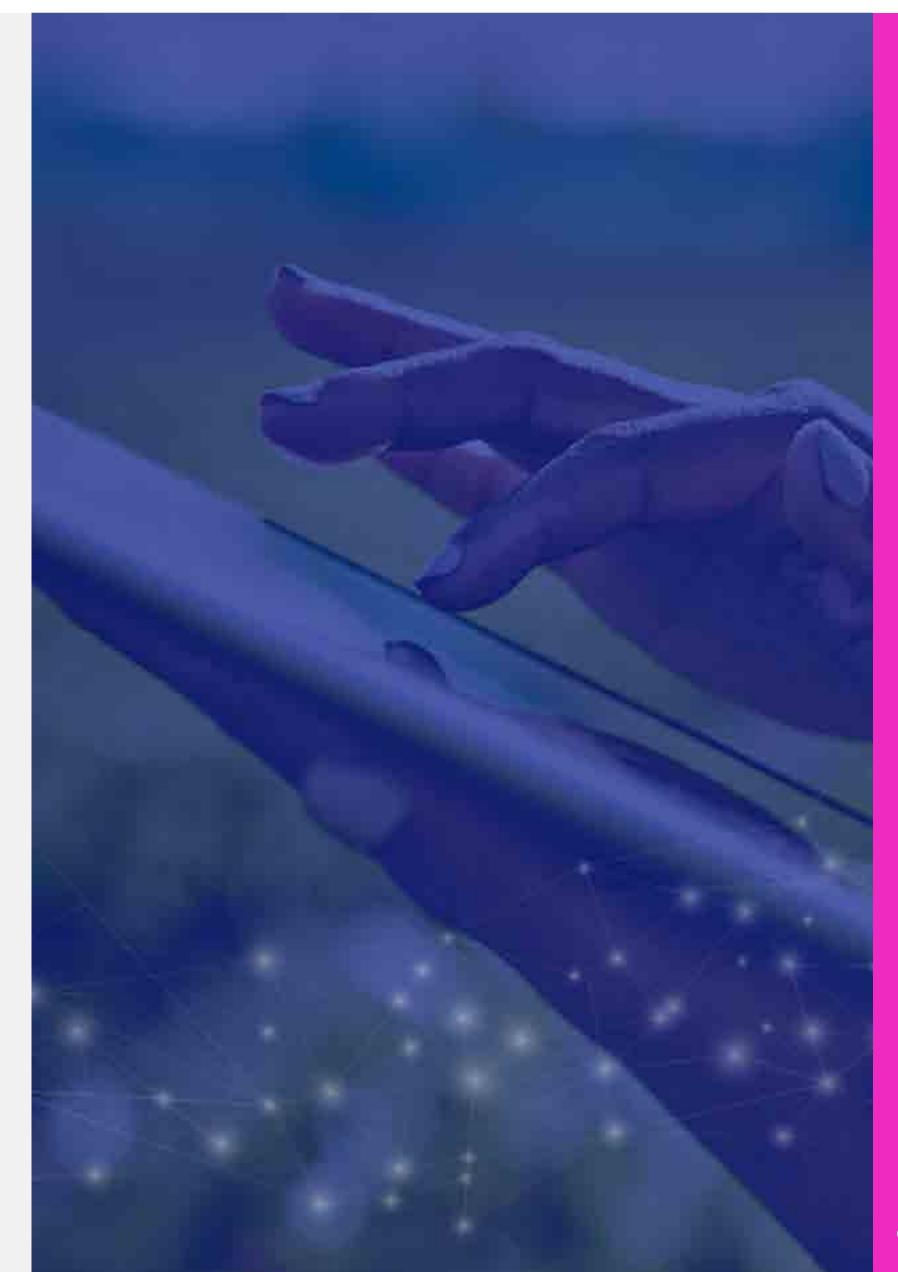
#### 4. OUR TEAM

| Highlights 2024                              | 29 |
|--|----|
| Our Team                                     | 30 |
| Diversity, Inclusion and Equal Opportunities | 33 |
| Training and Development                     | 34 |
| Well-being in our Work Environment           | 39 |
| Health and Safety                            | 40 |

#### 5. OUR ENVIRONMENTAL APPROACH

**GRI Indicator Table** 

| Highlights 2024  | 45 |
|--|----|
| Committed to the Environment                               | 46 |
| Our Methodological Approach                                | 47 |
| Energy Efficiency and Renewable Energies                   | 48 |
| Greenhouse Gas Emissions, Air Quality and Carbon Footprint | 49 |
| Mitigating Environmental Risks                             | 56 |
| Waste Management, Co-processing and Circular Economy       | 57 |
| Environmental Culture and Awareness                        | 58 |
|  |    |
| 6. OUR SOCIAL VALUE  |    |
| Highlights 2024  | 60 |
| Community Relations  | 6  |
| Dialogue and Impact Management                             | 63 |
|  |    |
| 7. GRI INDICATOR TABLE                                     |    |





## 1. WE ARE CIRION

We aim to contribute to the development of a more resilient and sustainable future by integrating innovation with sustainability, empowering people and generating shared value with customers, investors, collaborators, communities and government institutions.



GRI 2-22

## Message from the Leaders

To our readers and stakeholders,

At Cirion we work every day with the conviction that sustainability is a transformative force capable of generating connection, driving innovation and opening up new opportunities.

The balance of this last management cycle invites us to look with pride at the path traveled, marked by the integration and strengthening of our practices. This journey reaffirms our commitments and encourages us to continue transforming our businesses to build, with coherence and dedication, an increasingly sustainable management.



## We are convinced that technology is an ally in building a fairer, more prosperous and connected world.

We are excited to see how, year after year, we consolidate our sustainable management along with the growth of the business. Two dimensions that enhance each other and that allow us to strengthen the creation of value for all our stakeholders.

Our third Sustainability Report is a new milestone that reflects our actions, our growth, the pillars of our culture, our solutions and our way of doing business with a triple impact perspective.

2024 was a year especially driven by the adoption of new strategic perspectives, focused on sustainable value creation and risk prevention and mitigation in our operations.

The transition to an operation based on clean energy has become a strategic axis to guarantee business continuity and anticipate the risks and opportunities associated with climate change. In this context, one of the most significant milestones was the beginning of a decarbonization process that contemplates that each new Data Center operates with a 100% renewable energy goal.

At the same time, we understand that moving towards a more efficient and sustainable operation requires consolidating solid institutional and technological structures. This energy transition is part of a comprehensive vision that also includes the strengthening of corporate governance and data security as fundamental axes for a resilient, transparent and reliable operation in an increasingly digitized environment. In this regard, we updated our Comprehensive Personal Data Policy and Program in accordance with international standards and regulations and expanded the scope of our ISO Security certifications in different operations in Latin America.

In each initiative, we aim to generate shared value by promoting a multiplier effect together with our strategic partners, communities, organizations and people who are part of our chain; mainly in the field of Human Rights. We also seek to ensure responsible sourcing and management through assessments and adherence to our own principles and policies.

Guided by this conviction, we continue to strengthen our community engagement initiatives and social impact projects for employability, education, technological accessibility, and wellbeing; as well as the programs for access to first employment with the aim of providing formal job opportunities to young talents. With more than 18 active projects in Latin America, we are proud to continue driving development and shared growth, both inside and outside our company.

Finally, we would like to especially thank the more than 2,000 people who are part of our work teams, who make each

achievement possible. Their daily commitment is the reflection of a collaborative culture, where each person can fully develop and leave a mark for a sustainable technological future.

We thank the more than 3,200 suppliers and 5,500 customers, as well as the companies, organizations and investors who accompany us with confidence and continue to bet on Cirion's sustainable growth. Your support is essential to continue making a positive and sustainable impact over time.

With passion and conviction, because we are convinced that sustainable development is only possible when we combine innovation, collaboration and responsibility in every step we take.



Santiago Londoño CEO Connectivity



Nelson Fonseca CEO Data Centers



GOVERNANCE

**EMPLOYEES** 



GRI 2-2; 2-3

## About this Report

We present our Third Annual Sustainability Report, which covers the period from January 1 to December 31, 2024, in reference to the standards of the Global Reporting Initiative (GRI).

The aim of this report is to provide a clear and detailed view of our operations and their environmental and social impact, focusing on key areas such as governance, safety, supply chain, employees, environmental impact and community relations. Through the disclosure of this information, we strive to provide our customers, business partners, investors, and other stakeholders with a solid basis for assessing our sustainability commitment and progress.

With this perspective, we reaffirm our conviction to be pioneers in the transformation towards a sustainable and responsible industry.

The information contained herein includes the consolidated and audited financial statements as of December 2024.

For questions, suggestions or more information, please contact us at: <a href="mailto:esg\_group@ciriontechnologies.com">esg\_group@ciriontechnologies.com</a>

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GRI 2-1; 2-6

## About Cirion Technologies

At Cirion we encourage technological and innovative solutions to promote the progress of the region and be one step ahead of the needs of our customers. In this way, we guarantee the management and protection of your physical and informational assets. This positions us as allies in the digitization of hyperscalers, carriers (networks for the interconnection of data) and organizations of all industries in Latin America.

We operate one of the largest and most robust Latin American networks, with a global reach that positions us as leaders in connectivity. Our infrastructure includes one of the main submarine networks in the region, guaranteeing high capacity and low latency for data transport.

In addition, we have one of the most interconnected Carrier-Neutral Data Center platforms in Latin America, offering a digital ecosystem that ensures the continuity and scalability of our customers' operations.

Throughout our history, we have established strong relationships with our clients, building a community of trust and collaboration. We are the technology partner of choice for more than 5,500 customers globally, including leading enterprises, government agencies, hyperscalers, Internet Service Providers, operators and other organizations.

We are committed to providing the best infrastructure in the region, ensuring a top-notch, reliable and secure experience.

#### Learn more.



#### **TERRESTRIAL NETWORK**

-22,000 km

+30
PEERING CONNECTIONS

Tier I

~12,400 ON-NET BUILDINGS

+32,500 km

~300

+20 countries

~27 Tb/s
PEERING TOTAL CAPACITY

~668 Tb/s

+500



#### **SUBSEA NETWORK**

+50,400 km

18
LANDING STATIONS

~191.4 Tb/s

6 Key Subsea Systems
(SAC, SAC2, MAC, PAC, CC, TAC)



#### **DATA CENTERS**

18
DATA CENTERS
CARRIER-NEUTRAI
+ 3 UNDER
CONSTRUCTION

+5,300

+1,300
ASS IP CONNECTED

+4,900 CROSS CONNECTS

+100
NETWORK SERVICE PROVIDERS

+100

CARRIERS & NETWORK SERVICE PROVIDERS

CLOUD ON-RAMPS



GOVERNANCE

**EMPLOYEES** 



GRI 2-1; 2-6

## Our Connectivity Network

Located in Miami, United States, we operate in a wide range of countries in the region, 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 a comprehensive and efficient presence throughout the region.

With the aim of providing a state-of-the-art infrastructure to our customers, who require dedicated connectivity, information technology (IT) tools, and cloud presence in the region, at the end of 2024 we expanded our fiber network with a new duct, prepared for Artificial Intelligence (AI), improving connectivity between Mexico City and Queretaro.

We also announced the launch of South American Crossing-2 (SAC-2), a new, fully diverse and resilient Atlantic submarine route that expands fiber connectivity between Latin America and North America.

This new route is part of the state-of-the-art submarine system – Firmina – and complements the existing cables of Cirion, SAC (South American Crossing) and MAC (Mid Atlantic Crossing).

SAC-2 offers a complete diversity of existing Atlantic systems and traditional landing sites in Florida and New York. The route includes a landing point in Praia Grande, Brazil, and will run from Myrtle Beach, South Carolina, on the U.S. East Coast, to Cirion's neutral cable mooring station in Las Toninas, Argentina.



#### **OUR FIBER NETWORK**

#### SAC 2

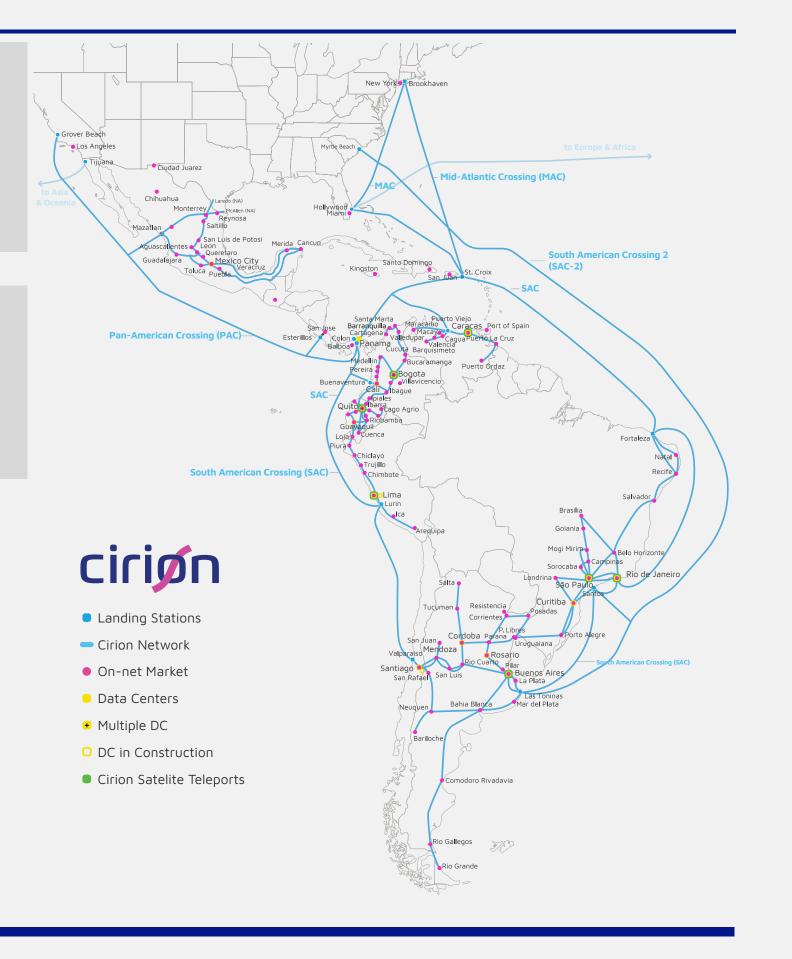
LAUNCH SOUTH AMERICAN CROSSING-2

NEW ATLANTIC SUBMARINE ROUTE, WHICH EXPANDS FIBER

CONNECTIVITY BETWEEN LATIN AMERICA AND NORTH AMERICA

#### **EXPANSION OF THE FIBER OPTIC NETWORK IN MEXICO**

IMPROVING CONNECTIVITY BETWEEN MEXICO CITY AND QUERETARO.





GRI 2-1; 2-6

## Our Data Centers

Our Data Center platform stands out for offering the largest regional interconnection system: an extensive portfolio of solutions and secure, low-latency connectivity capabilities.

We position ourselves as a strategic partner thanks to our unique regional coverage in Latin America, agile access to a consolidated ecosystem, international certifications, preparation for Artificial Intelligence environments and a firm commitment to sustainability.

In 2024 we added new infrastructures and Data Centers -SAN2 and **LIM2**-, which are added to our platform, and we significantly expanded the complex in São Paulo, Brazil (SAO1), Rio de Janeiro (RIO1) and Buenos Aires (BUE1).





#### **OUR DATA CENTERS NETWORK**

Development and continuous improvement in digital and technological infrastructure in Latin America:

CARRIER-NEUTRAL DATA CENTERS

IN BRAZIL+15,000 ADJACENT SOM

+50%

DE JANEIRO AND

NEW DATA

CENTERS

+SAO1 +RIO1 +BUE1 | BUENOS AIRES

SAN2

LIM2

RIO2

The expansion of our Network allows us to ensure sustainable scalability for our customers in a context of growing adoption of cloud services and digital demand in the region.





## Quality and Safety Certifications

#### Connectivity and Data Centers

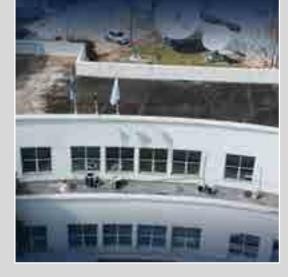
Our commitment to excellence, safety and quality ensures that our operations meet the highest global standards.

Connectivity networks and Data Centers are certified by various multinational organizations, which validate and guide our processes in key areas: operational excellence and quality, continuous process improvement, information security and confidentiality, environmental management and energy efficiency, and business continuity, among others.











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|----|-----------------------|
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|    |                       |
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Uptime Institute

| NORMA/<br>CERTIFICATION   | BUE1<br>BUENOS AIRES, ARGENTINA   | SAO1<br>SAO PAULO, BRASIL   | CUR1<br>CURITIBA, BRASIL  | RIO1<br>RIO DE JANEIRO, BRASIL  | SAN1<br>SANTIAGO, CHILE   |
|---|---|---|---|---|---|
| Uptime<br>Certification   |   | <ul><li>Tier III Design Documents</li><li>Tier III Constructed Facility</li></ul>   | <ul><li>Tier III Design Documents</li><li>Tier III Constructed Facility</li></ul>   | <ul><li>Tier III Design Documents</li><li>Tier III Constructed Facility</li></ul>   | Tier III Design Documents   |
| Payment Card Data Security Standard - Attestation of Compliance |   | • PCI-DSS 4.0.1   | • PCI-DSS 4.0.1   | • PCI-DSS 4.0.1   | • PCI-DSS 4.0.1   |
| Assurance Report - Attestation of Compliance                    | • ISAE3402 SOC1   | <ul><li>ISAE3402 SOC1</li><li>ISAE3402 SOC2</li><li>ISAE3402 SOC3</li></ul>   | <ul><li>ISAE3402 SOC1</li><li>ISAE3402 SOC2</li><li>ISAE3402 SOC3</li></ul>   | <ul><li>ISAE3402 SOC1</li><li>ISAE3402 SOC2</li><li>ISAE3402 SOC3</li></ul>   | <ul><li>ISAE3402 SOC1</li><li>ISAE3402 SOC2</li><li>ISAE3402 SOC3</li></ul>   |
| ISO Standard  | <ul> <li>ISO 9001</li> <li>ISO 20000-1</li> <li>ISO 27001</li> <li>ISO 27017</li> <li>ISO 27018</li> <li>AWS Advance Partner</li> </ul> | <ul> <li>ISO 9001</li> <li>ISO 20000-1</li> <li>ISO 27001</li> <li>ISO 27017</li> <li>ISO 27018</li> <li>ISO 14001</li> <li>ISO 45001</li> <li>ISO 27701</li> </ul> | <ul> <li>ISO 9001</li> <li>ISO 20000-1</li> <li>ISO 27001</li> <li>ISO 27017</li> <li>ISO 27018</li> <li>ISO 14001</li> <li>ISO 45001</li> <li>ISO 27701</li> </ul> | <ul> <li>ISO 9001</li> <li>ISO 20000-1</li> <li>ISO 27001</li> <li>ISO 27017</li> <li>ISO 27018</li> <li>ISO 14001</li> <li>ISO 45001</li> <li>ISO 27701</li> </ul> | <ul> <li>ISO 9001</li> <li>ISO 27001</li> <li>ISO 27017</li> <li>ISO 27018</li> <li>ISO 14001</li> <li>ISO 45001</li> </ul> |
| Partner<br>Program  | AWS Advance Partner   | AWS Advance Partner   | AWS Advance Partner   | AWS Advance Partner   | AWS Advance Partner   |



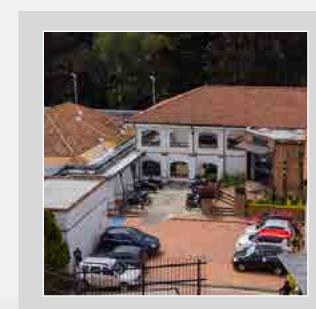
ISO 9001

## Quality and Safety Certifications

ISO/IEC 27001

#### **Connectivity and Data Centers**

For our Connectivity and Fiber operations, we have certifications focused on the SOC (Security Operation Center) area:











| NORMA/<br>CERTIFICATION |
|-------------------------|
|                         |

Uptime

Partner

Program

BOG1 BOGOTA, COLOMBIA

BOG2 **BOGOTA, COLOMBIA** 

Tier III Design Documents

AWS Advance Partner

CAL1 CALI, COLOMBIA

CAR1 CARCELEN, ECUADOR

AWS Advance Partner

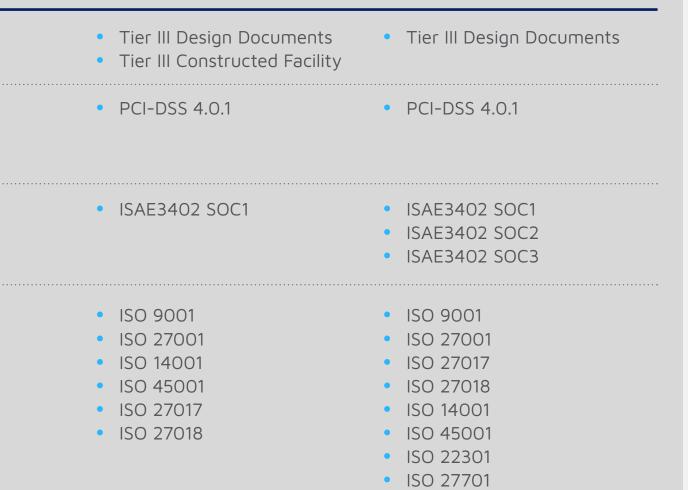
LIM1 LIMA, PERU

AWS Advance Partner

| Certif | icate  | Certif | icate  | Certi | ficate  |
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ISO/IEC 20000-1

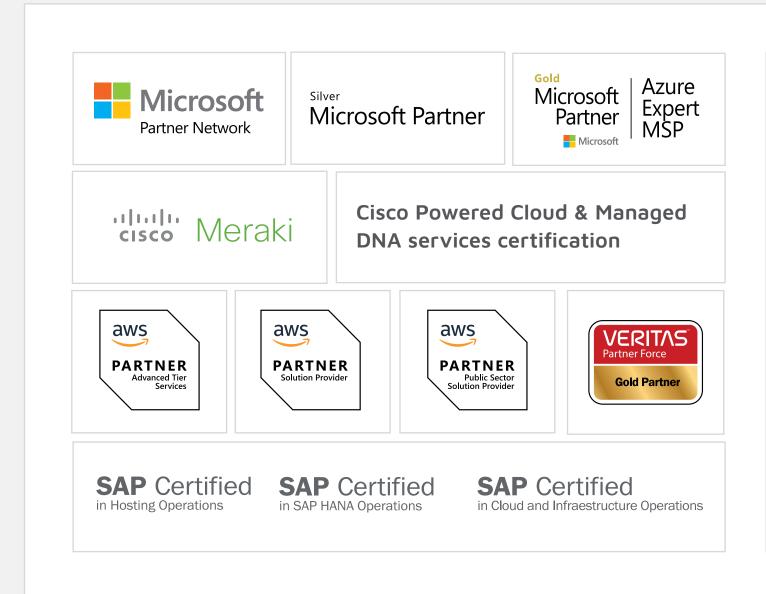
| Certification  |   | Tier III Constructed Facility   |  |
|--|---|---|--|
| Payment Card Data<br>Security Standard<br>- Attestation of<br>Compliance |   | • PCI-DSS 4.0.1   | • PCI-DSS 4.0.1  |
| Assurance Report - Attestation of Compliance                             |   | <ul><li>ISAE3402 SOC1</li><li>ISAE3402 SOC2</li><li>ISAE3402 SOC3</li></ul>   | <ul><li>ISAE3401 SOC1</li><li>ISAE3402 SOC2</li><li>ISAE3402 SOC3</li></ul>      |
| ISO Standard   | <ul> <li>ISO 9001</li> <li>ISO 27001</li> <li>ISO 22301</li> <li>ISO 27701</li> </ul> | <ul> <li>ISO 9001</li> <li>ISO 27001</li> <li>ISO 27017</li> <li>ISO 27018</li> <li>ISO 22301</li> <li>ISO 27701</li> <li>ISO 14001</li> <li>ISO 45001</li> </ul> | <ul><li>ISO 9001</li><li>ISO 27001</li><li>ISO 22301</li><li>ISO 27701</li></ul> |







## Awards and Recognitions 2024





#### **Best Practices Award**

Recognition as Latin American Company of the Year in Business Services, for our performance in the industry and presence in Latin America.



#### **SD-WAN Service Provider of the year**

Recognized as an industry-leading service provider for our advanced SD-WAN solution and use of MEF-certified technologies.



#### **SASE Service Provider of the year**

Recognized as a leading provider of SASE services and for our ability to combine SD-WAN, Zero Trust, and SSE with SASE Service Provider of the year.



# 2. OUR SUSTAINABLE OUTLOOK

Through transparent and responsible management, we integrate ESG criteria to generate value, promote regional development and accompany and support Latin America's transformation through innovation and technology.



GOVERNANCE

**EMPLOYEES** 



GRI 2-23

## Sustainable Development Goals

Our commitment to being agents of change continues to grow stronger year after year. We align our strategy with the 2030 Agenda and its Sustainable Development Goals, focusing on key areas to generate a positive impact throughout our value chain and thus contribute to sustainable development in Latin America.

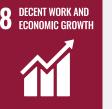
Our initiatives and projects are designed to promote responsible, inclusive growth that respects the environment and people, always in constant dialogue with our stakeholders.

Below, we detail the 8 priority areas that guide our work and commitment, and their contribution to the Sustainable Development Goals.

#### PRIORITY AREAS FOR MANAGEMENT

#### CONTRIBUTION TO THE 2030 AGENDA AND PRIORITY SDGs

#### Environmental Compliance & Management

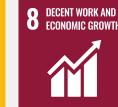












**Energy and Emissions** 





Waste Management, Co-procesing and Circular Economy







Climate Preparedness



Water Management

Health and Safety



















**Community Relation** 





**GRI 2-29** 

## Our Stakeholders

At Cirion we aim to generate shared value with our stakeholders in all business opportunities. Through continuous dialogue, we foster spaces to understand their expectations and needs, including: surveys and sharing tools such as the biannual relationship survey, which allows us to measure customer satisfaction through the Net Promoter Score (NPS); the Integrity Line -available to all our stakeholders-, the Materiality survey, in-depth interviews and frequent management meetings, among others.

GRI 3-1; 3-2

# Process of Determining Material Issues

The issues that our stakeholders consider to be priorities continue to be the fundamental basis of the materiality analysis, guiding the definition of the company's material issues.

This exercise allows us to generate a space for exchange and assessment through a broad and representative survey, with a comprehensive and diverse vision of their priorities and expectations. As a result of this analysis, we defined the issues that reflect the areas of greatest impact and opportunity for our organization, aligned with the current and future challenges facing the industry and the region.



We create sustainable business opportunities by generating shared value with our stakeholders through continuous dialogue, strengthening communities with educational initiatives and active collaboration with government institutions.

#### MATERIAL ISSUES DEFINITION PROCESS



#### 01. Material Issues

Identification of the material issues that represent the most significant impacts on the economy, the environment and people. This includes actual and potential impacts that affect their operations and human rights.



#### 02. Groups

Selection of key stakeholders (employees, customers, suppliers and community, among others) to know their perceptions and priorities regarding the issues evaluated.



#### 03. Validation

Validation and prioritization of issues with internal and external referents to ensure that material issues reflect the most significant impacts. This validation includes reviews by Cirion's ESG committee.



#### 04. Feedback

Distribution of the survey among the selected stakeholders – external and internal – to identify perceptions and expectations.



#### 05. Relevance

Definition, prioritization and validation of the material issues that will be reported. The entire process is documented, including the decisions, criteria and thresholds used for the selection and final definition of the topics, ensuring clarity and traceability.



#### 06. Outcome

Communication of results to all stakeholders and periodic review to reflect changes in context, operations or stakeholder expectations.



GRI 3-1; 3-2

## Materiality

We work collaboratively with our stakeholders to assess environmental, social, and governance (ESG) aspects according to four levels of relevance: non-relevant, low relevance, moderate relevance, and high relevance. According to the evaluation of each aspect, we developed an updated Materiality matrix that allows us to prioritize the issues based on the real and potential impact that Cirion generates on the environment and society.

Given the changes in the global context of Sustainability, the standardization of new reporting frameworks and initiatives, new ESG trends and the priorities of our Connectivity and Data Center businesses, in 2025 we intend to carry out a new Double Materiality analysis that will be included in the next Report.

#### MATERIAL ISSUES

**Energy Efficiency and Renewable Energies** 

Greenhouse Gas Emissions, Air Quality and Carbon Footprint

Waste Management, Co-processing and Circular Economy

Health and Safety

Training and Development

Employment Practices

Diversity, Inclusion and Equal Opportunities

Community Relations

Anticorruption

G

Cybersecurity

Customer Privacy

Value Chain and Human Rights





# 3. OUR GOVERNANCE PRACTICES

We foster a culture of integrity, trust and ethics for responsible management in all our operations, where our priority is to protect our customers' data and privacy through advanced technologies, cutting-edge tools and strict operational protocols.

#### Material Issues:

- Anticorruption
- Cybersecurity
- Customer Privacy
- Value Chain and Human Rights





## Highlights 2024

#### 99% Employees

Trained in the internal Code of Conduct, the Code of Conduct for Suppliers, the Regulatory Compliance Program and in Anti-Corruption practices, Cybersecurity practices and Data Privacy and Confidentiality Management, reaching more than 2,200 people.

#### **New Leadership in Cybersecurity**

We create specific roles in Policy Risk & Compliance, Platform & Application Security, Corporate Network Security, Internal Red Team, and Business Continuity for a comprehensive approach to cybersecurity.

#### **Data Protection**

We redefined our Comprehensive Personal Data Protection Policy and Program with new international clauses, standards and regulations.

## **Expansion of our ISO Certifications in Security**

We extended the scope of ISO 27001, 23301, 27017, 27018 and 27701 Data Security and Privacy Standards to our operations in Peru, Ecuador and Colombia.

#### 3,200 Suppliers and Business Alliances

Together we provide an ecosystem of innovative solutions that fit the needs of our customers.

## Human Rights and Environmental Assessment

We extend our commitment to sustainability throughout the value chain, promoting the adherence of our suppliers to commitments in terms of Human Rights, responsible sourcing and environmental management.

#### **CONTRIBUTION TO SDGs**









GRI 2-9; 2-11; 2-12; 2-13; 2-14; 2-17

## **Our Structure**



#### **BOARD OF DIRECTORS**

Our governance structure is led by an eight-member Board of Directors, chaired by Andrew Thomas, which meets quarterly to assess the operational, financial and sustainable performance of operations, ensuring compliance with corporate strategy.

Through specialized subcommittees, we aim to facilitate strategic analysis and decision-making for the sustainable growth of the organization.

#### **COMMITTEES**

#### **01. COMPENSATION COMMITTEE**

Review and approve employee salary and benefits policies.

#### **02. AUDIT AND RISK COMMITTEE**

Ensure the accuracy of financial reporting, oversee independent audits, ensure the integrity of internal controls, regulatory compliance, and risk management.

In addition, it collaborates closely with the Board of Directors to promote policies and projects that enhance our environmental performance.

## **03. CAPITAL INVESTMENTS COMMITTEE**

Evaluates and approves capital investments, ensuring their alignment with corporate objectives.

#### **SUBCOMMITTEES**

#### **04. ESG SUB-COMMITTEE**

Plan and evaluate sustainability initiatives, ensuring that corporate practices reflect our commitments to social and environmental responsibility, including:

- Supervision and validation of the sustainability report.
- The submission of periodic reports to the Board of Directors on the environmental impacts and effectiveness of mitigation measures.
- The annual review of the Integrated Management System to maintain continuous improvement in operations.
- Reporting and communicating progress to shareholders, Stonepeak and AustralianSuper.

Composed of EVP of Marketing, the EVP of Human Resources and the EVP General Counsel.

## O5. EXECUTIVE SUB-COMMITTEE ON CORPORATE COMPLIANCE

Oversees the Corporate Compliance Program, the Code of Ethics and initiatives related to integrity and transparency in our operations.

Composed of CEO, the EVP of Human Resources and the EVP General Counsel.

This Committee meets quarterly to evaluate relevant cases, analyze trends, and submit detailed reports to the Audit and Risk Committee.



**GRI 2-28** 

# Chambers and Associations

At Cirion we actively participate in institutional articulation spaces that promote dialogue, collaboration and the exchange of good practices for the development of the industry:

- Asociación de Bancos Chile
- Asociación Brasilera de Data Centers (ABDC) Asociación Brasilera de Proveedores de Internet y Telecomunicaciones (Abrint)
- Asociación Chilena de Data Centers Chile
- Asociación Colombiana de Business Process Outsourcing (BPRO)
- Asociación Colombiana de Data Centers y Tecnologías de Datos (ACOLDC)
- Asociación Nacional de Industriales (ANDI) Colombia
- Asociación Nacional de Proveedores de Internet (WISPMX) -México
- Cámara Argentina de Internet (CABASE)
- Cámara Chilena de la Construcción (CCHC) Chile
- Cámara Colombiana de Informática y Telecomunicaciones (CCIT)
- Cámara de Comercio de Lima
- Cámara de comercio de Valparaíso
- iMasons Estados Unidos
- Sociedad de Fomento Fabril (SOFOFA) Chile
- Sociedad Nacional de Minería (SONAMI) Chile
- Telcomp Brasil
- Women in Tech Global
- Cámara de Empresas de Servicios de Telecomunicaciones (CASETEL) - Venezuela
- Cámara Venezolana de Tecnologías de la Información (CAVEDATOS) ) - Venezuela

GRI 3-3

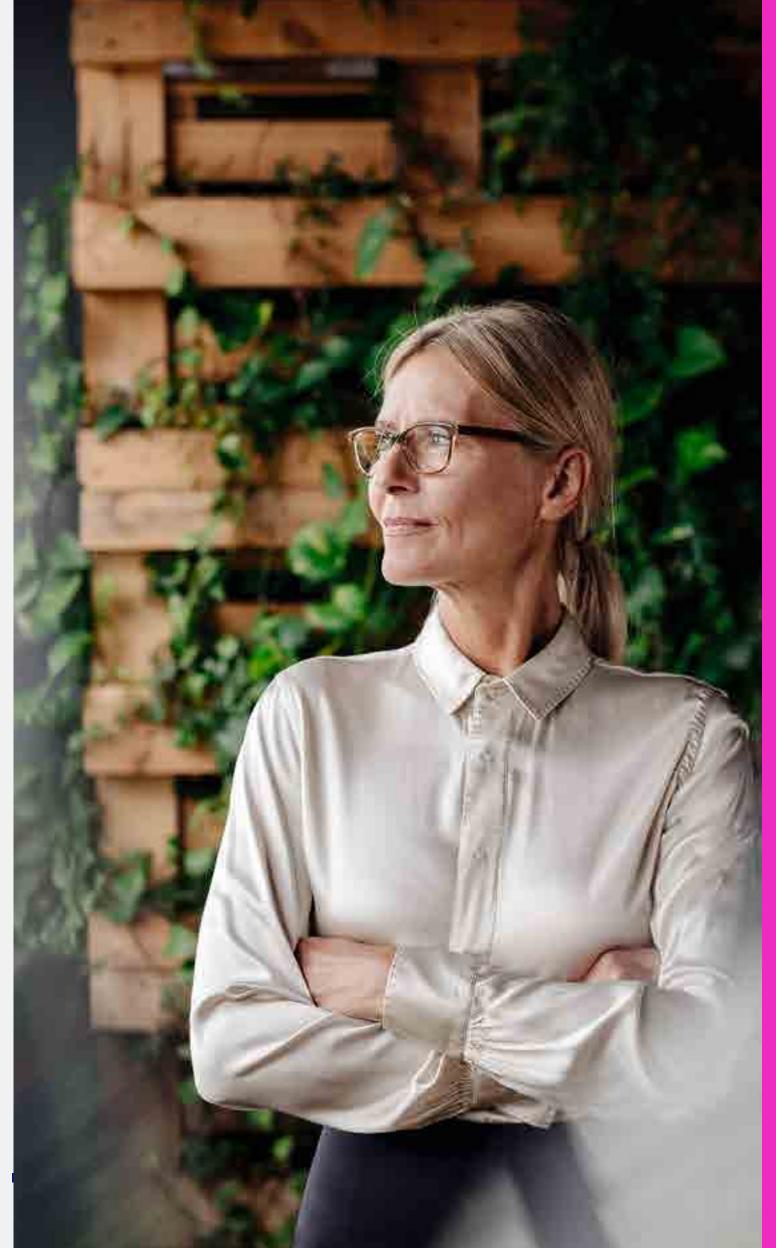
## Ethics and Integrity

At Cirion we actively participate in institutional articulation spaces Our Corporate Compliance Committee is responsible for designing, planning, and aligning our practices with the highest standards of ethics, integrity, and transparency as essential pillars of our operation; which are framed in our Code of Conduct, Integrity Line and Corporate Compliance Program.

Our corporate principles guide our organization's strategy for engaging with our customers, partners, and communities:

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

For more information on our ethical business values, please visit our <u>website</u> and follow our updates on <u>LinkedIn</u>.



GRI 2-15; 2-16; 2-23; 2-24; 2-25; 2-26

## Code of Conduct and Ethics Line

Through the Code of Conduct, we establish the behavioral parameters that guide our corporate decisions, strengthen the relationship with our stakeholders and contribute to the prevention of risks and mitigation of potential negative impacts.

The Code is applicable to all people in the company and is integrated into each of the processes and levels through induction programs, periodic all-hands communications (general meetings) and training associated with performance evaluations.

At the same time, we implemented a Regulatory Compliance Program for the dissemination and consolidation of our ethical principles and standards of conduct. It includes mandatory annual training on the Code of Conduct and Human Rights, accompanied by spaces for dialogue that allow resolving queries and detecting possible irregularities.

It is also based on a set of key corporate policies, linked to the prevention of corruption and the management of conflicts of interest, among others.

99% EMPLOYEES
TRAINED IN THE
CODE OF CONDUCT
IN 2024

67%

EMPLOYEES
COMPLETED THE
DECLARATION OF
CONFLICTS OF
INTEREST IN 2024

#### **OUR ETHICAL POLICIES AND PROCEDURES:**

- 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

As a fundamental part of our practices, we provide an <u>Integrity</u> <u>Line</u> that acts as an official channel for employees, suppliers or other external stakeholders to raise queries, doubts or complaints related to the company's ethical performance and/or possible conflicts of interest.

The line is available 24 hours a day, every day of the week, and ensures confidentiality and protection of personal data. It is available in English, Spanish and Portuguese.

The cases received are investigated by a team specialized in Corporate Compliance and reported to the Executive Compliance Committee, which determines the corrective measures to be implemented and/or preventive for the resolution of the case. All complaints received and cases investigated with their respective findings are reported quarterly to the Audit and Risk Committee of the Board of Directors.

During 2024, our monitoring system has not identified cases that would require escalation to the Committee.

Here are several ways to access our Integrity Line:

E-mail:

compliance.cirion@resguarda.com

Telephone:

Click here to get the list of toll free numbers by country

Website:

Click here to acces to the oficial site of Integrity Line





GRI 2-27; 3-3; 205-1; 205-2

## Anticorruption

Our Anti-Corruption Policy is complemented by other internal regulations such as the <u>Code of Business Conduct</u>, the Confidential Information Policy and the Code of Conduct for Suppliers for the determination of standards of ethics and transparency in the management of our operations and value chain.

The Compliance and Internal Audit teams are responsible for the supervision and implementation of these practices, including the design of preventive controls, the periodic evaluation of regulatory compliance and risk management.

In 2024 we carried out 5 mandatory trainings for the entire company, and our Anti-Corruption training reached more than 2,200 employees, achieving a of 99% participation.

| TRAINING                       | %    |
|--------------------------------|------|
| Anticorruption                 | 99%  |
| Business Continuity Management | 99%  |
| Compliance Colombia            | 99%  |
| Compliance US                  | 99%  |
| Data Privacy                   | 98%  |
| Ethics and Code of Conduct     | 99%  |
| Crime Prevention Chile         | 100% |
| Security Awareness             | 99%  |

### The company's operations are subject to periodic corruption risk assessments

through internal audits and compliance reviews implemented in all the countries where we operate. These evaluations include reviewing the effectiveness of the Compliance Program and key aspects such as anti-bribery measures, contracting and interaction with third parties, payments to third parties, reimbursements to collaborators and transactions.







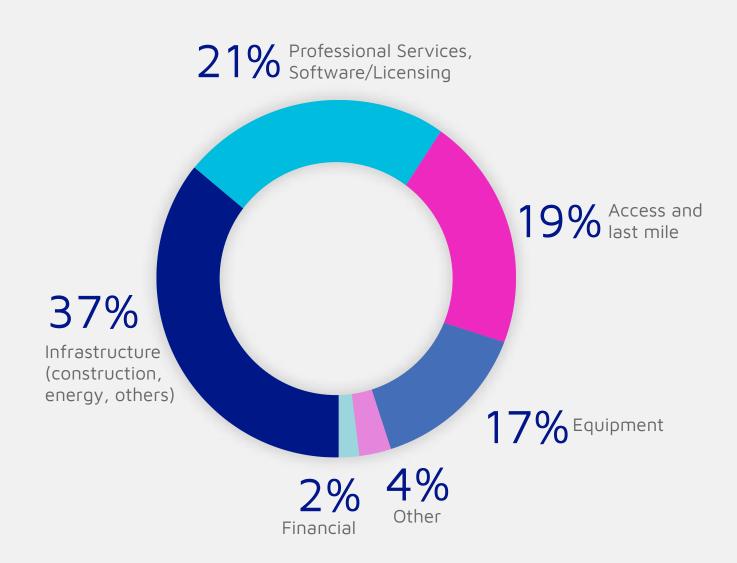


GRI 2-6

## Strong Partnerships

At Cirion, we encourage the building of strong partnerships. With a network of more than 3,200 suppliers and business partners, we build strategic relationships and collaborations to provide an ecosystem of innovative solutions that fit our customers' needs.

#### **SUPPLIERS BY SECTOR**







GRI 3-3; 2-23; 2-24

## Human Rights in the Value Chain

We select our suppliers through a rigorous process that includes background checks and review of industry-relevant certifications. This approach allows us to ensure that our supply chain operates under the highest standards of integrity, quality and accountability, in line with our corporate values.

At Cirion, protecting integrity is a central pillar of our corporate strategy. Therefore, throughout our value chain, we require our business partners to adhere to and accept the <u>Code of Conduct for Suppliers</u>, which establishes guidelines on Human Rights, responsible labor practices, and regulatory compliance.

These commitments are contractually formalized and verified through due diligence processes and periodic evaluations, in order to identify opportunities for joint improvement or potential breaches of the Code.

Our integrity line is available to all our suppliers and partners in the value chain, in order to identify opportunities and/or resolve suggestions and problems. This approach is complemented by corporate policies that address key issues such as the prevention of corruption, the management of conflicts of interest and the promotion of transparency in all our business relationships:

- Freedom of labor association.
- Absolute prohibition of child labor, in compliance with current legislation.
- Support for fundamental rights, combating forced labour, modern slavery and human trafficking.
- Data protection and privacy.
- Active promotion of diversity and inclusion, with zero tolerance for discrimination.
- Guarantee of safe work environments.
- Contribution to community development.
- Responsible sourcing: exclusion of minerals from conflict zones.



We implemented mandatory training sessions on the Supplier Code of Conduct for all our employees, in order to ensure the internalization and projection of our corporate values in our supply chain.



GOVERNANCE



**GRI 3-3** 

## Environmental Assessment of our Suppliers

In addition to evaluating and monitoring our suppliers and business partners on human rights and social impact, we promote the incorporation of environmental considerations into their operations. We expect our counterparts to adopt criteria aligned with the following key aspects:

- Regulatory compliance: strict adherence to current environmental legislation.
- Responsible management of the environmental impacts derived from its activities.
- Proper handling of dangerous substances.
- Prevention of air, soil and water pollution.
- Conservation of ecosystems and biodiversity.
- Implementation of effective recycling programs.
- Adoption of Environmental Management Systems that drive continuous improvement.

Our collaborative approach reinforces the commitment to a responsible value chain aligned with the principles that guide our corporate strategy.







**GRI 3-3** 

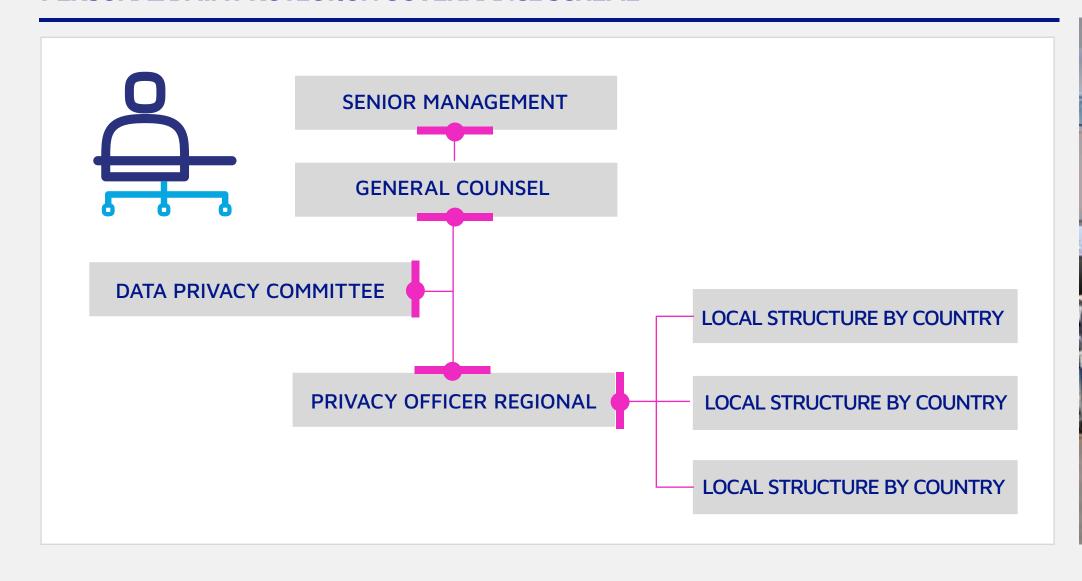
## Security and Privacy of our Customers

As a fundamental part of our governance structure, Cirion has a Data Privacy Committee that meets monthly to ensure compliance with data privacy regulations and is responsible for:

- Plan, update and implement our Comprehensive Personal Data Protection Policy and Program.
- To administer and respond to data protection requests.
- Create policies and procedures for the assessment and management of privacy-related risks.
- Analyze the privacy impact of new projects.
- Organize the response to incidents that affect personal data.
- Appoint those in charge of conducting data mapping, privacy assessments, and impact analyses.

Personal Data Protection Policy is shared with all our collaborators and contractors in order to promote the appropriate use of the information of our customers and key stakeholders. In 2024, we updated the Program according to new clauses, standards, and regulations of the different jurisdictions, and we trained all teams to continue strengthening the safety culture.

#### PERSONAL DATA PROTECTION GOVERNANCE SCHEME





To ensure compliance with the Program and strengthen transparency in our information management, we use One Trust, a software that allows us to:

- Improve the digital experience and user control, thanks to the online customer service and the optimisation of the management and control of cookies on our websites.
- Strengthen our internal management. Through a comprehensive mapping of all processing activities (encompassing processes, assets, products, and suppliers), conducting impact assessments on core operations, and centralized and transparent management of consents for the processing of personal data.
- Elevate risk management, strengthening our analysis and proactive assessment of risks associated with the processing of sensitive information.

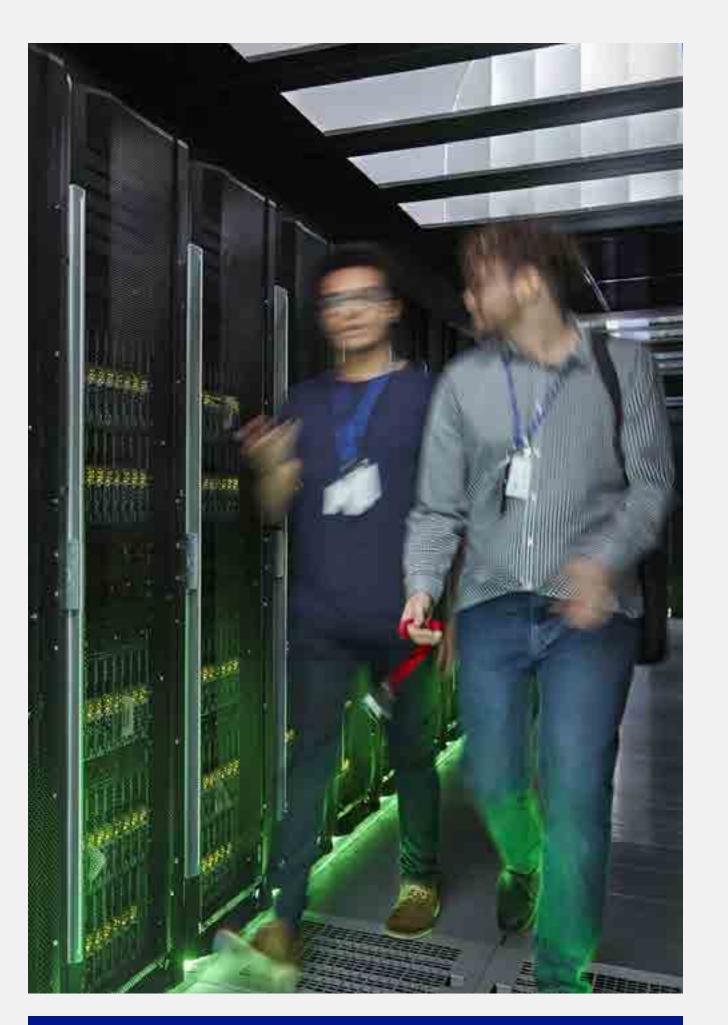




GRI 3-3

## About our Data Privacy and Security Certifications

- Information Security Management ISO 27001 Certified in Argentina, Brazil, Chile, Colombia, Ecuador and Peru; and its expansion is planned for the new Data Centers in Chile (SAN2) and Peru (LIM2).
- Business Continuity Management ISO 23301 Certified in Brazil, Colombia and Peru.
- Cloud Services Information Security ISO 27017 Certified in Argentina, Brazil, Colombia, Chile, Peru, and Ecuador.
- Protection of Personally Identifiable Information (PII) ISO 27018 Certified in Argentina, Brazil, Colombia, Chile, Peru, and Ecuador.
- Information Privacy Management ISO 27701 Certified in Brazil, Colombia and Peru. Its expansion to Argentina and Ecuador is planned.



#### **REGULATORY FRAMEWORK**

| COUNTRY                       | APPLICABLE LAW  |
|-------------------------------|---|
| Argentina                     | Act 25,326 - Personal Data Protection Act.  |
| Brazil                        | Act.13,709/2018 – Personal Data Protection General Act.   |
| Chile                         | Act. 21,719 - Data protection and processing.<br>Act. 19,628 on private life protection.  |
| Colombia                      | Act. 1581,2012 - Personal Data Protection and Regulatory Decree 1377, 2013.   |
| Costa Rica                    | Act No 8968 - Individual Protection Act for personal data treatment and regulation thereof.   |
| Ecuador                       | Official Record Supplement 459, Personal Data Protection General Act.   |
| Mexico                        | Personal Data Protection Federal Act.   |
| Panama                        | Act 81, 2019, Personal Data Protection and Regulatory Decree.   |
| Peru                          | Act 29733, Personal Data Protection and Regulatory Decree approved by Supreme Decree N° 003-2013-JUS.   |
| Uruguay                       | 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.   |
| United States<br>(California) | 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. |
| Venezuela                     | Constitution of the Bolivarian Republic of Venezuela.   |



GRI 3-3

## Cybersecurity

Faced with the challenges that come with the transmission of large volumes of information, we take a strategic approach to ensure the comprehensive protection of our systems and their data and mitigate the risks associated with the activity.

To report incidents related to Data Privacy and/or Data Security, Cirion offers the following means of communication:

Data Privacy Incidents:

E-mail:

data.privacy@ciriontechnologies.com

Phone Contact: +593 24005089

Website:

Click here to access the site

Data Security Incidents:

E-mail:

security.incidents@ciriontechnologies.com



#### Team Restructuring & New Roles

During 2024 we decided to restructure certain key roles within the company in terms of security, under CIO and CISO, creating specific roles in Policy Risk & Compliance, Platform & Application Security, Corporate Network Security, Internal Red Team and Business Continuity. for a comprehensive approach to cybersecurity.

#### Updated Regulatory Framework

We implemented improvements in our work approach to strengthen cybersecurity according to internal and external assessments and based on the framework of ISO 27001:2022 and NIST practices for information security.

#### Privacy Management

Updating our Privacy Management
Program and implementing improvements
in the Privacy Committee for data
confidentiality, in accordance with local
regulatory updates.



#### Cybersecurity Training

#### High Participation Rate

99% of employees completed annual safety training in 2024.



## New Processes and Tools

#### **BCM Simulations**

More than 150 simulations carried out in incident recovery plans to improve processes and response times.

#### Advanced Security Tools

We integrate 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, for protection against advanced cyber threats.



## 4. OUR TEAM

We believe in the potential of people to generate positive impact. We foster an inclusive environment that promotes the development and participation of teams as key drivers for innovation and sustainable growth.

#### Material Issues:

- Health and Safety
- Training and Development
- Employment Practices
- Diversity, Inclusion and Equal Opportunities





## Highlights 2024

#### +2,200 Employees

Are part of our work teams.

#### **Gender Equity**

In 2024, the gender gap was reduced, increasing the percentage of women to 27%.

#### Overall Engagement of 84%

In our Engagement surveys.

## We Strengthen our First Employment and Internal Development Programs

We strengthened our internship, new leaders, Young Talent Counseling, and Next Generation programs to provide new opportunities for professional growth.

#### **New EHS Policy in Latam**

We standardized our Health, Safety and Environment Policy in Latin America with new regional commitments that are incorporated into our strategic vision for addressing health and safety at work.

#### We Expand our Wellness Initiatives

We incorporated new activities and practices to promote the health and well-being of our employees, including an Employee Assistance Program. We achieved an increase in participation of 54% compared to the previous year.

#### **New Certifications in Diversity**

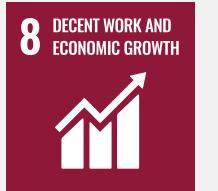
We received the Human Rights Campaign (Campaign for Human Rights) certifications in Argentina and the Company Committed to Diversity and Inclusion by the Sergio Urrego Foundation in Colombia.

## +80 Participants in our Circles of Trust for Diversity

We generate safe spaces for development in Diversity, Equity and Inclusion (DEI), with more than 80 participants actively working in 4 circles on Cultural, Sexual, Generational and Gender Diversity.

#### **CONTRIBUTION TO SDGs**







GOVERNANCE



GRI 2-7; 405-1

## Our Team

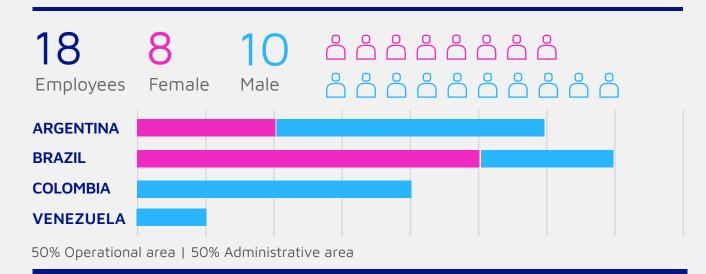
We operate in more than 11 countries, with a team of more than 2,200 people committed to excellence, quality and innovation; and with the support of a management focused on professional development and comprehensive care of the team.

#### **GENDER DIVERSITY BY EMPLOYEE POSITION**

| CATEGORIES             | % FEMALE | % MALE |
|------------------------|----------|--------|
| CEO / President        | 0.0%     | 100.0% |
| VP/a                   | 16.7%    | 83.3%  |
| Director               | 23.1%    | 76.9%  |
| Manager                | 17.2%    | 82.8%  |
| Team Lead              | 25.0%    | 75.0%  |
| Individual Contributor | 27.7%    | 72.3%  |
| Intern                 | 44.4%    | 55.6%  |
| Total                  | 26.6%    | 73.4%  |

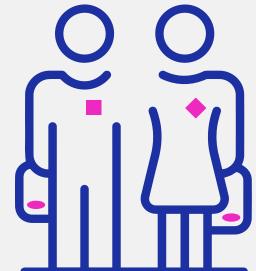
#### Distribution by Country and Gender

#### **PART-TIME EMPLOYEES**



#### **FULL-TIME PERMANENT EMPLOYEES**











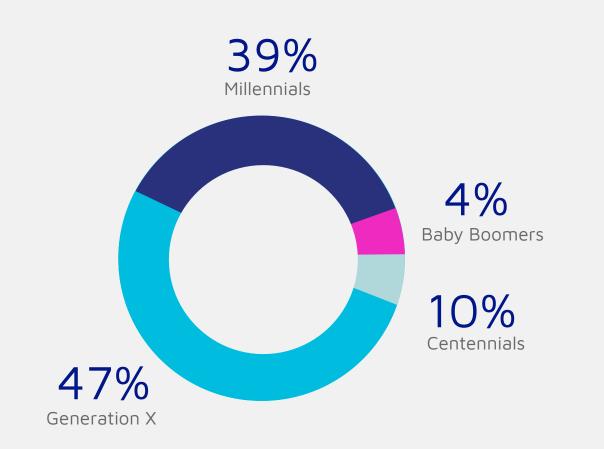
GRI 2-7; 405-1

## Distribution by Generation

The analysis of generational composition reveals key patterns that need to be considered in policymaking, especially in relation to inclusion, well-being at work and technological adaptation. Generational diversity is an essential component of the social dimension. Understanding the proportions and characteristics of each group allows us to design strategies that are more inclusive, resilient and aligned with the challenges of the future of work.

The technology market where we operate, characterized by its dynamism and constant innovation, faces the challenge of integrating a diverse workforce in generational terms.

#### % OF EMPLOYEES PER GENERATION



| GENERATION                              | TOTAL | %    |
|---|-------|------|
| Baby Boomers (Born between 1946-1964)   | 91    | 4%   |
| Centennials (Born from 1997 onwards)    | 216   | 10%  |
| Generation X (Births between 1965-1980) | 1,048 | 47%  |
| Millennials (Born between 1981-1996)    | 884   | 39%  |
| Total                                   | 2,239 | 100% |

The generational distribution of our Team shows a clear predominance of **Generation X** and **Millennials**, which indicates that the workforce is mainly composed of profiles with consolidated experience and high technological adaptability. This combination represents a competitive advantage for the sector, balancing operational knowledge with innovative drive.

The emerging presence of **Centennials** (10%) signals the beginning of a new stage in the organizational culture, marked by values such as diversity, sustainability and native digitalization. Its integration is key to maintaining relevance and competitiveness.

Finally, **Baby Boomers** and their valuable strategic experience, especially in leadership, governance, and mentoring roles, allow us to preserve critical knowledge in our organization.

At Cirion, we value the contribution of all generations, recognizing that diversity enriches our culture and strengthens our capacity for innovation. We create an environment where the talent of each group can thrive, from the experience of the most veteran to the vision of the youngest. Our internship program is a clear demonstration of this commitment to the new generations. We believe that providing meaningful hands-on experiences is essential for the professional development of our future employees and to strengthen their connection to our company. Through these opportunities, we cultivate an environment of continuous learning where young talent can grow, bring new ideas, and become valuable and engaged members of Cirion.





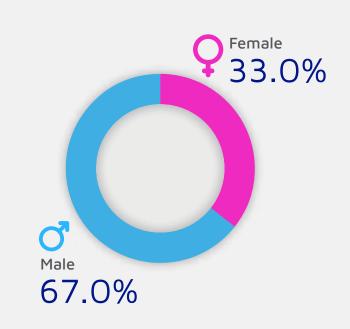
GRI 401-1

## New Hires and Turnover

#### **COLLABORATORS ADDED IN 2024**

By gender and generation

| GENERATION                              | FEMALE | MALE | TOTAL |
|---|--------|------|-------|
| Millennials (Born between 1981-1996)    | 58     | 148  | 206   |
| Centennials (Born from 1997 onwards)    | 62     | 84   | 146   |
| Generation X (Births between 1965-1980) | 35     | 80   | 115   |
| Baby Boomers (Born between 1946-1964)   | 0      | 2    | 2     |
| Total                                   | 155    | 314  | 469   |



#### Generational Diversity in Talent Expansion

Hiring is strongly concentrated in Millennials and Centennials, which reflects a clear commitment to young, digital and adaptable talent. Generation X continues to be incorporated into key roles, as part of a balanced strategy between experience and renewal.

#### Gender Equity

The data for the year show that **female incorporations represent 33% of the total new admissions, and departures minus 26%, which indicates a positive trend towards gender equality** compared to the starting point.

During the period analyzed, the growth of female representation was concentrated in the younger generations. The Centennials and Millennials cohorts were the main drivers of the increase, contributing most of the positive balance of women in the organization.

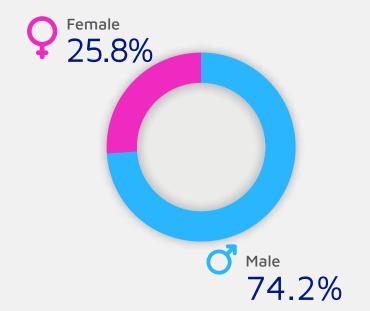
Geographically, female growth was concentrated in **Colombia**, **Brazil and Argentina**, countries that led the net incorporation of women.

This growth reflects the impact of more inclusive recruitment policies and greater openness to diversity.

#### **COLLABORATORS WHO LEFT CIRION IN 2024**

By gender and generation

| GENERATION                              | FEMALE | MALE | TOTAL |
|---|--------|------|-------|
| Millennials (Born between 1981-1996)    | 45     | 141  | 186   |
| Centennials (Born from 1997 onwards)    | 36     | 100  | 136   |
| Generation X (Births between 1965-1980) | 14     | 21   | 35    |
| Baby Boomers (Born between 1946-1964)   | 5      | 26   | 31    |
| Total                                   | 100    | 288  | 388   |







GOVERNANCE

**EMPLOYEES** 



**GRI 3-3** 

## Diversity, Inclusion and Equal Opportunities

We believe that diversity and inclusive leadership are essential to creating an environment of belonging, integrity, and empowerment, free from discrimination, harassment, and retaliation.

To achieve this, we promote the development of key skills for Diversity together with the CEO and leaders throughout the company, covering cultural aspects, gender equality, generations and disability, among others.

In 2024, we redesigned our Circles of Trust to create Employee Resource Groups, made up of employees who proactively work in specialized work groups to promote equity and inclusion practices.

We also implemented mandatory training for all our employees, including key topics such as unconscious bias, diverse families, and inclusive communication.

For the coming years, we are working on new commitments to enhance female leadership in Latin America and increase the percentages of women's participation in our operations.

#### **EMPLOYEE RESOURCE GROUPS (ERG):**

#### Women's Circles

In 2024 we organized meetings with the participation of speakers who facilitated learning and development sessions for female talent.

#### 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. In 2024, we held 6 meetings per circle, culminating in the presentation of action plans open to the entire company, with the support of the Consulting Firm Nodos en DEI.

#### **Recognitions and Certifications**

In 2024 we received the Human Rights Campaign certification in Argentina for our employability program for the LGBTTIQ+ community; and the Sergio Urrego Foundation awarded us the recognition of Company Committed to Diversity and Inclusion in Colombia.





GOVERNANCE



GRI 404-2

## Training and Development

We promote professional growth and leadership through continuous development programs, focusing on adapting to new environments and markets, innovation and excellence:

- Internships: Oriented to university students with potential, with a focus on training in the work environment and soft skills.
- New Leaders: A comprehensive program for new leaders of the organization with tools for soft skills management and people management.
- Young Talent Counseling: A dialogue initiative where referents of the new generations mentor Directors and VPs. In its first edition, young talents guided company leaders, including 11 Vice Presidents and our CEO. These mentors, selected for their experience and proactivity, seek to instruct and advise their mentees (mentees), promoting the achievement of professional goals and the mutual enrichment of skills and knowledge.
- Continuous Talent Development: Periodic training focused on specific topics for high-potential employees.



#### Internships and First Employment - Next Generation Program

We deeply value the potential of new generations and believe that providing meaningful hands-on experiences is essential for their professional development and for strengthening their connection to our company.

This program invites young relatives of our employees to go through their first work experience at Cirion, encouraging the development of innovative projects for growth and mutual learning. Through these opportunities, we cultivate an environment of continuous learning where young talent can grow, bring new ideas, and become valuable and engaged members of the Cirion family.





GOVERNANCE



GRI 404-2

## We generate institutional alliances with social organizations to create more opportunities for personal growth.

In 2024, we participated in the "Cirion+Empujar" activity, which gives young people from vulnerable neighborhoods their first work experience and the opportunity to obtain a permanent position in our operations; and we promote professional practices so that students from public and private schools can learn about the performance of a company like Cirion with our leaders.





### In my own Words: Why "Empujar" Matters

#### Christian Herrera

Participating in "Empujar" reminded me that a first job can change a life, and we can be part of that beginning. This initiative encouraged me to be more committed to the community, and showed me that when we accompany young people, we not only open doors, we also generate the future.

What inspired me the most to join was thinking that someone also accompanied me in my first steps and it was my turn to return that opportunity. These types of activities remind us that our work transcends business: we have the power to transform realities; they connect us with the human and invite us to build a more just society.

During the experience, I accompanied several guys in their first job in the Systems area. With patience, dedication and a great desire to learn, we moved forward step by step. I was able to help them understand not only the technical approach, but also how the dynamics of a formal work environment: how to organize their tasks, communicate with the team, and trust their own abilities. Seeing the evolution was very rewarding, in a short time they were already solving problems, proposing new ideas and bringing real value to the team.

The most beautiful thing was to feel that my help made a difference. There is nothing more motivating than seeing someone grow and begin to shine on their own merits. Accompanying them on that path was an experience that reminded me how important it is to lend a hand when someone is just starting out.





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

## Training and Technical Development

Annually, we generate training and technical training plans for all our professionals. In 2024 we implemented the following courses and programs:

- 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: Training on platforms and tools from leading companies to maintain technical competence and operational excellence.
- LinkedIn Learning: We have 300 LinkedIn Learning licenses (LinkedIn Platform Learning Program) that allow the hard and soft development of our employees.
- INE: We have 65 licenses from INE, a technical training platform specialized in Cybersecurity, technical certifications, Networking and Cloud.
- Digital House Program: We carried out 3 synchronous Artificial Intelligence courses together with Digital House.
- Other Technical Training: We offered trainings in data modeling, analytics, and Power Bl.

#### **AVERAGE TRAINING HOURS IN 2024**



10.6 hours

68%



#### **BY CATEGORY**



8.5 hs

10.0 hs

8.4 hs



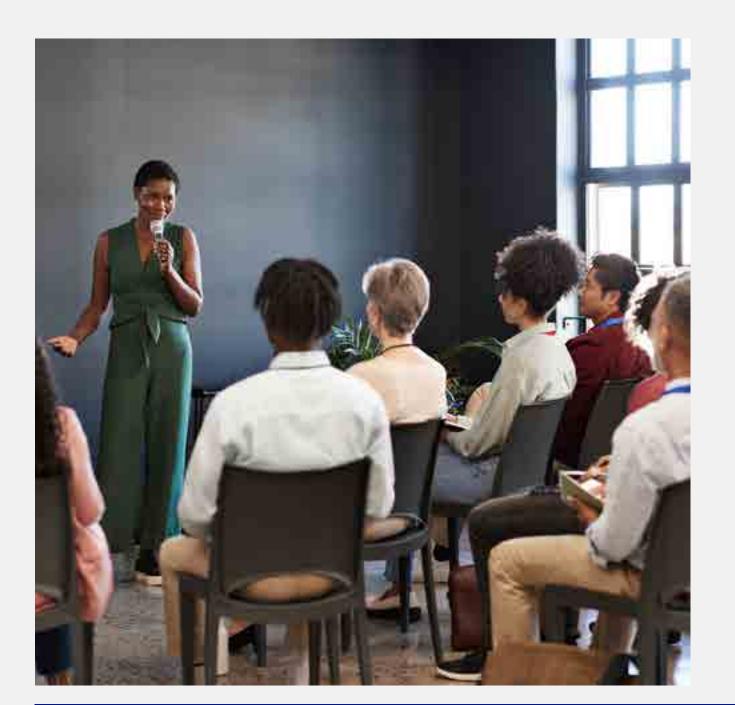


GRI 404-3

# Work Environment, Performance and Continuous Improvement

In line with training and professional development initiatives, we seek to enhance the skills and promote the growth and integral development of the leaders and teams that work at Cirion. Through spaces for evaluation, mentoring and coaching, we address specific needs and opportunities with a strategic approach:

- Semi-annual Employee Engagement (EES) survey to receive feedback and guide training strategies.
- A six-month "Low Performers" program, through which we provide feedback and define individual action plans to improve performance.
- Regular performance evaluations.







Overall Engagement, driven by favorable responses to core engagement metrics, including employee advocacy, pride in belonging to Cirion, and a sense of personal fulfillment derived from their roles.

#### **CONTINUOUS IMPROVEMENT APPROACH**

Performance evaluations are carried out on 100% of employees and allow us to measure their contribution to the company's objectives, quality standards, corporate values and expected behaviors with a focus on continuous improvement.





GOVERNANCE



GRI 2-19; 2-20

# Compensation Aligned to Performance and Growth

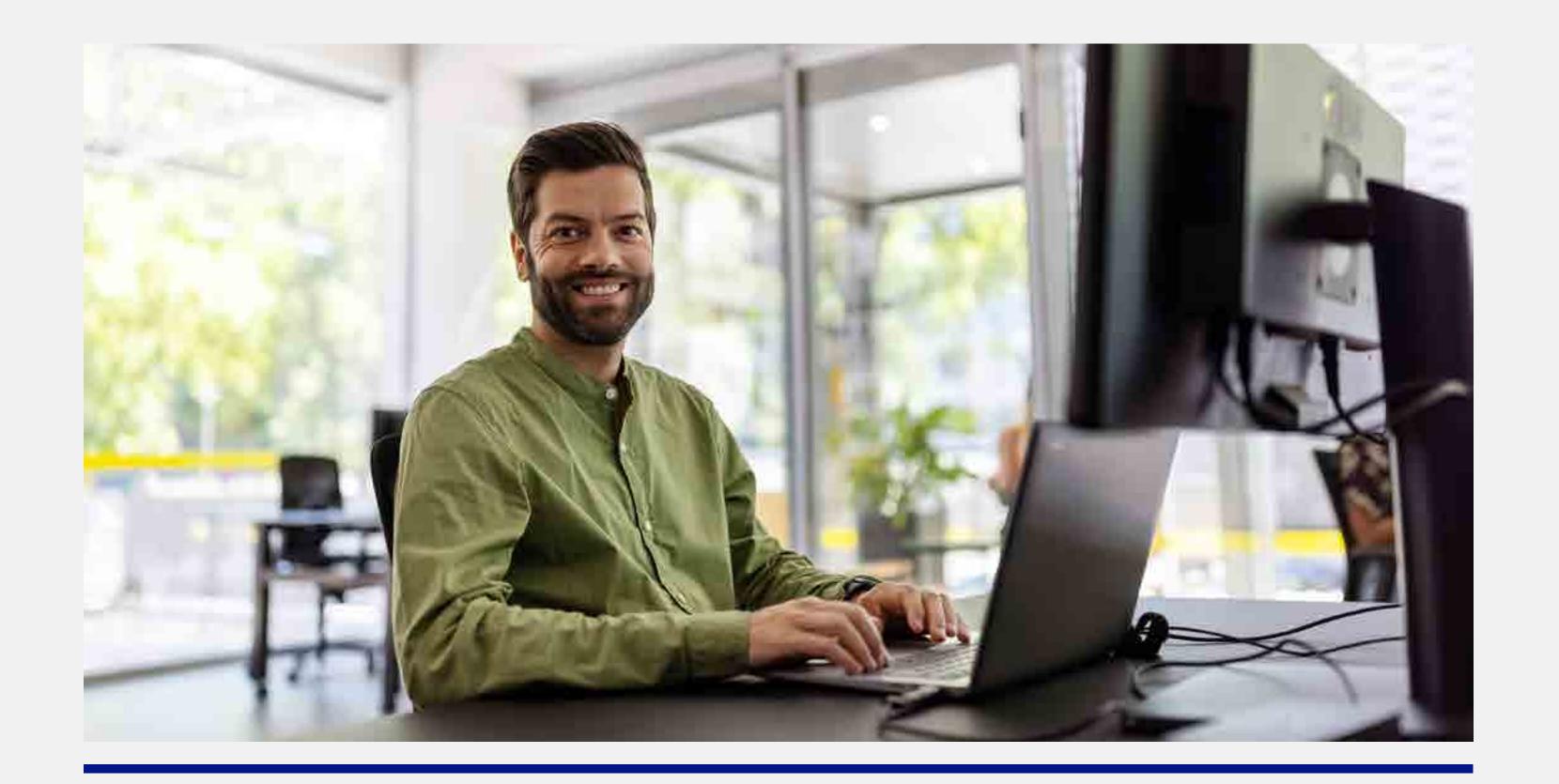
Our remuneration policy is based on a clear and equitable structure, with salary scales defined according to career level, role performed and professional discipline. To encourage the fulfillment of objectives and recognize individual contribution, we incorporate bonus schemes differentiated by hierarchy, linking compensation directly to performance and productivity.

We have a variable compensation system for the sales and presales teams, designed based on the company's sustained growth and measured through performance indicators and monthly revenues.

Review of the salary structure, validation of annual bonuses and definition of CEO and executive compensation are in charge of the Compensation Committee – integrated into the Board of Directors – together with the Human Resources team. Salary adjustments are evaluated and approved by managers and the executive team.

To ensure external competitiveness, we conduct comparative market studies with the support of specialized consultants. In 2024, we incorporated the Success Factors Compensation tool, which allows each Manager to manage the salary increases of their teams efficiently, optimizing the use of the budget and promoting high performance.

The Success Factors Compensation system has had a major impact on salary reviews, ensuring that adjustments are approved by managers and the executive team. During 2024, this tool allowed each manager to manage the increases of their teams efficiently, managing the budget and promoting the best performances.





GRI 401-2; 403-6; 403-10

# Well-being in our Work Environment

We implement several practices to promote the comprehensive care and physical and emotional well-being of our employees in all its aspects, contributing to the creation of a work environment that is not only productive, but also healthy, safe and conducive to the development of people.

In 2024, our Wellness plans were focused on:

- Initiatives to improve ergonomics and the optimization of spaces, with new work elements, facilities and amenities in coworking offices.
- Improvements for the transfer and transport of employees, including combis systems and telemetry for road safety.
- In-person gatherings such as 'The First Morning Coffee' to promote socialization and exchange between teams and shared areas.
- Active breaks, stretching, yoga and mindfulness sessions through the A+B space in our offices, guided by experts, to reduce stress and improve focus.
- Promotion of physical activities and talks with professionals specialized in sports and health.
- Sports challenges, races, and walks with social and environmental purposes.
- Awareness and disease prevention campaigns. Training in everyday tools and soft skills, such as time management and conflict resolution.
- Cultural integration celebrations, including "Día de los Muertos", Halloween, and Thanksgiving, among others.

We have a free and confidential Employee Assistance program, made up of a network of specialized professionals who advise employees and family members in the resolution of personal or work situations, including:

- Counseling to manage stress, anxiety, and other emotional challenges.
- Nutritional guidance and healthy habits.
- Financial advice for better money management.
- Legal guidance on personal and work issues.





PSYCHOLOGICAL COUNSELING



**LEGAL GUIDANCE** 



FINANCE AND ACCOUNTING ADVICE



**GUIDANCE** 



PET CARE



GRI 3-3; 403-1

# Health and Safety

#### Our commitments

- Legal Compliance: We ensure compliance with applicable legal requirements and those demanded by our clients.
- **Hazard Elimination**: Our employees and contractors are committed to carrying out activities with the established risk control measures.
- **Promoting Self-Care**: We aim to raise awareness among employees about health care through a comprehensive approach.
- Quality of Work Life: We ensure that our workspaces are safe for our employees, thereby preventing workplace accidents and illnesses.
- Training and Awareness: We provide the necessary training and education in Safety, Health, and Environment for all employees and contractors.
- Safety Culture: We promote a culture of care and prevention as a shared responsibility, adopting zero tolerance toward unsafe acts.
- Adequate Resources: We allocate the necessary resources for the planning, implementation, and evaluation of the Safety, Health, and Environment Management System.
- **Healthy Lifestyles**: We promote healthy lifestyles through various programs and initiatives.





20 hours of training per year, with a total of 161 attendees

The Health, Safety and Hygiene (EHS) team leads the planning and implementation of occupational safety and environmental protection practices throughout our operations, as well as the monitoring and evaluation of our Occupational Health and Safety Management System, developed based on local regulations and ISO 45001 standards.

Meanwhile, the Joint Committee on Occupational Health and Safety ensures engagement and dialogue between employee representatives and management, with the goal of fostering collaborative decision-making. In every country where we operate, a Health and Safety Committee supports all EHS initiatives.

In 2024, we also established our regional commitments by standardizing our **EHS Policy** across Latin America, complemented by our Alcohol and Drug Prevention Policy, Road Safety Policy, and Contractor Handbook.





GRI 3-3; 403-2; 403-4; 403-5

# Safety Culture, Prevention and Risk Management

To prevent and address the management of potential risks related to health and safety in the workplace, we carry out comprehensive assessments and define concrete action plans in operations:

- Periodic safety inspections were carried out at nodes and administrative and technical facilities, in collaboration with the Real Estate and Operations departments. Based on these evaluations, in 2024 we identified improvement opportunities related to ergonomics, hydration stations, ACPM containment dikes, signage, and lighting systems, among others.
- Priority risk protection and prevention programmes and safe work procedures for activities such as tasks at heights, electrical risk, confined spaces and road safety.
- **Risk training** with courses and certifications for tasks identified as high-priority risks.
- Training and drills on emergency simulations, along with corresponding action plans and rapid response protocols for each scenario.
- Training of internal brigades in first aid, evacuation and fire control.
- Certification of telecommunications tower lifelines with respect to the mitigation and control of high-risk activities.

In addition, employees can proactively submit concerns, opportunities, or complaints regarding occupational hazards or risks through the Integrity Line.



We were recognized in Ecuador by the Ministry of Public Health as pioneers in obtaining certification for a Healthy Work Environment under the "Activate y Vive" program. Our committees and emergency brigades actively participated by organizing health campaigns and conducting inspections.

#### **TOTAL FREQUENCY OF RECORDABLE INJURIES**







GRI 3-3; 403-2; 403-4; 403-5; 403-9; 403-10

# Safety Culture, Prevention and Risk Management

We complement risk management initiatives with the strengthening of an occupational health and safety culture that promotes participation in all stages of the management system, from planning to the identification of improvements.

As part of our preventive approach, all employees participate annually in the Occupational Health and Safety Training Plan. This program is complemented by more than 20 specific trainings, designed in conjunction with representatives and the Occupational Health area, which include content aimed at:

- Risk identification and management
- Occupational Illnesses and Injuries
- Use of fire extinguishers
- Accident prevention (chemical, electrical and other risks)
- First aid
- Emergency procedure

During 2024, we strengthened the EHS content on our intranet to facilitate access to information, and we launched a monthly newsletter that communicates achievements, scheduled activities, and relevant news in the area.



## Living the Values: Health, Safety, and Sustainability at Cirion

Juan Paulo Díaz Alcántara

I started in April 2010 in the Environmental, Social and Governance (ESG) project and 15 very rewarding years have passed of working with very professional people. In addition, I am very proud to contribute to health care, the safety of people and the mitigation of the impact on the environment. All this leaves me with wonderful sensations, worthy of a passion that I carry with me during my professional stage.

A few years ago, the company chose very wisely to design and develop the ESG project, consisting of the collection of data and information, to develop environmental, social and governance strategies.

These are currently reflected in our annual sustainability report. I am pleased to share my experience and continue to be part of this team, which seeks to improve Cirion's performance and commitment in these three key areas.

Our short-term goal as an EHS team is to extend the reach of our Safety, Health and Environment Management System to the new Data Centers in Lima and Santiago. We seek to continue our communication strategy for programs and campaigns that promote the prevention of occupational injuries and illnesses.

I invite all of us who are part of Cirion to continue to participate in these good practices, aimed at reducing our carbon footprint and remaining committed to ensuring that Cirion continues to be a safe and healthy workplace.





GRI 403-3; 403-6

# Health Services

In addition to preventive practices in operations, we promote selfcare spaces and initiatives for all our employees:

- Ergonomic evaluations in the workplace, which allowed us to reduce symptomatic cases of musculoskeletal disorders by 6%.
- Periodic occupational exams to accompany health care.
- Occupational risks monitoring, including lighting improvements.
- Frequent communication campaigns focused on care practices: prevention of respiratory diseases, cancer prevention, hearing care, active breaks, etc.
- Voluntary blood donation campaigns.
- Specific prevention webinars, aimed at hearing health, mental health, ergonomics, etc.

In 2024, we offered virtual and face-to-face activities during Safety, Health, and Environment Week to promote environmental care practices and prevention of accidents and occupational diseases. We achieved an increase in participation of 54% compared to the previous year.





# 5. OUR ENVIRONMENTAL APPROACH

We aim to promote a conscious digital transformation with sustainable practices for efficiency and decarbonization.

#### Material Issues:

- Energy Efficiency and Renewable Energies
- Greenhouse Gas Emissions, Air Quality and Carbon Footprint
- Waste Management, Co-processing and the Circular Economy





# Highlights 2024

#### 100% Renewable Energy Sources Goal

We define that each new Data Center that comes into operation does so under a goal of 100% renewable energy supply.

Through the acquisition of IRECs certificates, we guarantee 100% renewable energy for our Data Centers in Peru, Brazil, Colombia and Chile.

# Expansion of Renewable Energies in More Data Centers

25% of the energy consumption of our Data Center in Artigas, Argentina, and 35% of the Data Center in Carcelen, Ecuador, are covered by the acquisition of Renewable Energy Certificates (RECs).

#### **Strengthening GHG Measurement**

We continue to strengthen our monitoring and measurement processes through the Resource Advisor tool, streamlining the monitoring, collection and consolidation of data, as well as for the calculation of our greenhouse gas (GHG) emissions in an accurate and automated manner.

#### **Water Consumption**

While our operations are characterized by a low reliance on water-intensive systems, given the increasing use of emerging services, such as artificial intelligence, we anticipate designing innovative alternatives for water management for future expansions and new operations.

#### Reducing our Scope 1 Emissions

We achieve the reduction of scope 1 emissions as a result of replacing refrigerants with more efficient and environmentally friendly options, combined with a lower equipment failure rate.

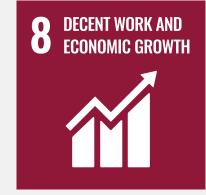
#### **Reducing our Scope 3 Emissions**

Scope 3 emissions showed a reduction of 15% compared to 2023, mainly due to the decrease in Categories 1 and 2, which are the ones with the greatest impact on inventory, but also in other categories.

#### **CONTRIBUTION TO SDGs**















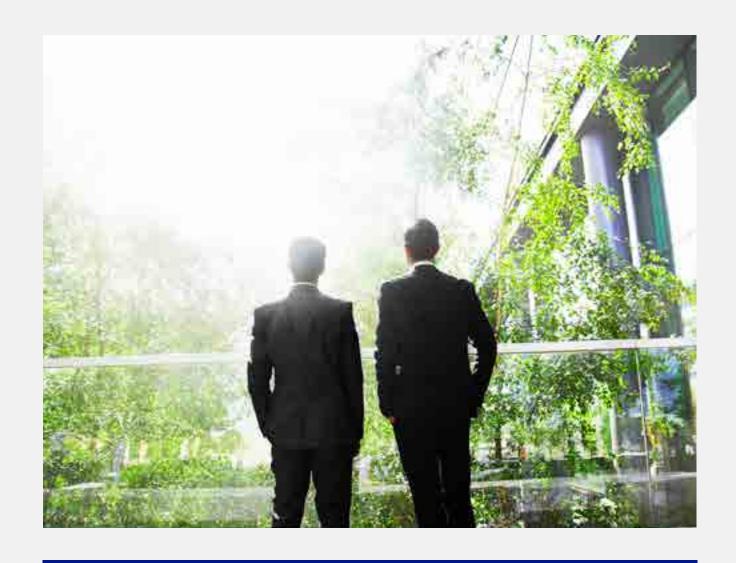
**GRI 3-3** 

# Committed to the Environment

At Cirion, our vision for the future is intrinsically linked to climate action.

We recognize the urgency of addressing climate change and reaffirm our commitment to embed sustainability at the heart of our business strategy, addressing risks and opportunities through innovative solutions to enhance positive impacts and reduce our organizational footprint.

To achieve this, we integrated ISO 14001 and 45001 certifications into our Environmental Management System in seven key countries in the region: Argentina, Brazil, Chile, Colombia, Ecuador, Mexico, Peru.



#### Our Environmental Management:



# Energy efficiency and renewable energies

We strengthen our actions to operate more efficiently, with a focus on reducing energy consumption and the progressive incorporation of renewable energies in our infrastructure.



# Decarbonization and carbon footprint

We build a more resilient and sustainable future, where carbon management is a priority in every decision we make.



#### Risk mitigation

We work to ensure the respect and preservation of local ecosystems, minimizing our footprint.



#### Water

We manage the use of water with criteria of efficiency and care within the framework of our current operations, projecting innovative and technological solutions for the future.



# Circular economy and waste management

We promote circularity practices for the separation and management of materials and waste, with a focus on continuous improvement.



# Environmental culture and awareness

We promote an environmental culture within the organization, with specific training, participation and follow-up actions that involve all areas.





**GRI 3-3** 

# Our Methodological Approach

To measure our energy consumption and emission factors, we use methodologies, tools and sources recognized nationally and internationally:

- Paris Agreement
- United Nations Framework Convention on Climate Change
- IPCC Intergovernmental Panel on Climate Change (AR6).
- GHG Protocol
- International Energy Agency (IEA).
- U.S. EPA Best Practices
- Best practices by Defra UK
- CAMMESA (Compañía Administradora del Mercado Mayorista
- Eléctrico S.A.) for our operations in Argentina.
- National Energy Commission of Chile.
- Mining-Energy Planning Unit (UPME)
- Ministry of Energy and Mines of Ecuador
- SEMARNAT of Mexico
- US Residual Mix (Green-e Energy Emissions Rates)
- Panama's Ministry of Energy

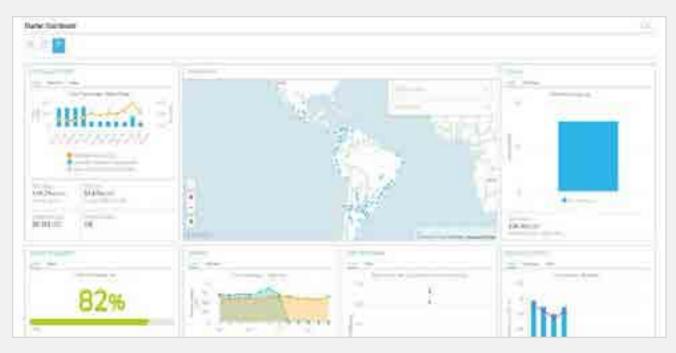
In the context of our environmental assessment, we include direct and indirect emissions, as well as biogenic emissions, and we contemplate the purchase of renewable energy certificates (I-RECs). We are guided by the guidelines of the GHG Protocol Corporate Accounting and Reporting Standard and the GHG Protocol Guide for Scope 2 Emissions.

In 2023, we implemented the Resource Advisor tool to strengthen and streamline the monitoring, collection and consolidation of data, as well as for the calculation of our greenhouse gas (GHG) emissions in an accurate and automated manner

This platform allowed us to significantly improve the efficiency and accuracy in the management of our emissions inventory, facilitating real-time monitoring and reducing the time invested in these processes to advance on our path to decarbonization.

Systematic measurement of our carbon footprint allows us to accurately track emissions associated with energy and fuel consumption across our operations. This process, supported by integrated data management, enables the real-time development of our emissions inventory, optimizing time and resources. Over time, this methodology helps us identify improvement opportunities, evaluate the impact of our mitigation initiatives, and strengthen our sustainability strategy.







GRI 3-3; 201-2; 302-1

# Energy Efficiency and Renewable Energies

#### Powering a Sustainable Energy Future

Year after year, we renew our commitment to transforming our operations toward greater sustainability, strengthening our energy efficiency efforts and promoting the adoption of renewable energy across our infrastructure.

In line with these goals, we have implemented a series of measures to optimize energy consumption in each operation:

- **Efficient Design**: All new projects incorporate LED lighting and smart automatic shut-off systems.
- Responsible Planning: We conduct thorough environmental impact assessments and risk analyses for every new energy project.
- Continuous Training: We invest in the training and modernization of our teams, promoting awareness of energy savings and responsible resource use.
- Smart Optimization: We have implemented DCIM (Data Center Infrastructure Management), which enables continuous and efficient consumption monitoring, optimized through artificial intelligence applications.

# Risks and Opportunities Arising from Climate Change

At Cirion, we are committed to a transition toward renewable energy as a strategic approach to ensure business continuity and to manage risks and opportunities associated with the impacts of climate change.

This initiative allows us to mitigate financial risks linked to energy price volatility and potential future regulations. At the same time, it prepares us for climate-related challenges, such as extreme weather events, which increase the likelihood of power grid failures and may jeopardize the continuity of our operations.

For example, power outages in Data Centers can represent critical disruptions. Electricity powers our servers, cooling systems, and network equipment; even a brief interruption can lead to data loss, service downtime, and significant damage. For this reason, securing our power supply is an absolute priority.

To ensure a more stable and resilient energy supply, we have made strategic investments—such as connecting our Cotia Data Center to higher-tier power grids sourced from renewable energy, which offer greater reliability and fewer outages.

By investing in renewable energy, we not only reduce our carbon footprint but also strengthen our ability to deliver uninterrupted service, ensuring that our clients' data and operations remain protected regardless of external weather conditions.

Our Landing Stations 100% by powered by IREC-certified energy include: Santos, Rio de Janeiro y Fortaleza in Brazil, Punta Bazan in Colombia, and Lurin in Peru.

As part of our decarbonization strategy, we have initiated a transition so that each of our data centers operates with a goal of 100% renewable energy. This strategic decision mitigates the financial risks associated with energy price volatility and future regulations, while strengthening our position in the market.

Committed to continuous improvement, through the acquisition of IRECs certificates we guarantee 100% renewable energy for our Data Centers in Peru, Brazil, Colombia and Chile. In addition, we are extending this commitment to our Data Centers in Argentina and Ecuador, where we have already begun the transition and cover more than 20% of energy consumption.

Our Landing Stations 100% by powered by IREC-certified energy include: Santos, Rio de Janeiro y Fortaleza in Brazil, Punta Bazan in Colombia, and Lurin in Peru. In addition, we have agreements for the provision of solar energy in our fiber optic network in Brazil, ensuring 100% solar energy in the Long Haul Southeast and South routes.

#### **Ongoing Strategic Projects**

In the Brazilian market, we are working to enter into direct longterm self-production contracts with sustainable energy generators, proposing an agreement that allows us to directly choose our source of energy supply.





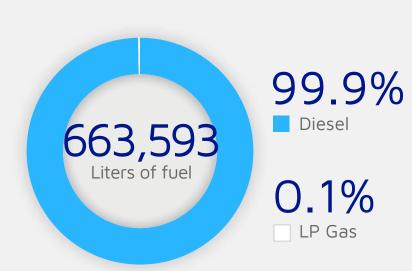


GRI 302-1

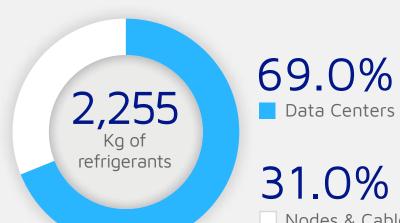
# Greenhouse Gas Emissions, Air Quality and Carbon Footprint

Fuel and Refrigerant Consumption in Operations (Scope 1)

#### STATIONARY COMBUSTION



| Liters per Fuel        |         |        |
|------------------------|---------|--------|
| SITE TYPE              | DIESEL  | LP GAS |
| Data Centers           | 440,485 | 0      |
| Nodes & Cable Stations | 222,242 | 484    |
| Offices                | 381     | 0      |
| Total                  | 663,109 | 484    |



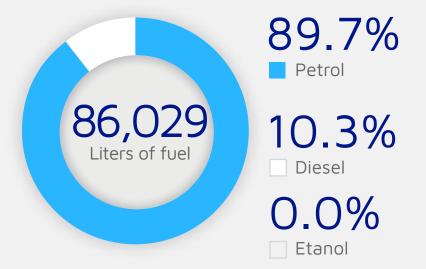


Nodes & Cable Stations

#### Kilograms per Coolant

| SITE TYPE              | HFC-407C | HFC-410A | HFC-422D | HCFC-22 | OTHERS |
|------------------------|----------|----------|----------|---------|--------|
| Data Centers           | 224      | 672      | 26       | 651     | 0      |
| Nodes & Cable Stations | 107      | 437      | 0        | 137     | 1      |
| Total                  | 330      | 1,109    | 26       | 788     | 1      |

#### MOBILE COMBUSTION



#### Liters per Fuel

| VEHICLE        | DIESEL | PETROL | ETHANOL |
|----------------|--------|--------|---------|
| Administrative | 0      | 65,993 | 0       |
| Operative      | 8,867  | 11,169 | 0       |
| Total          | 8,867  | 77,163 | 0       |



The modernization of air conditioning systems, incorporating environmentally friendly refrigerants and a lower failure rate, has facilitated a significant reduction in refrigerant consumption and in the volume of emissions released into the atmosphere

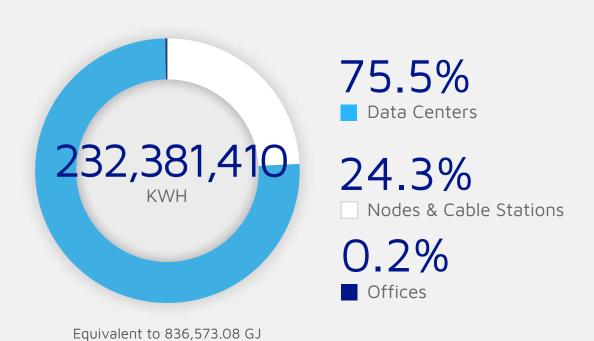


GRI 302-1

# Greenhouse Gas Emissions, Air Quality and Carbon Footprint

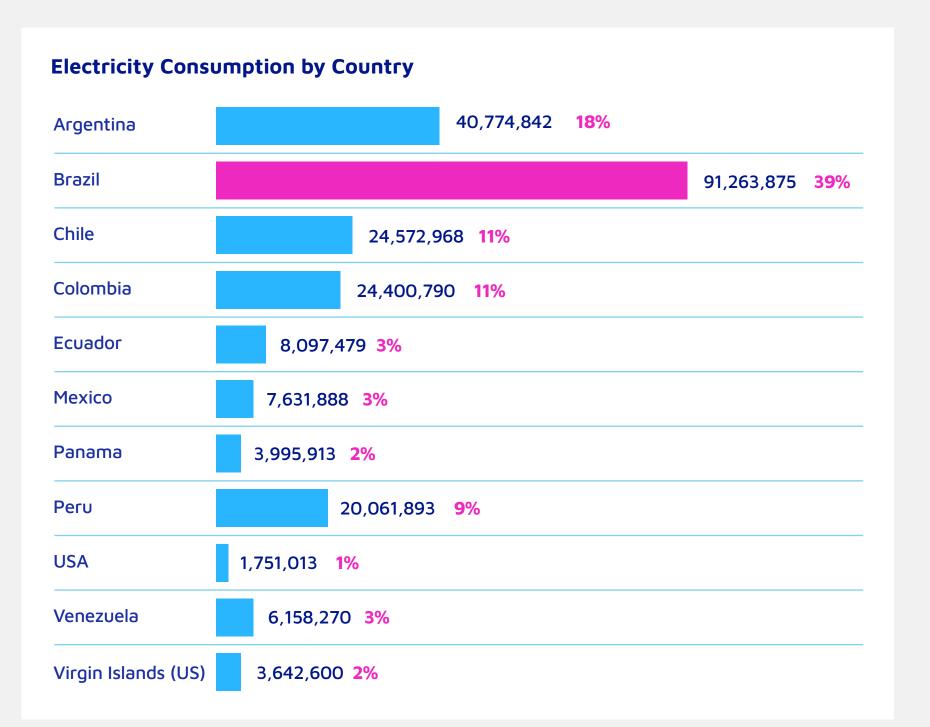
**Energy Consumption (Scope 2)** 

#### **ELECTRICITY CONSUMPTION**



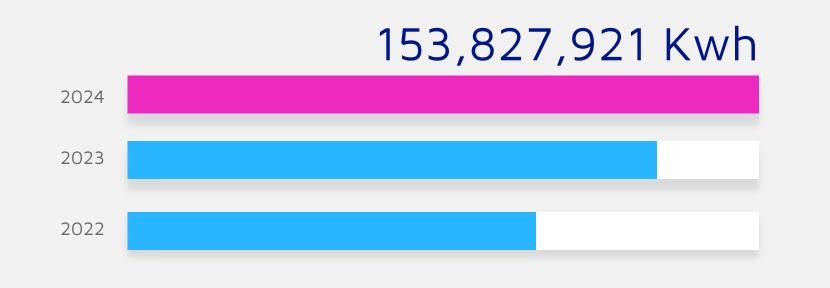
#### **Electricity Consumption by Site Type**

| SITE TYPE                   | KWH         | %     |  |  |
|-----------------------------|-------------|-------|--|--|
| Data Centers                | 175,426,663 | 75.5  |  |  |
| Nodes & Cable Stations      | 56,494,843  | 24.3  |  |  |
| Offices                     | 459,904     | 0.2   |  |  |
| Total                       | 232,381,410 | 100.0 |  |  |
| Equivalent to 836,573.08 GJ |             |       |  |  |



#### **ELECTRICITY CONSUMPTION FROM RENEWABLE SOURCES**









GRI 305-1; 305-2; 305-5

# Greenhouse Gas Emissions, Air Quality and Carbon Footprint

YEAR OVER YEAR

**EMISSIONS** 

#### Scope 1 and 2 (total operations)



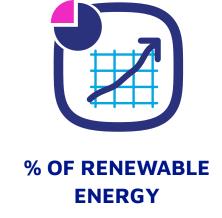
During 2024, direct greenhouse gas (GHG) emissions corresponding to Scope 1 totaled 6,724.96 tCOeq., including CO2 and HFCs.

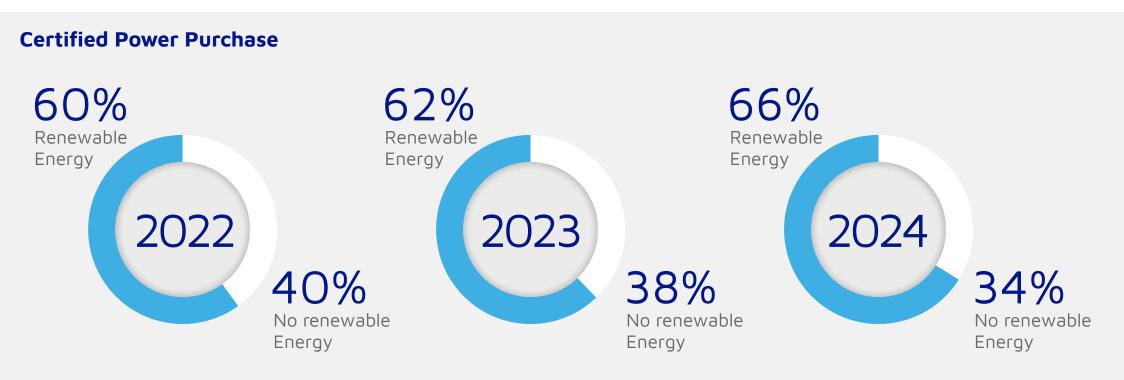
A 24% reduction was achieved thanks to the replacement of refrigerants with more efficient and environmentally friendly alternatives, combined with a lower equipment failure rate

Regarding Scope 2, energy consumption-related emissions totaled 18,576.71 tCO<sub>2</sub>eq, representing a 2% decrease.

No biogenic CO<sub>2</sub> emissions were generated during the reporting period.







In 2024, we expanded our purchase of I-REC certificates to Argentina and Ecuador, in addition to our existing acquisitions in Brazil, Chile, Colombia, and Peru. Through our solar energy contracts, a total of 2.2 GWh was generated in Brazil.

\*Market-based emissions in tCOeq.

**CARBON EMISSIONS** 



GOVERNANCE



GRI 302-1; 305-1; 305-2; 305-5

# Greenhouse Gas Emissions, Air Quality and Carbon Footprint

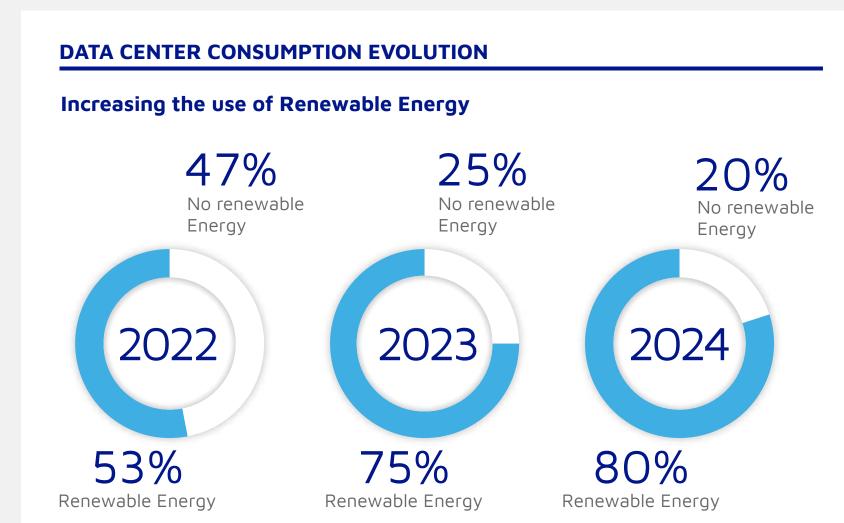
# Consumption and Emissions Data Centers

Aligned with our business objectives, we analyzed the evolution of consumption and emissions generated in our Data Centers in order to identify improvement opportunities for impact reduction.

At these sites, we implemented an infrastructure management system that incorporates Artificial Intelligence to optimize PUE (Power Usage Effectiveness).

In addition, we aim to enhance processes through a continuous improvement approach, supported by infrastructure initiatives such as room containment, which enabled a 30% improvement in energy efficiency.

In 2024, our Data Centers in Artigas, Argentina, and Carcelen, Ecuador, transitioned to the use of renewable energy through the acquisition of Renewable Energy Certificates (RECs), covering 25% and 35% of total energy consumption, respectively.





| SCOPE   | ТҮРЕ                 | UOM    | 2022        | 2023        | 2024        | YOY%  |
|---------|----------------------|--------|-------------|-------------|-------------|-------|
| Scope 1 | Fuels                | liters | 246,867     | 218,092     | 442,515     | 102.9 |
| Scope 1 | Refrigerants         | kg     | 2,793       | 2,472       | 1,573       | -36.4 |
| Scope 2 | Electric Power Total | kWh    | 160,197,460 | 171,018,753 | 175,426,663 | 2.6   |
| Scope 2 | Renewable Energy     | kWh    | 84,490,827  | 127,703,033 | 140,504,026 | 10.0  |

# Scope 2 Scope 1 -27% 20,000 15,000 13,687 10,000 5,519 5,555 4 472

2023

2024

**DATA CENTER SCOPE 1 AND 2 EMISSIONS** 

2022

Market-based emissions in tCOeq.





GRI 305-3; 305-5

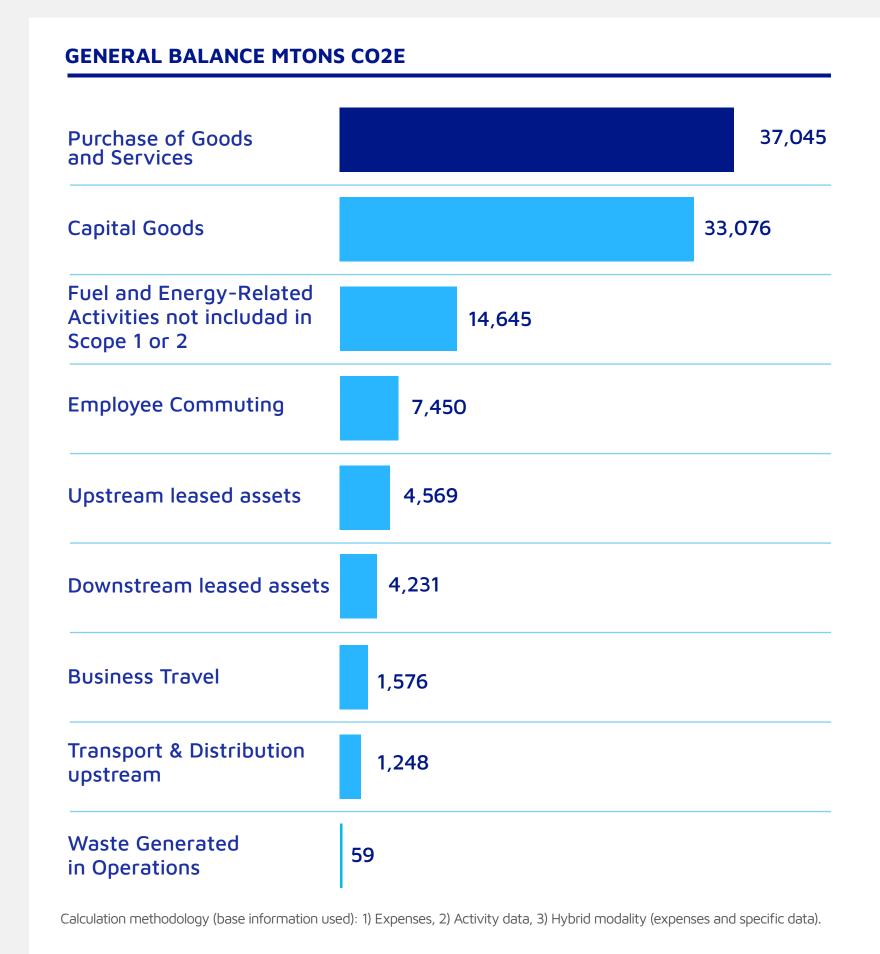
# Greenhouse Gas Emissions, Air Quality and Carbon Footprint

#### Scope 3

As a core element of our operations, we have continued for a second consecutive year to analyze and manage our Scope 3 emissions, recognizing that they represent the largest share of our carbon footprint and a cross-cutting challenge for the industry. We remain committed to strengthening our emissions inventory to support the design and implementation of effective mitigation measures.

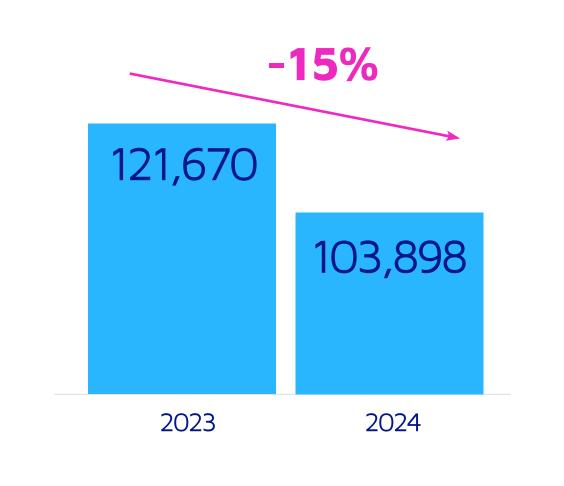
We also continue to strengthen the monitoring and transparency of data related to our value chain, which enables us to set realistic targets and move toward a significant reduction in our indirect emissions.

We aim to create shared value with our suppliers and promote sustainable practices that enhance the use of decarbonization mechanisms and tools that are effective, verifiable, and scalable, supporting the transition toward a low-carbon economy.



Scope 3 emissions showed a 15% reduction compared to 2023, primarily due to decreases in Categories 1 and 2, which continue to represent the highest impact within the inventory.

#### **YoY Evolution - Absolute Emissions**





**GRI 3-3** 

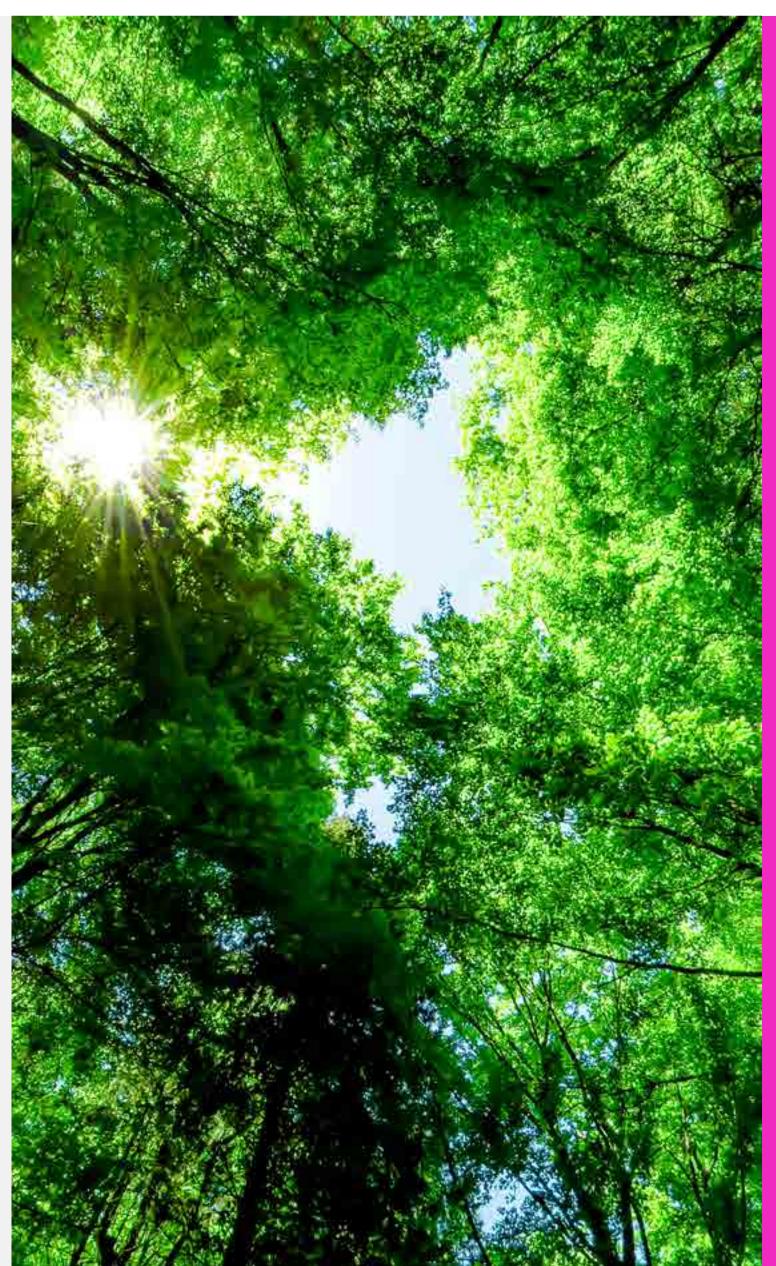
# Greenhouse Gas Emissions, Air Quality and Carbon Footprint

#### Advancing Decarbonization and Environmental Management

Following the inclusion of scope 3 in our carbon footprint measurement, during 2024 we are deepening our actions to mitigate inherent emissions, especially in refrigerant management and energy consumption:

- Refrigerant Management: we are making progress in the transition towards greener alternatives. Thanks to the implementation of refrigerant changes, combined with a lower equipment failure rate, we achieve a significant reduction in consumption. Retrofits were also made in 28 units to optimize their efficiency.
- Carbon Footprint: We continued scheduled monthly inspections and maintenance to prevent gas and oil leaks, and emissions measurements were maintained on our power generation equipment. We also implemented new systems to alternate the use of generator sets, which resulted in fuel savings and a consequent decrease in gas emissions.
- Air Quality: through regular maintenance and conservation of our equipment, we ensure efficient and responsible operation, minimizing our impact on air quality. In 2024, the results obtained confirm regulatory compliance, without registering significant effects on the environment or the surrounding communities.

For next year, we intend to start defining decarbonization targets to set a clear roadmap for reducing our carbon footprint. This process will involve an analysis of our operations so that the goals are aligned with operational efficiency and its impact on the business, including both the use of resources and the management and reduction of emissions for long-term competitiveness.





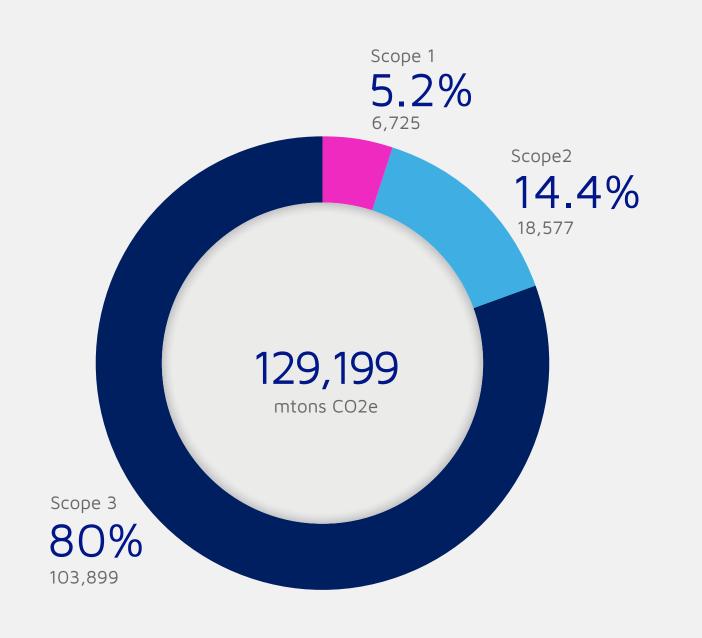
GRI 302-1; 305-1; 305-2; 305-3; 305-4; 305-5

# Greenhouse Gas Emissions, Air Quality and Carbon Footprint

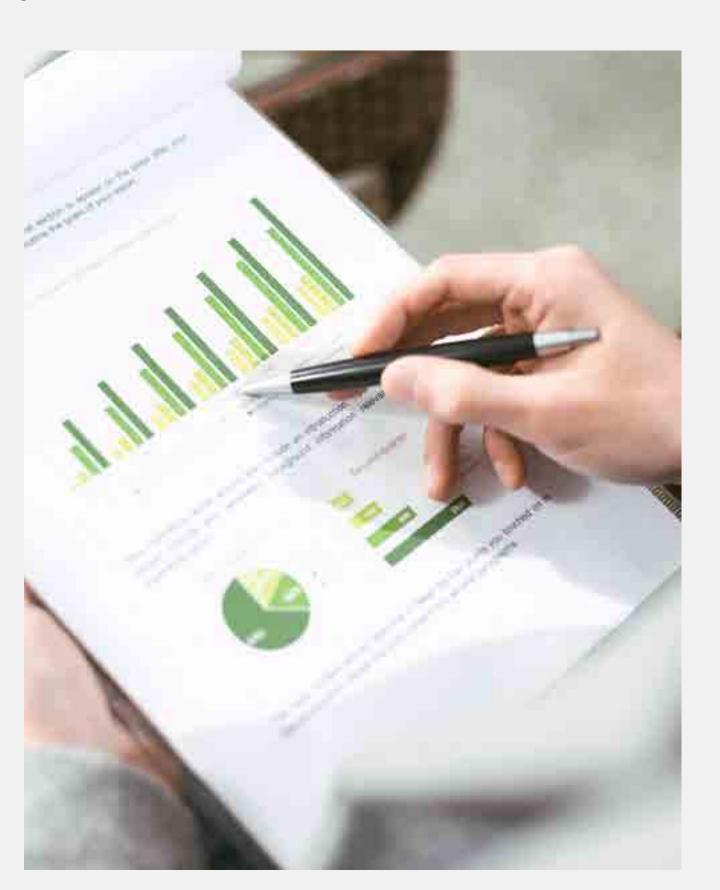
#### Total Emissions (Scope 1, 2 and 3) Emissions Intensity

Aligned with Development Goals Sustainable Development (SDG), Cirion continues to make progress in the annual assessment of its carbon footprint, gradually improving its processes and reaffirming our commitment to reducing its emissions, which is evidenced by a 14% decrease compared to the previous year.

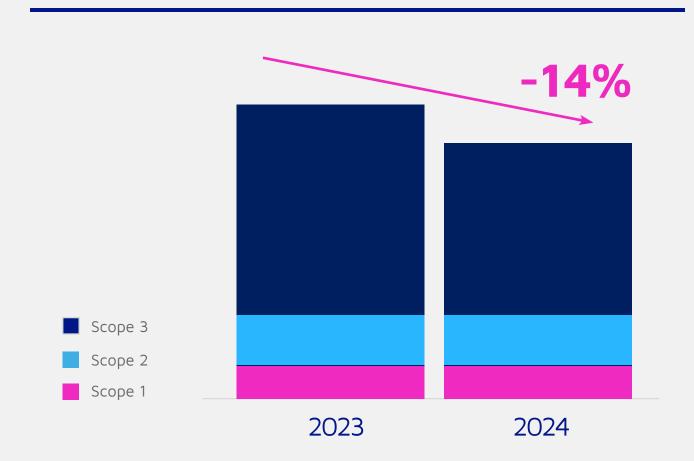
#### **CIRION GHG EMISSIONS BY SCOPE**







#### **TOTAL GHG EMISSIONS SCOPES 1, 2, AND 3 YOY**



#### **EMISSIONS INTENSITY**

Measured through the ratio of tons of CO2e per 100,000 USD of revenue, as an indicator of efficiency in relation to the business, sustained progress is also observed.

|                 | 2023      | 2024      |
|-----------------|-----------|-----------|
| Total Emissions | 149,546.5 | 129,199.4 |
| Per 100,000 USD | 17.04     | 16.13     |





**GRI 3-3** 

# Mitigating Environmental Risks

#### **Biodiversity**

When launching a new project—such as concession renewals or new fiber optic installations—we conduct a range of environmental evaluations and impact analyses in accordance with local jurisdictions and regulations. These assessments aim to prevent and/or minimize any potential adverse effects on ecosystems and biodiversity. They include a series of criteria related to the site's physical and meteorological conditions, regulatory requirements and permits, geomorphological stability, and impacts on water, land, flora, and fauna, among others.

#### Oceanographic Studies

In 2024, we carried out an evaluation of this kind in Punta Bazan (Buenaventura, Colombia) for the SAC Segment H cable, with the objective of understanding its interaction with the aquatic environment. This study explored factors such as bathymetry, topography, wave dynamics, tides, sea level, and surface currents. Similar coastal and subaquatic assessments were conducted in St. Croix, U.S. Virgin Islands, United States, as part of the renewal process for the submarine cable landing permit at that site (for the MAC and SAC cables).

Collectively, these analyses confirmed that the dynamic conditions of water and atmosphere do not pose a significant threat to coastal edge stability or to the integrity of the submarine cable system.

#### Terrestrial Impacts in Coastal Areas

Depending on the project, we analyze terrain characteristics through topographic surveys, evaluating elements such as constructions, trees, vegetation, soil composition, and stability. In 2024, we conducted these assessments for our projects in Punta Bazan, Colombia, and Las Toninas, Argentina, with the goal of ensuring the preservation of the coastal environment, its stability, and the protection of dune and beach ecosystems.



#### **Water Consumption**

Currently, our operations are characterized by low reliance on water-intensive systems, thanks to the implementation of next-generation cooling technologies that consume approximately one-fifth of the energy required by alternative systems.

We rely on water risk assessment methodologies to identify opportunities and adopt proactive measures to optimize water consumption. This approach is particularly relevant in areas experiencing high water stress, where allocating a higher percentage of investment becomes essential.

However, given the growing demand for emerging services such as artificial intelligence, we anticipate the development of innovative water management solutions for future expansions and new operations. These include rainwater harvesting and reuse systems, advanced purification and filtration technologies, new storage infrastructure, and efficient cooling systems. In parallel, we continue to deepen the analysis of our water footprint and associated risks, both in our direct operations and across the supply chain, as part of a comprehensive water management strategy tailored to the specific needs of each region.





GRI 3-3; 306-1; 306-2

# Waste Management, Co-processing and Circular Economy

We promote Circular Economy practices throughout our operational processes for the use, reuse, revaluation and processing of materials and waste. Our Real Estate and Health and Safety (EHS) department is responsible for the planning, implementation and recording of waste in operations in accordance with our commitments to responsible management of the life cycle of products and services.

Our waste management includes classification, segregation, removal, recovery and treatment together with specialized and authorized operators, including government entities such as local services and certified companies to ensure its proper treatment.

Among the main categories, we manage: hazardous waste, electronic waste (WEEEs), copper and fibre optic cables, batteries and oils classified as hazardous, etc.

In 2024, we strengthened our initiatives to:

- Improve the traceability of waste, electronic waste and hazardous waste together with our suppliers and authorized entities.
- Reduce single-use plastics, incentivizing reusable products.
- Promote the revaluation of discarded materials together with allied organizations.
- Develop new products from waste such as fibre optic reels, intended for schools and foundations.

In addition, we generated new alliances with non-profit organizations and educational centers, to whom we donated reusable materials, including a new donation plan for unused computer equipment in Argentina. This initiative, which originated with an exhaustive survey of the equipment of our collaborators, prioritizes the donation of multifunction printers, monochrome printers, monitors and laptops to institutions that can give them a second useful life.

During 2024, we processed 325 tons of materials and recovered functional equipment from decommissioning.







**GRI 3-3** 

# **Environmental Culture and Awareness**

In all our operations, we intend to promote a culture of care and preservation of the environment, accompanying our employees in awareness and constant training.

Annually, we reinforce our environmental culture through campaigns and team activities:

- Sustainable Mobility: we promote the use of clean means of transport, holding the first "bike-a-thon" day on World Bicycle Day in 2024.
- Training and Continuous Communication: we train our staff on critical topics such as Climate Change, Sustainable Gardens, Integrated Waste Management and Hazardous Waste Management, and we share materials of interest on water and energy saving, conservation of flora due to environmental emergencies, commemorative days, recycling and waste management and classification.
- Conservation and Biodiversity: through tree planting days and more than 10 native species in Ecuador and Colombia, we actively contribute to reforestation in our areas of operation. In addition, a group of collaborators joined the organization "Plantarse" in Argentina to participate in a voluntary meeting of coastal cleanups.



# Agents of Change: A Personal Journey into Environmental Action with Cirion

Verónica Jorba



Although I have been in this company for years, this was the first time that I participated in such a noble activity as the care of our planet. We had the opportunity to be part of the Coastal Brigade, an initiative of the organization "Plantarse" that mobilizes volunteers from various companies to carry out cleanup days on coasts and ecological reserves with watercourses. The objective is to minimize the pollution generated by the poor disposal of waste, a constant and avoidable problem.

During the day, we not only cleaned, but also received training on the importance of sorting recyclable and non-recyclable waste. This experience allowed us to understand the impact of our actions and how each collective effort contributes to the health of our ecosystems.

It was a meaningful morning, where the Cirion team demonstrated, once again, that our commitment goes beyond our daily operations. Participating in this volunteer activity was a powerful demonstration that we can be agents of positive change, adding a tangible effort to protect the environment.

# 6. OUR SOCIAL VALUE

We promote solid and sustainable alliances, with the commitment to generate a positive and lasting impact on the communities of each country and region where we are present.

#### Material Issues:

Community Relations





# Highlights 2024

#### **5 Strategic Focus Areas**

Community Relations:

- Fostering Talent and Employability
- Access to Education and Technology
- Humanitarian Support and Critical Needs
- Health and Wellness Promotion
- Environmental Preservation and Sustainability

#### More than 18 initiatives

in Latin America for the generation of value together with our communities.

#### More than USD 61,800

Our Social Investment initiatives

#### Improvements for Risk Prevention

We continue to work on improvements for the prevention of risks and reduction of potential negative impacts on the communities where we operate.

#### **CONTRIBUTION TO SDGs**





GRI 3-3; 413-1

# Community Relations

Our commitments to sustainable development and building a more equitable future extend to the communities where we operate. We aim to actively contribute in each region, promoting well-being, inclusion, and accessibility through initiatives that create social value, strengthen local ties, and respond to the specific needs of each environment.

A total of USD 61,800 was invested in initiatives aimed at strengthening community relations and promoting local development.

#### Our strategic approach to generating value in our communities:

#### Talent Promotion and Employability

We generate opportunities for job placement and contribute to the development of professional skills, especially for young people, boosting their access to the labour market and personal growth.

#### Argentina

8 members incorporated as part of the First Employment Program, together with the Push Foundation.

#### Brazil

We participate in the CIEE Young Apprentice Program, aimed at young people between 18 and 24 years old for their insertion into the labor market.

#### Colombia

Leaders from our Data Centers shared their experiences and knowledge with final-grade students from the Antonio Baraya Public School, as part of our volunteer career guidance activity.

#### Peru

We participated as sponsors in the CADE Universitario 2024, an event that brings together outstanding students from the country. Our leaders shared experiences from their careers in an intergenerational space for knowledge exchange.

#### Access to Education and Technology

We support educational institutions and organizations that promote the use of technology and connectivity as tools for learning, providing connectivity for a fair, innovative, and quality education..

#### Ecuador

We provide economic support and satellite internet services and two educational institutions, Shyri I and Eloy Alfaro.

#### Venezuela

We provide free Internet service and Hosting to the Jacinto Convit Foundation, which generates educational projects aimed at vulnerable populations.

#### Argentina

40 employees participated in the race for UNICEF education, and a fundraiser was held for the Di Tella University Scholarship program.

#### Colombia

Cirion volunteers participated in "Soy Fantástica", a space for interaction with students from Toberin School to reflect on gender issues.

### Humanitarian Support and Critical Needs

We contribute with direct assistance actions to communities and people in vulnerable situations or affected by natural disasters, covering their basic needs such as food and basic necessities.

#### Argentina

We contributed a food table by sponsoring the annual McDonalds House Foundation dinner.

#### Chile

We donated unprecedented food and basic hygiene items to families affected by the fires in 2024, along with a monetary donation for the commune of Renca.

#### Peru

We organized the "Ciriothon" to raise funds and deliver to the Association of the Beatitudes unprecedented food, diapers, bedding, toiletries and medicines for more than 500 people.

#### Health and Wellness Promotion

We collaborate with initiatives that seek to improve the health and well-being of communities, whether through support for health infrastructure, medical research or assistance programs.

#### Colombia

We donated 3 wooden reels to the San Rafael de Pacho Hospital for the elaboration of tables and chairs in the hospital garden, and recyclable materials to the Puerta de Oro Foundation that benefited children who have suffered burn injuries.

#### Peru

We donate medicines to the Association of the Beatitudes for the care of people with medical and psychological conditions.

#### Venezuela

We participate in the regional work of Telethon to support various social organizations in Latin America that fight against breast cancer.

## Environmental Preservation and Sustainability

We actively participate in and allocate funds to environmental protection projects for the promotion of sustainable practices and education on the care of nature.

#### Argentina

Different collaborators participated in the volunteer cleaning of the coasts of San Isidro with the Plantar Foundation.

#### Colombia

We organized an ecological walk to reflect on the care of the environment and planted a tree in commemoration of Arbor Day. We also contributed to the creation of a new school garden at the Liceo Mayor School in Soacha for more than 1,500 students.

#### Ecuador

We contributed with improvements in infrastructure for the school garden at the Enrique Gangotena High School.

#### Peru

Since 2009, we have been joining the annual " Aldeas Infantiles SOS" campaign by collecting cardboard and paper for recycling, an initiative that finances food for more than 2,000 children.



GRI 413-1



### A New Path: How "Cirion-Empujar" Changed my Life

Brenda Ruth Herrera



In this space, I want to share my story about the Cirion-Empujar program, which helped me land my first formal job.

Before this opportunity, my journey was marked by informal jobs since I was 16, while I tried to find my path by exploring different career options. Until one day, I came across an ad for the 'Somos Coders' bootcamp by Empujar—a program with daily classes for four hours. I thought it was an incredible opportunity and decided to give it a try.

After going through several stages, I was selected for the scholarship, and it was then that I discovered my desire to make my way into the world of technology. Once I completed the bootcamp, I continued training and participating in internships. Still, the job I needed so much—and the conditions I dreamed of—seemed far away.

Then Cirion came along, through Empujar, and opened the door for me to discover a whole new world through an initial three-month internship. For me, it meant much more than financial relief—it allowed me to experience the workplace firsthand, the empathy and support from the teams; all of that made me want to be part of Cirion. Meeting so many people and learning so many new things was a priceless experience.

Eventually, I was invited to interview for the position I now hold in Customer Success Management. I am deeply grateful to everyone at Cirion who welcomed me, guided me, shared their time and experience, and allowed me to challenge myself and keep growing.

Later, I met my current team, and the good things continue, because it's a great team—exceptional people I can always count on. No matter how big the obstacle, it can always be overcome thanks to all of them.

Today, I'm making progress, planning my future, continuing to learn, and I couldn't be more grateful.





GRI 3-3; 413-2

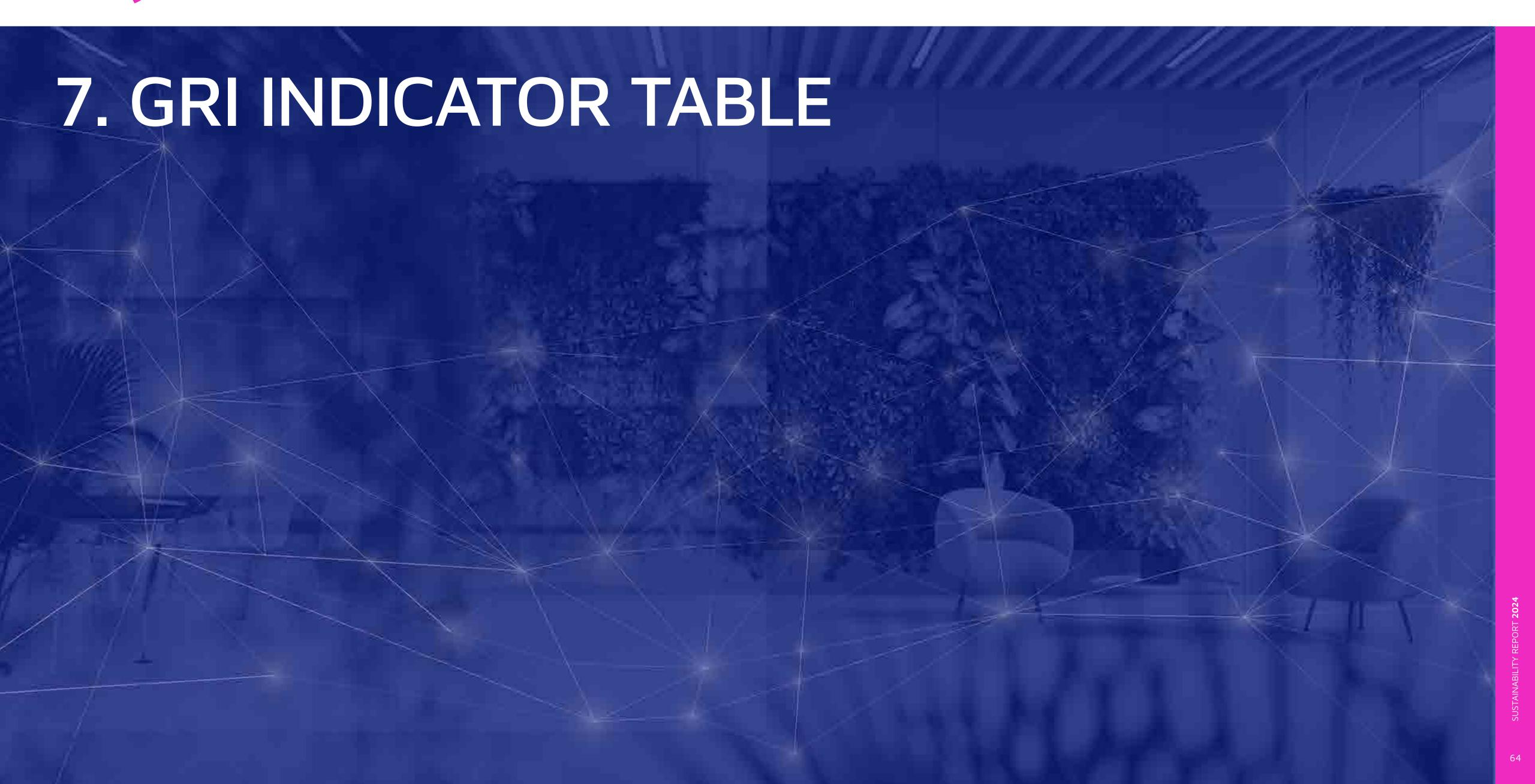
# Dialogue and Impact Management

As part of our management approach to the relationship and dialogue with our communities, we extend our Integrity Line to all neighbors so that they can formally address any concerns or suggestions regarding operations. In addition, we work on different initiatives to prevent and mitigate risks and potential negative impacts linked to the concerns of neighbors and residents about works, infrastructures or operations:

- We install soundproofing systems in electric generator rooms to prevent noise pollution in work areas.
- We carry out noise level and air quality assessments on a regular basis.
- We have licenses and approvals from local authorities to ensure that acquisitions – such as machinery and supplies – have the corresponding certifications and authorizations. For example, transmitting devices and antennas that do not exceed the maximum permitted limit of radiation according to equipment tests and evaluations of non-ionizing radiation.
- We design telemetry systems for monitoring fuel levels, enabling the implementation of instant alerts to detect leaks, seepage, or underground oil escapes; respond quickly in case of emergencies, and define corrective measures immediately.









# **GRI Indicator Table**

Statement of Use

Cirion has presented the information cited in this GRI content index for the period from January 1 to December 31, 2024 using the GRI Standards as a reference.

GRI 1 used

GRI 1: Fundamentals 2021

| GRI 2: GENERAL CONTENTS 2021                 |  |   |               |  |  |
|--|--|---|---------------|--|--|
| STANDARD AND CONTENTS                        |  | RESPONSE OR OMISSION  | CHAPTER       |  |  |
|  | 2-1 Organizational Details                                   |   | We are Cirion |  |  |
|  | 2-2 Entities included in sustainability reporting            |   | We are Cirion |  |  |
| The organization and its reporting practices | 2-3 Reporting period, frequency, and touchpoint              |   | We are Cirion |  |  |
|  | 2-4 Updating Information                                     | There are no updates of information with respect to previous Reports. |               |  |  |
|  | 2-5 External verification                                    | The Sustainability Report is not externally verified.                 |               |  |  |
|  | 2-6 Activities, value chain and other business relationships |   | We are Cirion |  |  |
| Activities and workers                       | 2-7 Employees  |   | Our Team      |  |  |
|  | 2-8 Non-Employee Workers                                     |   | Our Team      |  |  |



GOVERNANCE

**EMPLOYEES** 

ENVIRONMENT

COMMUNITY

| STANDARD AND CONTENTS |  | RESPONSE OR OMISSION   | CHAPTER                  |
|-----------------------|--|--|--------------------------|
|                       | 2-9 Governance structure and composition   |  | Our Governance Practices |
|                       | 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   |  | Our Governance Practices |
|                       | 2-12 Role of the highest governance body in supervision impact management            |  | Our Governance Practices |
|                       | 2-13 Delegation of responsibility for impact management                              |  | Our Governance Practices |
| Governance            | 2-14 Role of the highest governing body in the presentation sustainability reporting | The highest governing body reviews and approves the information presented in this Report, including material issues.                         |                          |
|                       | 2-15 Conflicts of interest   |  | Our Governance Practices |
|                       | 2-16 Communicating critical concerns   |  | Our Governance Practices |
|                       | 2-17 Collective knowledge of the highest governing body                              |  | Our Governance Practices |
|                       | 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   |  | Our Team                 |
|                       | 2-20 Process for determining remuneration  | Confidentiality soctsistions. The data are not sublished with the data are social to the social transfer.                                    |                          |
|                       | 2-21 Annual Total Compensation Ratio   | Confidentiality restrictions. The data are not publicly available due to company policies.   |                          |



GOVERNANCE

EMPLOYEES

ENVIRONMENT COMMUNITY

**GRI INDICATOR TABLE** 



| STANDARD AND CONTENTS            |  | RESPONSE OR OMISSION   | CHAPTER  |
|----------------------------------|--|--|--|
|                                  | 2-22 Declaration on the sustainable development strategy |  | We are Cirion                                    |
|                                  | 2-23 Commitments and policies                            |  | Our sustainable outlook Our Governance Practices |
|                                  | 2-24 Incorporation of commitments and policies           |  | Our Governance Practices                         |
| Strategy, policies and practices | 2-25 Processes to remediate negative impacts             |  | Our Governance Practices                         |
|                                  | 2-26 Mechanisms for seeking advice and raising concerns  |  | Our Governance Practices                         |
|                                  | 2-27 Compliance with legislation and regulations         | In 2024, there were no violations of our Human Rights policy by suppliers, nor environmental claims. | Our Governance Practices                         |
|                                  | 2-28 Membership of associations                          |  | Our Governance Practices                         |
| Stakeholder participation        | 2-29 Stakeholder engagement approach                     |  | Our sustainable outlook                          |
|                                  | 2-30 Collective bargaining agreements                    |  |  |



GOVERNANCE

EMPLOYEES

ENVIRONMENT



| GRI 3: MATERIAL TOPICS             |  |   |   |  |
|------------------------------------|--|---|---|--|
| STANDARD AND CONTENTS              |  | RESPONSE OR OMISSION  | CHAPTER   |  |
|                                    | 3-1 Process of determining material topics   |   | Our sustainable outlook   |  |
| Material Topics 2021               | 3-2 List of material topics  |   | Our sustainable outlook   |  |
|                                    | 3-3 Management of material topics  |   | Our Governance Practices Our Team Our Environmental Approach Our Social value |  |
| GRI 201: Economic Performance 2016 | 201-2 Financial implications and other risks and opportunities arising from climate change |   | Our Environmental Approach  |  |
|                                    | 205-1 Operations assessed for corruption-related risks                                     |   | Our Governance Practices  |  |
| GRI 205: Anti-Corruption 2016      | 205-2 Communication and training on anti-corruption policies and procedures                |   | Our Governance Practices  |  |
|                                    | 205-3 Confirmed corruption cases and measures taken  | In 2024, no cases of corruption, incidents or judicial cases were identified. | Our Governance Practices  |  |
| GRI 302: Energy 2016               | 302-1 Energy consumption within the organization   |   | Our Environmental Approach  |  |
| diti 302. Elicity 2010             | 302-4 Reduction in energy consumption  |   | Our Environmental Approach  |  |
|                                    | 305-1 Direct GHG emissions (scope 1)   |   | Our Environmental Approach  |  |
|                                    | 305-2 Indirect GHG emissions from power generation (scope 2)                               |   | Our Environmental Approach  |  |
| GRI 305: Emissions 2016            | 305-3 Other indirect GHG emissions (scope 3)   |   | Our Environmental Approach  |  |
|                                    | 305-4 GHG emissions intensity  |   | Our Environmental Approach  |  |
|                                    | 305-5 Reduction GHG emissions  |   | Our Environmental Approach  |  |



GOVERNANCE

EMPLOYEES

ENVIRONMENT

COMMUNITY



| STANDARD AND CONTENTS                        |  | RESPONSE OR OMISSION  | CHAPTER                    |
|--|--|---|----------------------------|
|  | 306-1 Waste generation and significant impacts related to waste  |   | Our Environmental Approach |
|  | 306-2 Managing Significant Waste-Related Impacts   |   | Our Environmental Approach |
| GRI 306: Waste 2020                          | 306-3 Waste generated  |   | Our Environmental Approach |
|  | 306-4 Waste diverted from disposal   |   | Our Environmental Approach |
|  | 306-5 Waste directed to disposal   |   | Our Environmental Approach |
|  | 401-1 New employee hires and employee turnover   |   | Our Team                   |
| GRI 401: Employment 2016                     | 401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees |   | Our Team                   |
|  | 401-3 Parental leave   | Total number of employees who have been entitled to parental leave in 2024: 100%<br>Total number of employees who have taken parental leave in 2024: 7 men and 10 women | Our Team                   |
|  | 403-1 Occupational health and safety management system   |   | Our Team                   |
|  | 403-2 Hazard identification, risk assessment, and incident investigation                                 |   | Our Team                   |
|  | 403-3 Occupational health services   |   | Our Team                   |
|  | 403-4 Worker participation, consultation, and communication on occupational health and safety            |   | Our Team                   |
| GRI 403: Occupational health and safety 2018 | 403-5 Worker training on occupational health and safety  |   | Our Team                   |
|  | 403-6 Promotion of worker health   |   | Our Team                   |
|  | 403-8 Workers covered by an occupational health and safety management system                             | 100% of employees covered by the Management System.   | Our Team                   |
|  | 403-9 Work-related injuries  | In 2024, no serious injuries, fatalities, or occupational diseases were reported. Injury Rate: 0 (zero)   | Our Team                   |
|  | 403-10 Work-related ill health   | 0 (2010)  | Our Team                   |



GOVERNANCE

EMPLOYEES

ENVIRONMENT



| STANDARD AND CONTENTS                           |   | RESPONSE OR OMISSION  | CHAPTER                  |
|---|---|---|--------------------------|
|   | 404-1 Average hours of training per year per employee   |   | Our team                 |
| GRI 404: Training and Education 2016            | 404-2 Programs for upgrading employee skills and transition assistance                              |   | Our team                 |
|   | 404-3 Percentage of employees receiving regular performance and career development reviews          |   | Our team                 |
| GRI 405: Diversity and Equal Opportunities 2016 | 405-1 Diversity of governance bodies and employees  |   | Our Team                 |
| GRI 413: Local Communities 2016                 | 413-1 Operations with local community engagement, impact assessments, and development programs      |   | Our Social Value         |
|   | 413-2 Operations with significant actual and potential negative impacts on local communities        |   | Our Social Value         |
| GRI 418: Customer Privacy 2016                  | 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data. | During 2024, no security incidents or data breaches compromising confidential information or personal data were reported. | Our Governance Practices |