

Environmental and Social Review Summary (ESRS) Samsung Trusted Technology LAC Facility – REGIONAL

Original language of the document: Spanish
Date of issuance: August, 2026

1. General operation information

This transaction (the "Operation" or the "Transaction") consists of a multi-product regional financing facility for Garona Development, S.A. and eligible affiliated entities of the Sistemas Logísticos y Corporativos group (the "Client," the "Enterprise," the "Company," or "Samsung"), an integrated regional platform specializing in the commercialization, financing, logistics, and authorized distribution of Samsung technology in Central America and other markets in Latin America and the Caribbean.

The Operation will support working capital needs, accounts receivable monetization, and liquidity management through an indicative structure that includes: i) the purchase of accounts receivable without recourse for large corporate debtors; ii) accounts receivable financing with limited recourse for small and medium-sized enterprises ("SMEs") and vulnerable segments; and iii) a revolving on-balance-sheet working capital line. The Company operates in Guatemala, El Salvador, Honduras, Costa Rica, Panama, and the United States, importing, storing, commercializing, and distributing mobile phones, accessories, electronic equipment, white goods, and digital products related to telecommunications operators, retailers, wholesalers, and corporate clients.

2. Scope of IDB Invest's environmental and social review

The environmental and social analysis of the Operation consisted of a documentary review of the Company's performance in the areas of ethics, environment, social, labor, occupational health and safety ("OHS"), human rights, supply chain, compliance, and the applicable corporate frameworks of Samsung Electronics ("SE") along the value chain. The review considered, among other documents: i) due diligence information provided by Sistemas Logísticos y Corporativos ("SLC"); ii) the SLC Trade Code of Conduct; iii) the Regional Occupational Health and Safety Policy for visitors and suppliers; iv) SE's Global Human Rights Principles; and v) SE's 2026 Sustainability Report.

The review focused on compliance with the following Performance Standards ("PS"): PS1: Assessment and Management of Environmental and Social Risks and Impacts; PS2: Labor and Working Conditions; PS3: Resource Efficiency and Pollution Prevention; and PS4: Community Health and Safety.

3. Environmental and social categorization and its justification

In accordance with IDB Invest's Environmental and Social Sustainability Policy, the Operation has been classified under Category C, given that the expected incremental environmental and social impacts are low and practically negligible. The Transaction corresponds to a financial facility for working capital and

the purchase or financing of accounts receivable associated with the commercialization and distribution of technology products. It does not contemplate the construction or expansion of infrastructure, land acquisition, physical or economic displacement of the population, or activities with significant direct negative impacts on communities, biodiversity, indigenous peoples, or cultural heritage.

Based on the preliminary analysis conducted in accordance with the IDB Group's Paris Alignment Implementation Approach, the Operation is considered aligned with the Paris Agreement. Furthermore, the Transaction does not involve investments in carbon-intensive assets or excluded activities, as it solely supports a regional supply chain of digital and electronic products, with environmental and social risks manageable through SLC's and SE's corporate systems.

4. Environmental and social risks

4.1 Assessment and management of environmental and social risks and impacts

The Client has a formal environmental and social governance structure, in which its Board of Directors and Sustainability Committee oversee the strategy, risks, and performance in environmental, social, and governance matters. At the managerial level, the company operates internal bodies such as the *Sustainability Council* of the Device *eXperience* ("DX")¹ Division and the *Environmental, Social and Governance* ("ESG") *Management Council* of the Device *Solutions* ("DS")² Division, responsible for coordinating the implementation and monitoring of key sustainability matters. This governance model includes, among others, specialized committees or bodies focused on supply chain, privacy, information security, product quality, artificial intelligence, compliance, and ethics.

The Company conducts materiality and double³ materiality assessments to identify environmental and social impacts, risks, and opportunities throughout its value chain.⁴ Its 2026 Sustainability Report identifies, as material topics, climate change, energy, water, resource and waste circularity, labor conditions, supply chain, information protection and security, compliance, and ethics.

At the Operation level, the Company applies brand and compliance guidelines associated with its role as an authorized distributor and official Samsung retail operator, as well as applicable local legislation on labor, OHS, ethics, permitting, and operational controls. Samsung conducts risk-proportionate due diligence on its suppliers, contractors, corporate clients, and relevant transactions, including legal, labor, reputational, anti-corruption, sanctions, and security compliance verifications.

The Company has a Code of Conduct that defines principles of integrity, respect, responsibility, and commitment; establishes guidelines on human rights, work environment, harassment, discrimination, health and safety, anti-corruption, and conflicts of interest, among others; and provides for reporting

¹ DX is the division focused on finished products for consumers and businesses, such as mobile phones, TVs, monitors, home appliances, medical equipment, connected devices, and consumer digital products.

² DS is the division focused on components and semiconductors, such as memories, chips, processors, and other electronic components that are subsequently used in technology products.

³ The materiality assessment is a critical process that helps companies identify and prioritize sustainability issues that are most relevant to them and to their stakeholders, including customers, suppliers, investors, local communities, and others. Double materiality is a sustainability assessment approach that considers two complementary perspectives when determining which ESG issues are material or relevant to a company.

⁴ <https://www.samsung.com/global/sustainability/digital-library/sustainability-report/>

through an ethics hotline. Likewise, SLC has a Regional OHS Policy for visitors, suppliers, and contractors, applicable in Guatemala, El Salvador, Honduras, Nicaragua, and Costa Rica, which establishes responsibilities, personal protective equipment requirements, safe work permits, incident reporting, waste control, and sanctions for non-compliance.

The Client maintains grievance and reporting channels, including an Ethics ⁵Hotline, available to employees, contractors, suppliers, and clients, under principles of confidentiality, non-retaliation, investigation, and remediation. In the event of non-compliance identified in suppliers or contractors, the Company creates corrective action plans with responsible parties, deadlines, and closing evidence, and serious cases may result in the suspension or termination of the business relationship.

4.2 Labor and working conditions

Samsung applies the Global Human Rights Principles, which formalize its commitment to human rights and international labor standards, including the International Bill of Human Rights, the International Labour ⁶Organization ("ILO") Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights,⁷ the OECD Guidelines for Multinational Enterprises, and the *Responsible Business Alliance* ("RBA") Code of Conduct. ⁸These principles apply globally to Samsung, its entities, permanent and contingent employees, products and services, as well as to business relationships, including supply chain, contractors, subcontractors, partners, resellers, clients, end users, and communities.

Samsung identifies as relevant labor and human rights risks, among others, working hours, adequate living conditions, prevention of forced and child labor, freedom of association and collective bargaining, OHS, non-discrimination, harassment, product responsibility, privacy, environmental responsibility, and responsible mineral sourcing. The Company carries out human rights due diligence processes through risk assessments, third-party audits, self-assessments, worker interviews, specific assessments for vulnerable groups, and monitoring of corrective actions.

The Company maintains an annual human rights training process for its employees, which in 2025 was completed by 97.5% of its employees. Likewise, its Global Grievance Resolution Policy was able to resolve 99.8% of the 16,460 cases received in 2025.

The Client, for its part, has a Code of Conduct applicable to its employees, which: i) includes commitments to respect human rights; ii) rejects harassment, violence, intimidation, and discrimination; iii) requires compliance with labor laws; iv) promotes a respectful work environment with equal opportunities; and v) contains minimum OHS requirements to be observed. It also has specific health and safety procedures, including guidelines for breathalyzer testing in Guatemala, El Salvador, Honduras, and Costa Rica, aimed at preventing accidents and protecting the integrity of personnel and operations.

⁵[Reporting Wrongful Practices](#)

⁶In the business context, it means that the company recognizes fundamental rights such as equality, non-discrimination, freedom, security, fair working conditions, health, education, privacy, and access to remedy.

⁷The OECD is the Organisation for Economic Co-operation and Development, an international body that coordinates economic and social policies among its member countries to improve quality of life and foster global development.

⁸The RBA establishes standards to ensure that working conditions in the electronics sector or in sectors where electronics is a key component, as well as in their supply chains, are safe, that workers are treated with dignity and respect, and that the company's operations are environmentally responsible and conducted ethically.

4.3 Resource use efficiency and pollution prevention

No significant direct impacts on resource use, generation of emissions, discharges, or waste are expected. The direct environmental risks associated with the Transaction are limited and relate primarily to commercial activities, storage, logistics, points of sale, technical service, and handling of electronic products, including potential risks of electronic waste, packaging, energy consumption, health and safety in warehouses and stores, and compliance with local environmental permits and requirements.

At the corporate level, Samsung has an environmental strategy that includes targets for: i) net zero Scope 1 and 2 emissions for the DX and DC divisions by 2030 and 2050, respectively; and ii) transition to renewable energy, product energy efficiency, circular economy, water management, waste reduction, and pollution prevention.

The DX Division achieved in 2025: i) a renewable energy transition of 94.8%; ii) reduced the average energy consumption of seven main product categories by 34.4% compared to equivalent 2019 models; iii) achieved a recycled plastic application rate of 33.7% in plastic parts of products; and iv) recovered 7.54 million tons of electronic waste since 2009. The Company also uses environmental management systems, climate risk assessment, product life cycle analysis, electronic waste recovery programs, zero-waste-to-landfill certifications, and controls on hazardous substances in products and processes, including compliance with regulations such as Restriction of Hazardous Substances ⁹("RoHS"), Registration, Evaluation, Authorization and Restriction of Chemicals ("REACH"), ¹⁰and the Toxic Substances Control Act ("TSCA").¹¹

The Client also manages environmental risks in its supply chain through: i) environmental compliance requirements; ii) Environment, Health and Safety ("EHS") audits; iii) Eco-Partner certification; iv) ¹²controls on substances of concern; v) management of greenhouse gas emissions from suppliers; vi) carbon reduction programs; vii) responsible mineral sourcing; and viii) first- and second-tier supplier audits. The regional health and safety policy for visitors and suppliers includes provisions on proper disposal of waste generated by contractors and compliance with applicable environmental and safety regulations.

4.4 Community health and safety

The Project does not contemplate the development of new products or the construction or expansion of facilities or the carrying out of activities that generate new impacts on communities. Therefore, no material adverse impacts on community health, safety, and security are expected. Potential risks are limited to the ordinary risks associated with commercial activities, distribution, transportation, storage, customer service, consumer protection, information privacy and security, and safe use of electronic products.

Samsung has corporate structures for privacy, information security, product quality and safety, including privacy principles based on transparency, security, and choice, as well as cybersecurity pillars oriented toward prevention, prediction, detection, and response.

⁹ European Union regulation that restricts the use of certain hazardous substances in electrical and electronic equipment, such as lead, mercury, cadmium, and certain flame retardants.

¹⁰ European Union regulation that requires the registration, evaluation, and control of chemical substances to protect human health and the environment.

¹¹ United States law that regulates the manufacture, import, use, and disposal of potentially toxic chemical substances.

¹² The Eco-Partner certification is a Samsung system for evaluating and approving suppliers from an environmental standpoint, particularly in relation to the control of hazardous or restricted substances in parts, components, and raw materials.

The company operates a legal privacy management system, channels for receiving and processing security vulnerability reports, the Samsung Knox ¹³platform, and security updates for mobile devices for up to seven years. It also has a Quality Innovation Committee and product quality and safety assurance systems throughout the life cycle, including safety, compatibility, usability, technical service, and customer complaint response assessments.

SLC, as an authorized distributor, manages operational and health and safety risks through controls in stores, warehouses, and distribution centers, fire permits, fire extinguishers, per-store insurance, contractor supervision, incident reporting, and corrective measures.

4.5 Land acquisition and involuntary resettlement

The Operation does not involve land acquisition, land use restrictions, or physical or economic displacement of population.

4.6 Biodiversity conservation and sustainable management of living natural resources

The Operation will not generate new direct impacts on biodiversity or living natural resources. However, as in comparable operations in the technology sector, these impacts and risks are associated with the electronic products supply chain, particularly the sourcing of minerals, metals, components, and materials used in electronic equipment.

To manage them, the Client has been implementing supplier due diligence processes, and establishing environmental requirements, controls on substances and materials, and responsible mineral management procedures, and participating in certain forums such as the Responsible ¹⁴Minerals Initiative ("RMI"). The Company maintains a responsible minerals management system based on the Organisation for Economic Co-operation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and ¹⁵High-Risk Areas, requests information from suppliers through internal and external tools, and conducts on-site inspections of ¹⁶its global suppliers to verify information and compliance with responsible minerals policies.

4.7 Indigenous peoples

The Operation will not generate impacts on indigenous peoples or on their lands, territories, or natural resources.

4.8 Cultural heritage

The Operation does not contemplate works, excavations, earthworks, or new physical activities that could affect tangible or intangible cultural heritage.

¹³ Samsung Knox is Samsung's security platform for protecting devices and data. It is an integrated protection system built into many Samsung products, especially phones, tablets, and some connected devices.

¹⁴ The Responsible Minerals Initiative (RMI) is one of the leading global initiatives to promote responsible mineral sourcing in global supply chains. It was created in 2008 and is part of the *Responsible Business Alliance* (RBA). Its objective is to help companies identify, assess, and manage environmental, social, and human rights risks associated with the extraction, processing, and commercialization of minerals.

¹⁵ https://www.gob.mx/cms/uploads/attachment/file/650191/Debida_diligencia_sector_extractivo.pdf

¹⁶ In 2025, it conducted on-site inspections of 219 global suppliers.

5. Proposed management measures

Given that the negative environmental and social impacts that the Operation could generate are not material, no additional specific management measures beyond those the Client is already implementing are proposed.

6. Additional information

For questions about the Project, please contact Garona Development, S.A. / Sistemas Logísticos y Corporativos ("SLC").

Additional information about Samsung Electronics and its sustainability approach is available on its ¹⁷Sustainability page and in its corporate policies on human rights, supply chain, environment, health and safety, privacy, information security, product quality, and compliance.

Name: Douglas Enríquez Obando
Title: VP of Technological Innovation and Financial Services
Phone: +502 3995 0091
Email: denriquez@slc.com.gt

For questions and comments to IDB Invest, contact:

Name: IDB Invest Communications Group
Email: requestinformation@idbinvest.org

Additionally, and as a last resort, affected communities may access the IIC's Independent Consultation and Investigation Mechanism (MICI) as follows:

Phone number: +1 (202) 623-3952
Fax number: +1 (202) 312-4057
Address: 1300 New York Ave. NW, Washington, DC, USA 20577
Email: mecanismo@iadb.org or MICI@iadb.org

¹⁷ [Environmental Strategy | Planet | Sustainability | Samsung Electronics](#)