

Environmental and Social Review Summary (“ESRS”)

Banco Actinver - MSME Financing in Mexico / 15727-01

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- 1. Scope of Environmental and Social Review.** The Environmental and Social (“E&S”) assessment was conducted during the second quarter of 2026 through a review of relevant documentation and meetings with management representatives from various areas. The materials reviewed fall within the E&S risk assessment, as well as human resources management policies and procedures. BANCO ACTINVER, S.A., INSTITUCIÓN DE BANCA MÚLTIPLE, GRUPO FINANCIERO ACTINVER (“Actinver” or the “Bank”) is a new client of BID Invest.
- 2. Environmental and Social Categorization and Rationale.** The proposed transaction is classified as IF-2 in accordance with BID Invest’s Environmental and Social Sustainability Policy, given that the Bank’s current or future portfolio, within the scope of BID Invest financing, namely the asset class, consists or is expected to consist primarily of business activities with limited adverse environmental or social risks or impacts, few in number, generally site-specific, largely reversible, and manageable through mitigation measures. It may also include a very limited number of activities with adverse risks or impacts that are diverse, irreversible, or unprecedented.

The Performance Standards (“PS”) applicable to the transaction are: (i) PS 1: Assessment and Management of Environmental and Social Risks and Impacts; and (ii) PS 2: Labor and Working Conditions. BID Invest resources may not be used by the Bank to finance Category A (high-risk) subprojects, as defined by BID Invest, nor activities included in the BID Invest Exclusion List.

The transaction primarily consists of financing targeted green portfolio subprojects, as well as micro, small and medium-sized enterprises (“MSME”), to a lesser extent. In the case of the green portfolio, eligible subprojects¹ may belong to both the SME and corporate segments, and such portfolio is expected to be composed mainly of Green Buildings category subprojects and companies holding green certifications.

The average loan amount and tenor in the SME portfolio are approximately US\$1.7 million (equivalent to MXN29.1 million at the prevailing exchange rate) and 46 months respectively.

The Bank defines MSMEs as companies with annual revenues of up to approximately US\$14.5 million (equivalent to MXN250 million at the prevailing exchange rate).

The transaction is considered aligned with the provisions of the Paris Agreement based on the analysis in accordance with IDB Group’s Paris Alignment Implementation Approach.

- 3. Environmental and Social Risks and Impacts.** The main E&S risks relate to Actinver’s capacity to identify and manage the E&S risks associated within its lending activities in the relevant asset class, particularly the green portfolio. Potential risks include occupational health and safety, waste generation, labor rights, handling of hazardous materials, land use change, community safety, and other sector-specific risks.

The E&S impacts and risks associated with sub-projects are expected to be moderate and will be managed through the Bank’s existing procedures, strengthened by the measures outlined in Section 5 of this report.

¹ Eligible subprojects under the Renewable Energy category will include, among others, hydropower plants with an installed capacity of up to 5MW, as well as wind and solar energy projects with an installed capacity of up to 10MW.

4. Mitigation Measures. Actinver initiated the development of its Environmental and Social Management System (“ESMS”) in 2025, with the support of an external consultant specialized in E&S risk management, with the objective of strengthening the identification, assessment, and management of E&S risks and impacts, including physical climate risk, associated with its financing activities. The Bank expects to begin implementation of the ESMS during the first half of 2026. The Bank currently has an Environmental and Social Risk Manager, responsible for coordinating and overseeing the development and implementation of the ESMS, as well as for integrating E&S criteria into the financing processes. Once implemented, the ESMS will enable the systematic management of E&S risks related to the financed asset class and will include, among other components: (i) an Environmental and Social Policy; (ii) an Exclusion List aligned with the BID Invest Exclusion List; (iii) procedures and tools for the identification, categorization, and assessment of E&S risks at the subproject level, based on applicable E&S regulations and, where relevant, the IFC Performance Standards (“PS”); and (iv) guidelines for the definition, implementation, and monitoring of E&S action plans. In addition, the ESMS will incorporate monitoring and reporting mechanisms for the E&S performance of the financed subprojects. As part of the transaction’s E&S Action Plan, the Bank plans to integrate and/or strengthen existing procedures and tools related to environmental and social management, including, where applicable, external grievance mechanisms, relevant corporate policies of the economic group, and other internal instruments linked to sustainability and regulatory compliance.

In addition, the Bank has internal Human Resources policies that incorporate principles of equal opportunity and non-discrimination, as well as an internal grievance mechanism for employees.

The Bank shall ensure that all subprojects financed with proceeds from the transaction comply with the BID Invest Exclusion List, applicable local E&S legislation, and BID Invest’s Environmental and Social Sustainability Policy, including the IFC Performance Standards, as applicable.

As part of capacity strengthening, the Environmental and Social Risk Manager will be required to complete the online course or complete the online “ESMS in practice²” course. in accordance with the applicable requirements for transactions categorized as IF-2.

In the event that the IFC Performance Standards are triggered, the Bank will implement an External Communication Mechanism to address public inquiries or grievances related to the E&S risks and impacts of the financed subprojects.

² Environmental and Social Management: ESMS in Practice <https://cursos.iadb.org/en/indes/environmental-social-risk-management-esms-practice> (next edition available June 2026)

5. Environmental and Social Action Plan (“ESAP”):

Item #	Action	Deliverable	Deliverable Date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts			
E&S Assessment and Management System			
1	1.1 Establish the application of the IFC PS to loans to subprojects with a total amount of US\$≥5 million and a tenor of ≥36 months.	Updated ESMS	3 months after issuance or first disbursement
	1.2 Submit the first three Environmental and Social Due Diligence Reports (“ESDD”) corresponding to transactions in which the IFC Performance Standards are applied, in order to: (i) confirm the E&S categorization; and (ii) review the proposed action plan.	ESDD for the first three transactions to which the PS are applied	As each report becomes available
External communication			
2	Develop and implement a procedure for the receipt, review, logging, and response, as applicable, to public opinions, concerns, and information requests related to E&S matters.	i) Approved procedure ii) Evidence of implementation	i) Within six (6) months after the first disbursement ii) As part of the ESMR ³
Management programs			
3	Develop and implement, for eligible solar photovoltaic energy subprojects, the following: a) a Supplier Code of Conduct; and b) a procedure for the management of labor risks in the solar panel supply chain.	i) a) Approved Code; and b) Approved Procedure ii) Evidence of implementation of (a) and (b)	i) Within three (3) months after the first disbursement ii) As part of the ESMR
Organizational capacity and competency			
4	The Bank’s E&S Manager shall complete the online course on environmental and social risk management offered by IDB Invest.	Course completion certificate	i) Within six (6) months after the first disbursement ii) As part of the ESMR, each time new personnel are incorporated into the E&S team.

6. Contact Information For project inquiries, including environmental and social questions related to an IDB Invest transaction please contact the client (see **Investment Summary** tab), or IDB Invest using the email divulgacionpublica@iadb.org. As a last resort, affected communities have access to the IDB Invest Independent Consultation and Investigation Mechanism by writing to mecanismo@iadb.org or MICI@iadb.org, or calling +1(202) 623-3952.

³ ESMR means E&S Monitoring Report, which shall be regularly submitted to IDB Invest.