

ENVIRONMENTAL POLICY

PURPOSE

This Environmental Policy of R&G TELECOMM GROUP reaffirms the commitment to environmental protection and the proper management of the expectations of its stakeholders in this matter, following the strategic guidelines defined in the Sustainability Policy and the Code of Conduct of R&T TELECOMM GROUP.

Specifically, R&G TELECOMM GROUP positions itself as a company that provides engineering services for infrastructures in the telecommunications industry, with a clear and defined mission:

To pursue leadership in America, optimizing the profitability of the resources employed and promoting sustainable development, both economically and socially, in the countries where it is present.

R&G TELECOMM GROUP's commitment to improving society focuses on four areas of action:

Respect for ethics, integrity, and professionalism in the Group's relationship with its stakeholders.

Respect for the economic, social, and environmental environment.

Promotion of innovation and research in its application to infrastructure development.

Creation of employment and welfare as an economic driver for society.

Therefore, this Policy is aligned with the mission and principles of integrity and respect for the Group's Standards, taking into consideration not only the interests of R&G TELECOMM GROUP but also the demands that may come from other stakeholders with whom it relates.

SCOPE OF APPLICATION

2.1. TERRITORIAL

This Policy applies globally.

2.2. SUBJECTIVE

This Environmental Policy is applicable, where appropriate, to the partners of R&G TELECOMM GROUP, including contracted companies acting on behalf of the company, provided that R&G TELECOMM GROUP assumes operational control. Additionally, R&G TELECOMM GROUP will apply the principles of this Policy to its new projects.

The Management Team of R&G TELECOMM GROUP will make every effort to enforce the commitments contained in this Policy, ensure that it is made public and disseminated internally and externally, and ensure that it is reflected in the necessary operational policies and procedures to instill the assumed commitments throughout the company.

FRAMEWORK REGULATIONS (REFERENCE STANDARDS)

This Policy must be interpreted in the context of the following R&G TELECOMM GROUP Standards:

R&G TELECOMM GROUP Code of Conduct

R&G TELECOMM GROUP Business Suppliers Code of Conduct

EXTERNAL SOURCES

R&G TELECOMM GROUP continuously monitors environmental developments that may be relevant to the company so that internal frameworks of action remain updated and based on an analysis of the latest international agreements and recognized standards for integration when they are relevant and feasible for the company.

Thus, R&G TELECOMM GROUP's environmental performance and the principles of this policy are aligned and inspired by best practices and sources, such as:

Resolutions and agreements on Climate Change, such as the Paris Agreement reached at the 21st Conference of the Parties (COP21) and updated at the 26th Conference of the Parties (COP26), which establishes a global action plan to limit global warming below 1.5°C.

Regulation of the European Parliament and Council to achieve climate neutrality ("European Climate Law")

Sustainable Development Goals (SDGs), adopted in 2015, marking the 2030 Agenda for taking measures to end poverty, protect the planet, and ensure that all people enjoy peace and prosperity.

United Nations Global Compact, which embodies the corporate commitment to ten principles related to human rights, labor, environment, and anti-corruption.

Elements of environmental strategy, management, and performance evaluated by initiatives driven by the investment community, such as Carbon Disclosure Project (CDP).

UN Human Rights Council Resolution 48/13 on the human right to a safe, clean, healthy, and sustainable environment.

DEFINITIONS

For the purposes of this Policy, the following terms shall be interpreted in accordance with the definitions provided below.

Standards: Documents that R&G TELECOMM GROUP establishes to provide instructions to individuals associated with the Group, both under labor and commercial regimes. They are divided into Policies, Regulations, and Procedures, and can have a Global or Local scope.

Policy: Refers to this Environmental Policy.

Business partners: any legal or natural person with whom the Organization maintains or plans to establish some form of business relationship. This includes intermediaries, individuals, or legal entities hired by R&G TELECOMM GROUP for the delivery of goods or provision of services.

CONTENT OF THE ENVIRONMENTAL POLICY

R&G TELECOMM GROUP aligns its business objectives with environmental protection and proper management of the expectations of its stakeholders in this matter.

This Environmental Policy of R&G TELECOMM GROUP defines the general principles to follow, as well as other commitments made by the companies regarding other environmental regulations, such as Carbon Footprint or Water Footprint.

Within this Policy, the following commitments are established:

Compliance with applicable legislation and regulations in general, as well as other voluntary commitments in each of its Projects, Works, and Services developed by R&G TELECOMM GROUP.

Pollution prevention by assessing potential environmental risks in each phase of the project, work, or service, aiming to design processes that minimize environmental impact whenever possible.

Continuous improvement in environmental performance management through the establishment and monitoring of environmental objectives.

Transparency in external communication through regular publication of information on environmental performance to all stakeholders, addressing their demands and expectations, whether by regulatory compliance or voluntarily.

Training and awareness through educational and awareness activities for employees, suppliers, customers, and other stakeholders.

Activities such as construction and service provision, which are part of R&G TELECOMM GROUP, involve direct interaction with the environment. In this regard, the main environmental impacts resulting from these activities are related to resource consumption (including material, energy, and water consumption), waste generation, and the potential impact of projects on the natural environment and biodiversity.

To articulate and implement a policy on these environmental commitments, identification and assessment of the most significant environmental impacts are carried out. For each of these priorities, key objectives and indicators are established to monitor environmental performance, as well as improvement programs and action plans for individual companies or groups of companies.

Main Areas of Action

Considering the identified environmental impacts, R&G TELECOMM GROUP's main environmental measures will focus specifically and operationally on four areas of action. Furthermore, these measures will be taken into consideration for adapting or creating specific policies for each business.

Energy and Emissions

Climate change necessitates changing production and consumption models to mitigate physical and transitional risks. This requires the involvement of states and companies working together in harmony. Controlling local pollution is particularly relevant to ensure the well-being of communities where the Group operates.

For this, R&G TELECOMM GROUP commits to minimizing emissions beyond greenhouse gas emissions, considering other pollutants (NO_x, SO_x, substances affecting the ozone layer), noise emissions, and other possible disturbances resulting from its activities, such as light pollution.

In this field, R&G TELECOMM GROUP's activities will be governed by the following basic principles:

Consider and evaluate the impacts of its activities, products, and services on climate change.

Avoid or minimize energy consumption and greenhouse gas emissions generated by its activities.

Set greenhouse gas emissions reduction targets aligned with the latest trends and standards.

Avoid or minimize pollution generated by its activities, including emissions to the atmosphere, noise and vibrations, or light pollution.

Establish mechanisms for managing energy use and emissions, allowing for objective measurement of performance and decision-making.

Identify opportunities to promote environmentally-friendly products and services, adapted to potential climate change impacts, contributing to the transition to a low-carbon economy.

Circular Economy

The circular economy responds to the global trend of creating value with fewer resources. R&G TELECOMM GROUP aims to contribute to the implementation of a new non-linear economy, based on the Life Cycle Analysis (LCA) principle of products, services, waste, materials, water, and energy. It will consider both well-established solutions such as eco-design, waste prevention, management, and recycling, as well as new solutions as they develop.

Consider and evaluate the main impacts regarding the use of materials and waste management, considering the life cycle of projects and services.

Prioritize operational models that reduce resource consumption and waste generation in terms of quantity and hazardousness.

Contribute to extending the usefulness of resources, by repairing, reusing, and recycling secondary products and waste.

Identify business opportunities to contribute to the circular economy through activities and services.

Efficient and Responsible Water Resource Management

R&G TELECOMM GROUP acknowledges the importance of responsible water management in its operations. The Group commits to reducing water consumption and minimizing its environmental impact on water resources in its projects and services.

Biodiversity

The Group's business development inevitably interacts with ecosystems that may alter their initial value. Therefore, R&G TELECOMM GROUP aims to strike a balance between development and biodiversity conservation and natural capital, with a commitment to non-deforestation. The Group will focus on the protection of areas with ecological, landscape, scientific, or cultural interest.

Consider the initial value of ecosystems that may be significantly affected by activities and services.

Assess the impact of activities, products, and services on ecosystems, as well as their impact throughout the supply chain, including direct and indirect suppliers if the contracted activity is critical for biodiversity.

Prevent deforestation resulting from its activities and those of direct and indirect suppliers, through compensation, restoration, reforestation, and the promotion of the use of certified and recycled wood.

R&G TELECOMM GROUP has proven measures to ensure the conservation of flora and fauna throughout the planning and execution of its operations. These measures are based on:

Physical protection, transplantation, or relocation, respecting the life cycles of affected plant and animal species.

Environmental impact studies, identifying the main effects on the natural environment of the projects and establishing actions to minimize them. Public participation in the approval procedures for these projects is guaranteed by the national and regional legislation of each country where they are developed.

Monitoring plans, ensuring compliance not only with mandatory regulations and standards on biodiversity and forest conservation but also with preventive measures to reduce the impact of projects and processes not subject to environmental impact assessments.

Elements for Policy Application and Monitoring

The responsibility for supervising R&G TELECOMM GROUP's environmental performance and carrying out action plans and improvement programs lies with the Ethics and CSR Committee. The Committee will take necessary measures to reduce and mitigate environmental impacts related to the Group's activities.

This Environmental Policy of the Group is available on the company's website and will be communicated to all personnel working on behalf of and for the organization.

R&G TELECOMM GROUP will promote the establishment of mechanisms and procedures among Group companies to promote compliance with the principles of this Policy, including:

Conducting all ACS Group activities in accordance with the relevant legislation.

Pursuing continuous improvement in environmental matters by implementing an environmental management system that ensures compliance with policies, sets and monitors objectives in this area, allowing for objective measurement of performance, and serves as the basis for decision-making.

Monitoring the environmental impact throughout R&G TELECOMM GROUP's value chain.

Encouraging and incentivizing suppliers, contractors, and collaborating companies to have their own policy. In cases where they don't have their own policy, they should adopt R&G TELECOMM GROUP's Environmental Policy and extend good sustainability practices and environmental care throughout their supply chain.

Promoting the implementation of non-financial criteria, including environmental criteria, in the approval of suppliers and the evaluation and establishment of mechanisms to detect bad practices in this area.

Considering, in the procurement processes with third parties, evaluation criteria that take into account environmental performance, as well as the implementation of contractual clauses where necessary.

Enhancing employee training and awareness in environmental aspects through specific programs, both in-person and distance learning, as a method to raise awareness and instill the principles established in this Policy.

Promote actions aimed at raising awareness among customers and society in general regarding the aspects covered in this Policy.

Foster participation or partnership with reputable external organizations that promote compliance with the principles of this Policy.

Regarding corporate operations, their impact will be analyzed according to the principles established in this Policy.

To ensure that the commitments made in this Policy govern activity throughout its global value chain, R&G commits to following the procedures defined in its Ethics Committee

Protocol, particularly in relation to Environmental matters. Through the Ethics Committee Protocol, continuous measures and processes based on criteria of proportionality and probability are implemented to identify, prevent, and mitigate real and potential adverse environmental impacts throughout the activity and global value chain. In cases where necessary, effective remediation is provided in collaboration with legitimate authorities. These procedures and their results are monitored and reviewed periodically to ensure their proper functioning and results, and affected stakeholders are included in the review and continuous adaptation of the procedures.

The various companies within the ACS Group will be responsible for conducting due diligence processes in their activities following the guidelines established in the Protocol.

REVIEW OF THE ENVIRONMENTAL POLICY

According to the provisions of the Ethics Committee Regulations, it will be responsible for overseeing compliance with corporate governance rules, internal codes of conduct, and the Sustainability Policy.

For the monitoring of the Environmental Policy's strategy and practices, R&G TELECOMM GROUP has an internal evaluation system that aims to promote good management practices among the Group's companies.

EXCEPTIONS TO THE STANDARD

This Standard does not foresee exceptions to its application. However, if a department requests an exception to the application of this Standard, written authorization must be obtained from the Ethics Committee, providing justifiable reasons for the request.

NON-COMPLIANCE WITH STANDARDS

Non-compliance with this Standard must be reported through various channels, including the corresponding hierarchical superior or directly through the company's Ethics Channel. R&G TELECOMM GROUP will apply corrective and preventive actions necessary to address detected environmental non-compliance and, if necessary, will apply appropriate sanctions

to individuals or companies involved in the non-compliance, according to the severity of the breaches.

APPROVAL, EFFECTIVE DATE, AND DURATION

This Standard will be applicable after its approval by the Ethics Committee on the indicated date at the beginning and will be mandatory in its objective and subjective scope from that moment on.

ADDITIONAL CONSIDERATIONS

Although this Standard may be translated into different languages, the authentic version for interpretative purposes shall be the one drafted in English.

JUNE 30, 2023

