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## 1. INTRODUCTION

*Corporación Inmobiliaria Vesta* is a company committed to the development and acquisition of industrial parks and buildings in Mexico.

As trustees responsible for our stakeholders and aware that our country's economic and real estate growth and development is closely linked to short, medium and long-term environmental and social impacts, we hereby state and reaffirm our commitment to the country's sustainable development through our Social Investment Policy and in line with our Social Responsibility, Environment and Governance Policy.

## 2. OBJECTIVE

The purpose of this policy is to define and establish the guidelines, principles, procedures and requirements for the application, approval, registration and delivery of resources for social investments made by Vesta at a national and international level, considering guidelines, such as the anti-corruption policy, that the collaborators involved in the donation process must observe. Therefore, the regulations established by Vesta's Social and Environmental Responsibility Committee must be complied with.

## 3. SCOPE OF APPLICATION

This policy is mandatory for all of Vesta's operations, as well as for all of the company's stakeholders, either directly or through any of its subsidiaries.


Vesta is committed to disseminating this policy among the different regions and interest groups, seeking to align their own policies with those of the company. The ultimate responsibility for adhering to this policy lies with the company's directors, with the support of the Social and Environmental Responsibility Committee (CRSA) and Sustainability Management.

## 4. REFERENCE DOCUMENTS

- Responsibility, Environment and Governance Policy
- Anti-Corruption Policy
- Vesta Complaints Channel
- Vesta's Code of Ethics
- United Nations Global Compact

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## 5. GLOSSARY


### Term

### Definition

<b>Governmental Entity</b>	Refers to business corporations, institutions, associations, foundations, agencies, departments and agencies owned or controlled by the government and other public entities (whether entirely or partially controlled), including diplomatic representations, research institutes, universities and hospitals; state authorities and agencies or diplomatic representations of foreign countries, at any level of government, as well as public international organizations and legal entities controlled directly or indirectly by the government of a foreign country.
<b>Donation</b>	Any agreement through which Vesta transfers economic resources, in kind, equipment, etc., to individuals or companies with the purpose of helping to improve the quality of life of vulnerable groups.
<b>Equipment or In-kind Donation</b>	Contributions to non-profit organizations that require equipment, furniture, electrical equipment or material of any kind for social purposes.
<b>Emergency Donations</b>	All donations responding to a humanitarian crisis such as a natural disaster or epidemic that requires rapid channeling, including monetary donations, medication and/or equipment. Emergency situations are defined based on the criteria of the World Health Organization. (see <a href="http://www.who.int/hac/donorinfo/g3_contributions/es/">http://www.who.int/hac/donorinfo/g3_contributions/es/</a> )
<b>Social Investment</b>	An action mechanism that integrates environmental and social factors for the benefit of communities and where the use of natural resources is conducted under sustainability criteria.
<b>NGO/CSO</b>	Civil organization, legally formed by individuals or legal entities, which operates independently of any

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government, and can take various legal forms. Its activities are aimed at achieving humanitarian, social and charitable goals, as well as the promotion and protection of human, economic, social, cultural and environmental rights. Civil Society Organizations (CSOs), Third Sector Entities and Non-Profit Organizations (NPOs) are synonymous.

**Sponsorship**

Economic contributions granted voluntarily and as part of an agreement, either to individuals or institutions with the purpose of obtaining a direct commercial benefit, and to be processed by the Marketing area at the corporate or regional level.


**Public Official**

Includes any person who performs a public activity, temporarily or permanently, whether or not in exchange for remuneration, and who is classified in the following:

- *Politicians.* Those in charge of any of the three branches of government and representing the interests of the State, as follows: President, Governor, Mayor and his team, Ministers of State, Secretaries of State or Municipalities, Senators, Representatives and Councilors.
- *Public servant.* Any person who works for the State, directly or indirectly, including police, firefighters, military, tax authorities, inspectors, and health agencies.
- Executives, representatives, agents or employees of any government institution, state business or related enterprises.
- Any person responsible for approving or influencing the spending of public funds, including those who hold paid positions, for example, an official advisor to any government institution.
- An officer or employee of any international organization.

For the purposes of this policy, in the broader sense, any person holding an executive position within a political party, a candidate for any political position, professors

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and researchers of any educational institution, universities and any other public or government-funded educational institution is also understood to be a public servant; employees and researchers of schools and educational centers as well as other government-funded research and development spaces; physicians working in public hospitals; state media journalists; employees of any trade association performing governmental or quasi-governmental functions; and up to second degree relatives of any of the foregoing.

**Bribery**

Offering or providing any donation, directly or indirectly, in cash or in kind, for the benefit of any public servant, political party and/or other person to obtain or retain business or to secure any improper advantage for Vesta, as described in the Anti-Corruption Policy..

**External Requests for Donations**

Generally submitted by nonprofit civil society organizations, low-income individuals, public officials, decision-makers, opinion leaders, and private companies that act as intermediaries for a donation request.


**Third Party Intermediary**

A third party intermediary is an agent, service provider, consultant, distributor, contractor, vendor, supplier or any third party, whether a legal entity or individual, other than a Trading Partner, contracted to assist Vesta in any act or business that involves or requires interaction with government authorities at any level in the states in which Vesta operates, including, but not limited to: customs agents, law firms, lobbyists and logistics companies.

This also includes third party intermediaries whose main role is to generate business or to promote the distribution, marketing or sales of their products and services, to facilitate the fulfillment of contractual obligations, to obtain licenses, permits and authorizations for the construction and opening of new headquarters, as well as to manage the local

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government market on behalf of Vesta's interests and representations.

## 6. DEVELOPMENT

All donations made for social investment purposes must be aligned with Vesta's values and its three lines of action on sustainability (section A), must be previously documented, made specifically for legitimate beneficiary entities and registered in accordance with applicable law.

Any request for donation must be submitted in writing and must describe as extensively as possible the purpose of the donation, its business and commercial nature and all details of the recipient.

Beneficiary entities must be investigated to determine whether it is a legitimate charity and to determine that it is not related to a public servant who may act or make decisions on behalf of Vesta in the future.

Approval and confirmation will be required from the Social and Environmental Responsibility Committee and the CEO, who must confirm that the resource is legal according to local laws and regulations of the place where the donation will be made.

The recipient of the donation must issue a written receipt specifying the amount received as a donation and guaranteeing that the donation will not benefit any public servant directly or indirectly.

### a. LINES OF ACTION


The scope of the guidelines for social and environmental projects to be supported or executed by Vesta encompasses all business operations, i.e., regions and corporate, either directly or through any of its subsidiaries.

The social projects to be approved by Vesta must be aligned with our three lines of social action:

- **Education:** Projects aimed at helping students/teachers achieve certain learning objectives and improve their social and economic conditions.
- **Inclusion:** Projects aimed at benefiting the most vulnerable sectors of the community, but specifically women, children, and people with some form of disability.

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- **Community development:**The process where members of a community come together to take collective action and generate solutions to common problems that may be related to environmental, social, economic, and other issues.


## **b. BENEFICIARY ENTITIES**

All entities benefiting from any of our resources to develop projects with Vesta, in terms of social investment, must comply with the following characteristics:

- A clear, well-defined and easily accessible social purpose that clearly identifies their activity and beneficiaries.
- All the activities performed by the organization must be aimed at the achievement of a social purpose, avoiding activities that are not explicitly contemplated in its bylaws. Specifically, projects aimed at the above-mentioned lines of action will be financed preferably.
- Philanthropic entities and/or CSOs that support preschools, elementary schools, middle schools, high schools, and universities, and organizations that develop projects related to the three lines of actions above.
- The planning of its activity must be clearly designed, as well as internal systems for monitoring and evaluating the activity, allowing us to measure the impact of the projects implemented, as well as the definition of project selection criteria and processes of the entities with which we collaborate. Priority will be given to entities with a strategic plan or an annual plan that encompasses the entire organization with quantifiable objectives, a timetable, responsibilities, and formally defined control and internal monitoring systems for the activity and beneficiaries.
- It must have a governing body effectively accountable for the efficient management of donated resources. The members must also publicly disclose their names, profession, public positions, kinship and affiliation with other members of the governing body and the organization's management team. The organization must disclose the relationships between members of the governing body and the suppliers and co-organizers of its activity.
- Recurrent communication of the activities performed, and the programs developed with the donations received.
- The organization must provide Vesta with its annual, economic and activity reports, with the corresponding audit report.
- Every beneficiary organization must provide evidence of compliance with legal obligations before the Tax Administration and Social Security authorities in accordance with the laws of each country.

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### c. ECONOMIC DONATIONS

Financial donations may only be provided to non-profit civil society organizations, in accordance with the legal provisions applicable to each country.

Economic donations may not be granted to:

- Individuals.
- Public and private organizations promoting proselytizing, religious or partisan interests.
- Public officials, opinion leaders, decision makers who work in public institutions, third parties involved and who can directly influence the contracting of Vesta.
- Political parties.
- Organizations with activities that conflict with Vesta's objectives, business values and service.
- Any type of officer, police, prosecutor, inspector or military.
- Donations that may lead to conflicts of interest between public entities and civil society organizations where both parties have a family or contractual relationship.
- Donations not aimed at serving the interests of the communities in which Vesta operates or that are not aligned with the company's three sustainability lines of action.
- Organizations with a history or suspicion of corruption, money laundering or support for terrorists.

### d. DONATION AWARD CRITERIA

The evaluations must be based on the data and information in "Annex I - Social Investment Check List", to be granted by Vesta. Only requests sent at least fifteen days prior to the date of availability of resources will be evaluated.

The donation award process is performed under the following criteria:


- Objectives and detailed description of the project (consistency, relevance, benefits and target audience).
- Compliance with Vesta's corporate strategy.
- Confirm that the donation will not yield any personal benefit to any public official or any person with a direct or indirect relationship with public entities.
- The impact and/or social benefit resulting from the resource to be awarded.
- Clear methodology to evaluate the different impacts of the project.

### e. SOCIAL INVESTMENT REQUESTS

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All grant applications must be submitted using "Annex I - Social Investment Check List", which must be completed by the applicant and sent via email to the Sustainability Department. The Check List must include the following information:

- Identification of the applicant (name and position).
- Beneficiary entity (name of institution, legal representative and full address).
- Description of the planned initiative.
- Strategic line/field of action of the beneficiary entity and the specific purpose of the resource.
- Assessment result.

**f. SOCIAL INVESTMENT ANALYSIS AND APPROVAL**

The Social and Environmental Responsibility Committee (CRSA) is responsible for approving social and environmental projects and requires prior approval from the company's CEO. Also, the Sustainability department must evaluate the donation request, as a result of the evaluation of "Annex I - Social Investment Check List" and an analysis of the beneficiary entity.

The approval process is described in Figure A.

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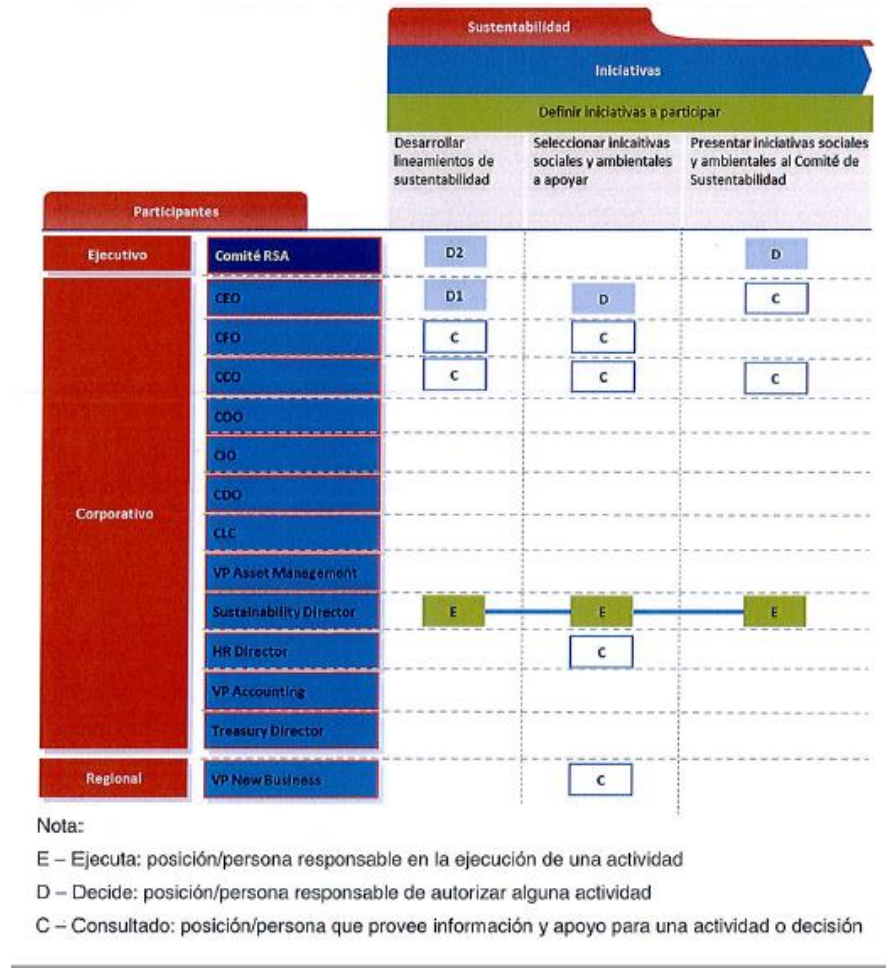
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Figure A




- After the request is assessed, a written response will be provided via e-mail to the beneficiary entity, informing whether the request is approved or rejected. This response must not take more than fifteen business days after the Social and Environmental Responsibility Committee (CRSA) of December of each year.
- In any case, the individuals responsible for approving resources must review and ensure that there is no conflict of interest in the process.

#### **DRAFTING OF DONATION CONTRACT**

The Legal Department will draft a standard contract for donations, which must be signed by the person legally responsible for the contracts at the corporate level, as well as by the legal representative of the beneficiary entity.

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The contract prepared must contain all the necessary anti-corruption clauses, the purpose of the association, its term, the rights and obligations of each party, the contact people, and the jurisdiction in which it is signed. It must also include the Project Proposal as an annex.

**g. ACCOUNTABILITY**

The beneficiary entity must provide a written donation receipt, under its name, listing the product as a donation received and guaranteeing that it will not be misused. Also, this receipt must be delivered prior to the donation.

The resource may be divided into three payments and the delivery dates of the resource will be subject to the duration of the project, as follows:

- **First payment:** Start of project (40%)
- **Second payment:** After submitting the progress report; upon achieving 50% of the project progress. (40%)
- **Third payment:** End of the project and submission of final report (20%)

The applicant must complete the reconciliation performed by the beneficiary entity and the amounts paid by Vesta (as recorded in the values and information in "Annex I - Social Investment Check List", the Contract and the donation receipt).

The donation accountability process must be included in the audit plan to guarantee that the necessary audits are conducted. Any inconsistencies detected in the use of resources must be reported to the Social and Environmental Responsibility Committee and the Audit Committee.

Also, the beneficiary entity must submit a written report with the results obtained from the donation, specifying the economic, social and environmental benefits obtained from the donation, including photos and a description of each of the contributions made.

**h. DONATIONS IN EMERGENCY SITUATIONS**


All donations in emergency situations, whether economic or in kind, must be approved by Vesta's CEO and reported to the Social and Environmental Responsibility Committee.

**i. PROJECTS WITH TAX INCENTIVES**

All cultural, artistic and sports projects and those covered by the tax legislation in force in each fiscal year are considered under this category, provided that they adhere to Vesta's values and objectives.

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However, the authorization process for the award of these resources will be as follows:

- Review of the fiscal and social feasibility of the project by the Accounting department and the Sustainability area.
- Evaluation by the CEO and CFO.
- Comments and recommendations by the Social and Environmental Responsibility Committee to the Audit Committee.
- Approval by the Audit Committee of the amount destined for the implementation of the initiative.

**j. SPONSORSHIP**

For Vesta, sponsorships with economic contributions granted voluntarily and as part of an agreement, are awarded to individuals or institutions in order to obtain a direct commercial benefit and must be managed by the Marketing area at corporate or regional level. Therefore, this process does not require the involvement of Vesta's Sustainability area.

**7. CASES OF VIOLATION OF THE SOCIAL INVESTMENT POLICY**

- No collaborator of Vesta, nor any party working on its behalf, may make, offer to make or promise to make any donation, directly or indirectly, in money or in kind, for the benefit of any public official, political party or candidate for political office to obtain or retain business, or to secure any improper advantage for Vesta, regardless of whether or not any benefit is received.
- No donation may be provided or offered to a public official in exchange for recommending or contracting Vesta's products and services or a commitment to continue doing so.
- An express violation of the Social Investment policy and the Anti-corruption policy with the allocation of resources to a charitable organization affiliated or sponsored by a public official, their relatives or associates.


**8. COMPLAINT OF VIOLATION OF THE SOCIAL INVESTMENT POLICY**

All Vesta employees are required to report and record any non-compliance with the Social Investment Policy. If any employee has knowledge of a relevant situation or behavior that violates this policy, it must be promptly reported but may not investigate the matter on their own.

People outside of Vesta may also file complaints or report problems regarding Vesta staff regarding the donation policy.

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All employees are required to cooperate in internal or external investigations of alleged policy violations.

All allegations of policy violations must be reported immediately to the Ethics Committee, either by telephone (01800-04-Ética (01800-04-38422)), the internet at <https://www.nuestrocompromisoetico.com/?l=es> or email at [reporte@nuestrocompromisoetico.com](mailto:reporte@nuestrocompromisoetico.com)

## 9. SANCTIONS FOR VIOLATIONS OF THE SOCIAL INVESTMENT POLICY


All violations of the donation policy will be reviewed directly by the Audit Committee, the Social and Environmental Responsibility Committee and the Ethics Committee, which, according to the severity of the violation, will define the specific sanctions, which may range from the cancellation of the donation, the suspension of the employee or employees responsible, termination an investigation procedure with the corresponding authorities.

## 10. RESPONSIBILITIES

<u>Role</u>	<u>Responsibility</u>
<b>Social and Environmental Responsibility Committee (CRSA)</b>	<p>It is a permanent committee responsible for determining strategy, verifying compliance and evaluating the company's performance in terms of social responsibility and sustainability.</p> <p>It consists of experts in these areas and includes at least one member of Vesta's Board of Directors.</p> <p>All projects submitted for approval by the Investment Committee must receive a recommendation from this committee to ensure compliance with this policy and to assess potential environmental risks.</p> <p>This committee will approve the strategy and budget of the Sustainability area with prior approval by the company's CEO.</p>

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### **Sustainability Management**

It is responsible for managing the social and environmental needs of the regions and businesses, promoting communication between the parties, coordinating and organizing all CRSA activities, and developing tools to help the regions comply with Vesta's SR and Sustainability strategy. It is responsible for:

- Identifying, validating and signing agreements with local and national NGOs.
- Preparing the Annual Report following the GRI methodology and with the support of the areas involved.
- Sharing references and good practices with local areas.
- Proposing projects and initiatives that contribute to the fulfillment of this Policy.

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**Regional Areas**

They are responsible for the dissemination of this policy and the SR activities established by CRSA, as well as raising awareness of SR and Sustainability. In addition, they actively collaborate with the Sustainability Management for the preparation of the Annual Report. They are also in charge of the relationship with NGOs, specifically:

- Identifying needs for collaboration with local NGOs.
- Monitoring and managing the relationship with local NGOs.
- Managing corporate volunteering activities at the local level.

**Vesta Collaborators**

Understand this policy and regularly update knowledge of these regulations.

**11. ANNEXES**

**ANNEX 1: Social Investment Check List**

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