

Sustainability Report









CONTENTS

Chapter 1 About This Report p.4

Chapter 2 Messages from Senior Management p.6

Chapter 3 Milestones 2023 p.10

Chapter 4 Corporate Profile and Governance p.16

Chapter 5 High Impact Business **p.32**

Chapter 6 Employees p.42

Chapter 7 Sustainability p.52

Chapter 8 Planting in Fertile Ground p.90

About This Report



An Era of Transformation

Change is a constant in our current society. Cultural, social, economic, environmental, and political transformations are becoming more frequent and significant in their impact. The increase in digitalization and the consolidation of an industrial and technological revolution categorize us in an era 4.0, characterized by an interconnected and intertwined world where the influence and reach of each player is magnified.

In this context, CODE Development Group (CODE) frames its philosophy of promoting the sustainable development of our country, its communities, and its inhabitants, through the generation of innovative solutions in conjunction with an ecosystem of commercial partners, local suppliers, technology, and human talent.

CODE Development Group, a corporation that develops, manages, and operates real estate projects under the Free Trade Zone Regime, presents its second sustainability report, covering its real estate developments as well as its companies Evolution Free Zone, Coyol Free Zone, and Lumino, for the period from January 1 to December 31, 2023

This report does not consider the companies operating in our parks, nor do they have a scope of action within the management of CODE Development Group.

The data and results of social, environmental, and governance performance directed at our stakeholders and society, in general, respond to the concern of mitigating the effects that threaten sustainable development and the United Nations' commitments outlined in the 2030 Agenda.

with the Sustainable Development Goals, the fundamental topics of Social Responsibility, the voluntary ISO26000 standard, and the principles and values that have been an essential part of our activities.

This alignment is particularly significant in the case.

The content presented in this document is aligned

This alignment is particularly significant in the case of **Evolution Free Zone**, a park under construction which business strategy is designed in complete harmony with sustainable development. It highlights the participation not only of the established companies and those to come, but also of the employees and communities in the western part of the Greater Metropolitan Area near the project.



CODE Development Group has its headquarters in San José, Costa Rica, Santa Ana City Place, Third Floor, Tower B.

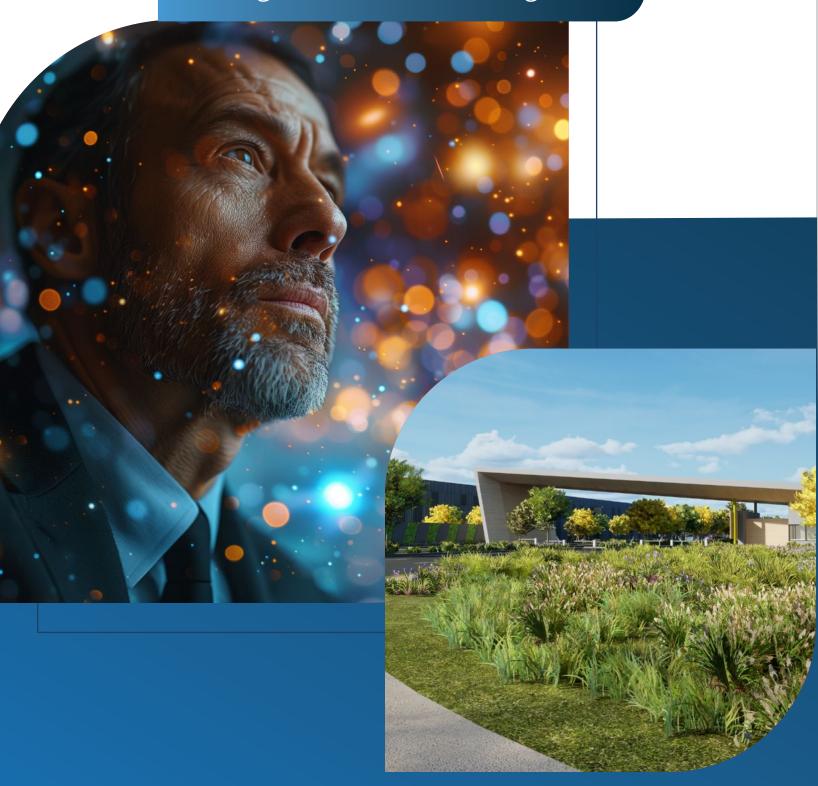
Contact for inquiries or more information about the report:

Telephone: 2435-6081

E-mail: lvargas@code-cr.com



Messages from Senior Management



At CODE Development Group, a business vision guided by **ethics and humanism** drives each of our actions. With each projec in which we participate, we seek to promote the sustainable development of our communities and our country, planting the seeds of a future of opportunities for this and future generations.

Our projects **Coyol Free Zone and Evolution Free Zone** are globally recognized as examples of the ability of Costa Rica to integrate into dynamic global value chains. These projects have become icons of progress that combine talent, sustainability, and technology, creating advanced ecosystems.

This unique connection has resonated with prestigious companies in the **Life Sciences Industry**, attracting investments that translate into thousands of quality jobs in the localities surrounding our Free Zones. Together, we have forged synergies with top-tier local suppliers who not only meet rigorous international standards, but also are key players in our transformation into a medical device hub.

With **Evolution Free Zone** located in the Western Region, we are preparing to take a significant leap in creating job opportunities beyond the Greater Metropolitan Area. In the coming years, **more than 20,000 jobs will emerge** from this effort, along with social and ecological projects that will flourish for the benefit of the community and nature in the neighboring cantons.

We are proud to present our management results for 2023. With this Sustainability Report, we share in detail our development vision and the actions that our business group and our parks, Evolution Free Zone and Coyol Free Zone, along with our educational innovation, Lumino, have taken to turn this vision into reality.

On every page of this report, we invite you to discover how our passion for **sustainable business** has transformed into the legacy we are committed to leave for everyone.







In 2023, CODE Development Group marked a significant milestone in its trajectory with the constructive progress of Evolution Free Zone, our latest development located in Tacares de Grecia. In this first year since its opening, six renowned companies in the Life Sciences and Smart Manufacturing industries have chosen to establish operations in the Park, promising thousands of development opportunities for the Western Region of Costa Rica.

On the other hand, Coyol Free Zone continues to consolidate itself as the core of Life Sciences **Industry development in the country.** It is the main exporter of medical devices in Costa Rica, with 33 companies employing more than 23,000 people. For the fourth consecutive year, Coyol Free Zone was named the Best Free Trade Zone in America, standing out as a model of industrial excellence for its ability to generate high-value export products and services for the global market.

Our excellence is based on **constructive innovation** and the integration of sustainability in our operational processes, along with the dedication of our qualified human talent, keeping us at the forefront of the real estate sector. Additionally, we remain committed to providing our talent with opportunities for professional growth through Lumino, a training platform that adapts professional skills to market demands.

Our business strategy is perfectly aligned with our sustainability philosophy, combining efforts so that our social, environmental, and economic projects generate a significant and positive impact on all our stakeholders, especially focusing on the communities where we have a presence. This entails a commitment to progress and development in every corner of our areas of influence.

With the vision of maximizing our positive impact, we are dedicated to strengthening job creation, productive chains, human talent training, environmental projects, and commercial innovation, all under the banner of sustainable development.

Innovative, specialized, and ethical: this is how CODE Development Group defines itself, and this is how we will continue to be faithful to our formula for success that has guided us for over two decades of leadership in the real estate sector of Free Trade Zones.















"Innovative, specialized, and ethical: this is how CODE Development Group defines itself."

Milestones 2023



We share a summary of the **highlights** throughout 2023 in the environmental, social, and governance areas derived from the actions carried out by the companies of CODE Development Group.



Signing of contracts with five new global companies (the first was executed in 2022) that chose Evolution Free Zone to operate in Costa Rica, turning this new park into the fastest-growing business ecosystem in Costa Rica.



Evolution FREE ZONE













350 INA course placements among employees of the Free Zone companies, adding to the more than 1,400 people who have been trained.



1,642 people joined the more than 12,000 who have completed the course to work as Manufacturing Operators.



Corporate Profile and Governance



Strengthened in our Corporate Identity

Our experience accumulated over **more than two decades** allows us to adapt our corporate identity as changes in the global market arise, and new demands and expectations in business behavior emerge.

We are a flexible and resilient company, open to these natural transitions. For this reason, our vision, purpose, and values integrate essential elements of business activities as managers of industrial parks with a firm commitment to sustainable development.

During 2023, we began a process of redefining our corporate strategy, reaffirming our **vision**, **purpose**, **and corporate values**. The design of this new path included the participation of employees from different hierarchical levels of the company who had the opportunity to share their ideas and perspectives on the future path of CODE Development Group.

Our **new corporate strategy** is guided by the following:





Vision

To be leaders in real estate development for the business sector in the Free Trade Zone, being at the forefront of innovation and sustainability practices, incorporating an ecosystem of complementary services that contribute to the overall competitiveness of the companies and our developments.



Purpose

We are the **strategic ally** of our clients, providing them with world-class operations through **innovative and sustainable solutions.**



Values

Innovation
Humanism
Ethics
Sustainability
Excellence

Footprints of Success

The senior management in charge of CODE Development Group has over 20 years of experience in the country's real estate sector, contributing to the growing dynamism of Foreign Direct Investment and high-value-added exports. This has been achieved through the construction and management of industrial parks that primarily host companies engaged in the production of medical devices for the **Life Sciences cluster**.

After a successful career with its first business complex, Coyol Free Zone, operating since 2007, the company has started **a new era of transformation** with the development of its new technological and industrial park under the Free Trade Zone Regime: **Evolution Free Zone.** This high-tech business complex will debut with AVNA (formerly known as Okay Industries) and other world-renowned companies in the medical device and smart manufacturing fields. In the medium term, they will be joined by other companies that have chosen Evolution Free Zone as their headquarters.

All the companies investing in our new Free Zone will share common characteristics: buildings that meet global quality standards, promotion of global ideas, and having experienced human talent committed to constant research and development.



The Park offers multiple **advantages**. Geographically, it has direct access to the Northern Inter-American Route, the Bernardo Soto Highway (Route 1), crucial for the road and export connections of the country, including proximity to the Juan Santamaría International Airport and ports in the Pacific and Atlantic. Additionally, its long-term vision facilitates a high capacity to grow and expand in an orderly manner and the ability to provide top-notch infrastructure and complementary services.

As a corollary, the development of this Free Zone harmonizes with the **National Development and Public Investment Plan 2023-2026 of Costa Rica.**

We have imagined a sustainable park, integrated with the community, with global standards of excellence to promote Foreign Direct Investment, thus contributing to the generation of opportunities to improve the quality of life of the human talent that works there and maximizing the value of each product and service produced in its campus".

Managing Director

CODE Development Group

Evolution FREE ZONE

Evolution Free Zone: A Marked Difference with Innovation and Technology

The **transformation** that CODE Development Group began in 2022 with the launch of Evolution Free Zone also marks a stage of **renewal**, **adaptation**, **and breaking boundaries** concerning world-class business parks.

This process is not isolated, but responds to the alignment of several factors. On the one hand, the organization has been able to capitalize on its vast experience in the real estate field, allowing it to ascend to a higher level. On the other hand, its ability to interpret market and foreign investment trends enables it to seize the opportunities that the country offers to multinational companies in the **Life Sciences cluster**.

The implementation of a **solid marketing and communication strategy**, together with the support of institutions dedicated to the promotion and attraction of investments, were **key factors** for Evolution Free Zone to have signed contracts for the installation of six world-class companies by the end of 2023.

These first companies, and naturally those that will follow, will contribute significantly to the corporate vision of creating new economic development poles, positively impacting employment, innovation, education and growth, both locally and nationally. We present a synopsis of each of the companies that will be the first tenants of Evolution Free Zone.







Projected employment: 200



Facilities: 5 000 m² (Footprint Phase I)



Headquarters: Connecticut, USA



Product:

Medical Device Industry Components

AVNA Press Release







Projected employment: 150



Facilities: 3 500 m² (Footprint Phase I)



Headquarters: Minnesota, USA



Product:

Development and manufacturing of medical device components that incorporate microelectronics, biosensors and electromagnetical navigation sensors.

Intricon Press Release



Projected employment: 300



Facilities: 7 000 m² (Footprint Phase I) Inversión: **US\$ 15 millones**



Headquarters: California, USA



Producto:

The company has developed two types of minimally invasive devices to try and eliminate blood clots in veins and arteries, eliminating the use of pharmaceuticals for thrombosis.

Inari Medical Press Release



Facilities: 3 750 m²

(Footprint Fase I)

Headquarters:

Pennsylvania, USA

Product:

The plant will house state-of-theart injection molding and support equipment, a fully equipped quality lab, tool and die support,

office space, training and on-site

order fulfillment areas.

Accudyn Products Inc Press

<u>Release</u>





Projected employment: 100



Facilities: 10 000 m² (Footprint Phase I)



Trelleborg, Sweden



Product:

It offers extrusion, injection molding and plastic and silicone molding services, as well as manufacturing of components, sheet, combination products, tubing and hoses, and finished medical devices.

<u>Trelleborg Healthcare & Medical</u> <u>Press Release</u>







Headquarters:







Projected employment: 3500

in the next three years (starting on September 2026)



19 000 m² (Footprint Phase I)



Headquarters: New Jersey, USA



Product:

One of the leading global companies in the medical industry with 130 years of history. Represents the company's largest investment outside the United States, where it is headquartered. The choice of Costa Rica was based on an exhaustive search and analysis process that included several geographies around the world. The company impacts close to 300 million patients a year who are treated with its products.

Johnson & Johnson Medtech Press Release



Committed with the Western Region

The year 2023 was an active period from a construction perspective, involving large-scale works. Among them, one of the most relevant was the temporary relocation of Route 1 to a marginal passage while the construction of the **elevated bridge** was completed. This roundabout will provide direct access to the Free Zone and streamline both the entry and exit of vehicles from and to the industrial park, **without affecting the usual flow of this national highway** in the West-San José direction and vice versa.

Formerly, the road had only two lanes towards San José and one towards the western zone of the country. **Now two lanes per direction will be added,** as well as an elevated bridge, and an access network through marginal roads at the bottom to the access and exit roundabout to and from Evolution Free Zone.

The bridge required an investment of over \$12 million and will be completed within the first months of 2024. It was **donated** by CODE Development Group to the State of Costa Rica.

The coordination with the Ministry of Public Works and Transport (MOPT) for both the bridge's construction phase and traffic flow management was very satisfactory to minimize any impact on the regular users of this road. The logistics were detailed in a traffic management plan approved by MOPT and supported by the Traffic Police.

The plan included nighttime work, changes in vehicle passage routes to facilitate infrastructure work without interrupting traffic, and adequate signage to prevent accidents.

Thanks to meticulous planning of vehicular movement and proper signage, along with other factors involved in this type of construction, **a smooth transition was possible** for the section of Route 1 that needed to be diverted by the bridge under construction.

Another task that required a high degree of coordination was the placement of the main beams of the bridge, manufactured in Costa Rica specifically for the project, which involved complex transportation logistics due to their size and weight. This was followed by the concrete pouring, abutments, and installation of these structures.

Additionally, given the magnitude of the new bridge, the construction of approach walls for the elevated passage, with a total length of one and a half kilometers, was also undertaken.

Next Steps? The most important include the opening of direct connectivity to Route 1 and the preparation of land for the second stage. These actions will allow us to develop a boulevard and a green corridor that will cross our project from north to south. This will serve as a connector to the future wooded areas to be developed on the banks of the Catalonia Creek (Rosales River) and the Espavel Creek.

Evolution FREE ZONE



A Million Cubic Meters of Earth

Internally, significant processes were also carried out, which deserve to be mentioned. First, the **earthwork** that began in the fourth quarter of 2023 was completed. This involved **more than a million cubic meters of earth removed**, being used in other areas of the Free Zone to maximize the use of resources.

It is important to mention that Evolution is located on a **124-hectare property**, of which 55 hectares are allocated to the first stage of real estate development.

A second key moment regarding the infrastructure of the Free Zone was the **installation of pipes and the construction of retaining walls** in the northern part of the property, among other reasons, to protect the primary forest area of the site. These walls total more than 150 linear meters, some reaching up to 19 meters in height.

The **lighting system** was built, allowing for the first electrical connection and those planned for common areas. This involved extending electricity from a distance of five kilometers.

The prominent structure of the **portico** that will welcome to the park, the wastewater treatment plant, and the potable water connections, were also notable milestones during that period. Just like the electrical connection, the potable water supply required systems from a distance of eight kilometers. The treatment plant is a 5,000 square meter structure.

All of this leads towards a greater objective, transform the business park into a completely smart environment, as automated as possible



On the other hand, the enclosures of the industrial warehouses have been improved in terms of acoustics, absorption, rigidity, and greater fire resistance, as well as the use of materials that reduce heat absorption, consequently decreasing air conditioning consumption within the plant.

The use of **TPO** (thermoplastic polyolefin) technologies that contribute to the waterproofing of structures and a proper installation of telecommunications cabling are clear examples of this directive in construction.



All this points towards a greater goal: transforming the business park into a completely intelligent and as automated as possible environment. From an operational point of view, this includes controls over the amount of water entering the pipes, its pressure, the functioning of the pumping system, the detection of any obstructed irrigation valve, and its exact location.

Another great advantage of this smart park is the **optimal use of resources.** For example, 100% of the water from the treatment plant will be reused for irrigating green areas. Additionally, it will feature a **solar park** that will provide renewable electric energy to all common areas, streets, the portico, the treatment plant, and general lighting.

These works could not have been successfully completed without strict adherence to the international Occupational Safety and Health Administration (OSHA) standards, which promote high safety standards at work, timely follow-up of related complaints, and a preventive approach to workplace injuries. It is also essential to adhere to internal safety, quality, and environmental manuals.

For a project of such magnitude, **contractor management** is essential as it involves several companies on the same project. For example, four of the largest companies in the country are required for earthwork. The same logistics apply to industrial warehouses, the portico, and other construction projects.





The Voice of Experience

Since its opening in 2007, Coyol Free Zone has established itself as a **model business park** attracting foreign investment in the Life Sciences industry, especially in the manufacture of high-value-added medical devices for the international market, standing out for its **quality, innovation, and technology.**

Throughout its **17 years**, these attributes have allowed the park to receive multiple recognitions and repeatedly rank among the **10 Best Free Zones** in the World and the American continent.

Located in Alajuela, near the Juan Santamaría International Airport, and with easy access to routes 1, 27, and 32 that connect the Greater Metropolitan Area with other regions of the country, Coyol Free Zone contributes more than 30% of the total exports of goods from companies in the manufacturing segment under the Free Trade Zone Regime of Costa Rica.

At Coyol, we do not stop
innovating and seeking new
technological tools and
processes that allow us to have
standardized and more efficient
processes. Without a doubt,
it improves our construction
management, but more
importantly, our customer
service."

José Araya
Technical Director of Engineering
CODE Development Group



In 2023, the park continued with the **construction of new facilities** for companies that announced investments the previous year, as well as the **expansion** of already operational plants.

Four expansion contracts were executed by companies already based in the park and planning to increase their operations and capacities in the coming months.

Shockwave Medical, which announced its investment in November 2022, is dedicated to manufacturing intravascular lithotripsy (IVL) to treat severe cardiovascular diseases caused by calcification. They have a first building of 3,500 m² and a mezzanine of 1,900 m² (Phase 1).

During the period covered by this report, Coyol Free Zone also began the second phase of the **Shockwave** plant, which included the design and construction of works delivered in February 2024. New constructions also include almost 8,500 m² of multitenant buildings, modular rentable spaces adapted to each tenant's needs, where companies like **Riverpoint CRx LifeSciences and Roche** will develop their activities.

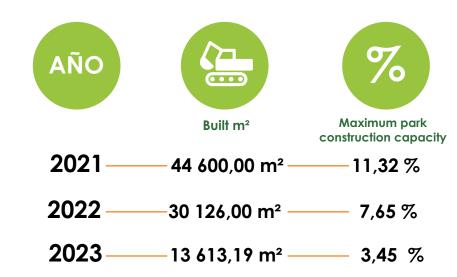
An expansion of a building of 3,380 m² was delivered in April 2023 to **Moog Medical**, corresponding to the second stage of its building plus an internal renovation that added another 2,500 m². Additionally, the design for the expansion of the building occupied by **Segex** to be delivered in the first months of 2024, began.

Steris, with 12 years of operations in the country, began the construction of the third stage, an industrial warehouse of 1,535 m² that will be added to the existing 7,060 m² at the end of 2023.

In August 2023, the construction of a 4,000 m² multitenant warehouse began, which will be occupied by **ThermoFisher**, a company that has been present in Costa Rica for almost 10 years. Additionally, another 5,000 m² is being built for **Freudenberg Medical**, whose design phase began in October 2023.

Two minor but significant projects for the business park should be highlighted. The first is a 93 m² showroom at the **Customer Service Center for Alleima**, a Swedish company manufacturing advanced stainless steel products and special alloys, which will start operations in the first half of 2024. The second project was a renovation in the **Foodcourt of Centro Coyol**.

Key Figures COYOL



Total built in 17 years of park existence **309 212 m²**



Companies Based in Coyol Free Zone

The table shows the number of companies installed in Coyol Free Zone at the end of 2023: 35. Despite the table showing 36 companies, St. Jude Medical and Abbott Medical are counted as one because, after the acquisition of the former by Abbott, both companies merged. Likewise, Utitec Medical became Candence. Apollo Endosurgery is now part of Boston Scientific and Shockwave has been absorbed by J&J.

2007	Hologic
2008	St Jude Medical / Sensient Flavors / Moog Medical
2009	Cadence / Establishment Labs
2010	Abbott Medical / Confluent Medical-Nitinol Philips / Merrill's Packaging
2011	Microvention-Terumo / Freudenberg Medical / Medtronic / Steris
2013	Smith & Nephew / Coopervision / SMC Ltd.
2014	Theragenics Corporation / Apollo Endosurgery / Smiths Interconnect
2015	> Precision Coating
2016	Resonetics / Segex
2017	Cooper Surgical / Cardinal Health
2018	ThermoFisher / Poliart
2019	Crx Life Sciences / Cirtec Medical
2020	Teradyne / Nevro



DESIGNED TO INNOVATE

Coyol Free Zone served as the perfect laboratory for implementing new procedures related to inspections, quality, and traceability throughout 2023. The challenges experienced result in innovation and standardization in all construction and administrative processes with a single goal: always seeking improvement in customer service.



1.Involvement of the Consulting Team

Designers and inspectors actively integrated into the official project management tool of the company. This allowed them to deepen their knowledge of the tool, identify where to find specific information, such as quality tests divided by discipline, the quality plan and its follow-up, and relevant observations.



2. Quality Plan Update

Existence of an official Quality Plan template with a series of essential tests and reviews that each project must meet. This template has been refined and improved in collaboration with the designers.



3. Chemical Waste Traceability

Manages the traceability of all chemical waste used in the project through an authorized manager.



4. Soil Material Optimization

Additional soil studies were conducted, allowing for the optimization of existing material on the site, generating savings of almost 30% in earthwork.



5. Environmental Area Strengthening

Increased environmental supervision through the creation of an environmental manual, checklists, and a social and environmental management



6. Construction of the First Anchored Wall

In collaboration with Langan Engineering & Environmental Services, a U.S. company offering integrated civil engineering and environmental consulting services, the first anchored wall in the park was constructed. The wall, approximately 1,315 m², included the installation of **438 anchors** along its structure, reaching a maximum height of 14 meters.



2021

2022

Bayer

Roche (Operational in 2024) Alleima (Contract Signed)

lumino •

Reservoir of Talent and Knowledge

One of the main driving forces that has kept us in leadership positions worldwide is our ability to offer companies in our manufacturing parks human capital that is **up-to-date and knowledgeable enough to meet the required job profiles.**

Lumino was created precisely to scale that added value that has differentiated us for two decades. It is an **educational solution**, offering a robust proposal of courses and certifications for companies and individuals interested in acquiring skills and knowledge that allow them to improve job opportunities in industries such as **Life Sciences**, **Smart Manufacturing**, **and Knowledge-Intensive Services**.

Through this platform, we offer **training options to active employees** of the companies based in the Park to reinforce or acquire new knowledge. We also target **students and professionals** who want to become suitable candidates to work in these industries.

Our **educational offering** is broad due to the varied need for talent of the companies. It includes courses in manufacturing, technology, supply chain, administration, finance, human resources, and essential skills.

With this learning center, we aim to **enhance the recognition of the country as a hub of Life Sciences companies**, highlighting the impact on creating quality employment and responding to the demand for skilled and updated talent required by multinational companies.

We join the effort of the country to create new university careers that respond to labor market demand. With our long history on the subject, we know that the industry constantly demands new skills from its active and potential personnel. We act as a permanent sensor of these human capital demands through CODE Development Group's talent attraction services, and our active presence in various industry forums.



During 2023, Lumino aimed to begin its **brand positioning and market recognition** through a versatile, personalized, and diversified educational proposal.

Besides **launching the brand** through social media, such as Facebook, Instagram, and LinkedIn, and opening the first courses in June, several significant results were achieved, and are detailed below.

- 137 active students with a robust database.
- ♦ 12 courses offered both in company services and open public training.
- 23 companies acquired training services or slots for open public courses.
- 15 alliances established with educational institutions and training companies, including ADEN, TEC, Door Training, PXS, Nexus Wise Human, Conexo, and Instituto Vargas Matamoros, among others.
- The catalog includes more than 100 courses in various specialty areas.

After materializing in a single year its conceptualization, birth, positioning, and placement of the first training courses in 2023, **Lumino** is preparing to become one of the leading options in specialized training for the Life Sciences and Smart Manufacturing sectors. It aims to be certified as a global regulatory entity and offer an innovative educational proposal, including the construction of international alliances.



Carolina Zamora

Education and Development Programs Manager CODE Development Group



High Impact Business





HECTARES

124 in total, with 55 hectares allocated to the first stage of development.



LOCATION

Tacares, Grecia, Alajuela.



CHARACTERISTICS

High-tech business park based on innovation and a nextgeneration ecosystem to attract world-leading companies.



PRODUCTIVE SECTORS

Life Sciences, Smart Manufacturing, High Technology, and Knowledge-Intensive Services



FIRST COMPANY **BASED IN THE PARK**

By April 2024, six companies had finalized the negotiation and contracting process to operate their plants in the Park: AVNA (Formerly Okay Industries), Intricon, Johnson & Johnson MedTech, Inari Medical, Accudyn Products Inc., and Trelleborg Healthcare & Medical.





STATE AT THE END OF 2023

Final stage of the first earthwork and construction of general infrastructure of the Free Zone, overpass on Route 1, and construction of buildings for the first companies.

> administration, and engineering roles.



DIRECT EMPLOYMENT GENERATED

More than 400 construction jobs during 2023. It is estimated that by 2024, this number will increase to more than 1,000 employees in construction projects.

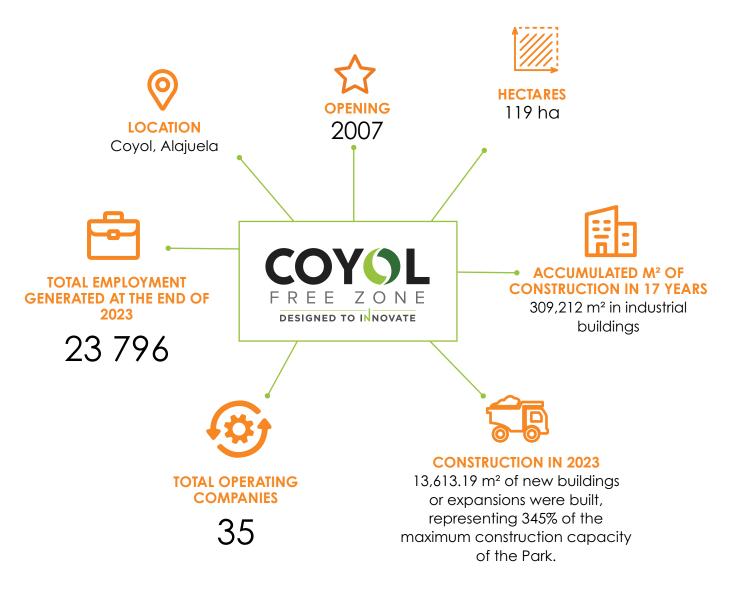


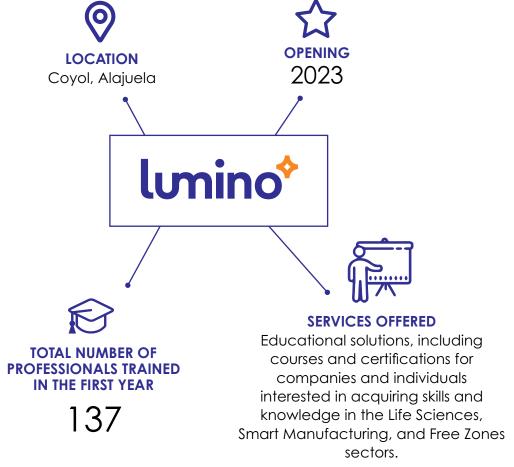
INTEGRAL VISION

Prioritizes integration with local communities, such as Alajuela, San Ramón, Grecia, Atenas, Naranjo, Palmares, Poás, Zarcero, Sarchí, and others in the West, generating new employment, education, and business opportunities.











Optimal and Safe Operation of the Parks

CODE Development Group, as a leader in the real estate industry and specializing in the construction of Free Zones, acquires a new operational dimension with Evolution Free Zone, serving as a catalyst to leverage its **experience**, **maturity**, **and trajectory in Property Management**.

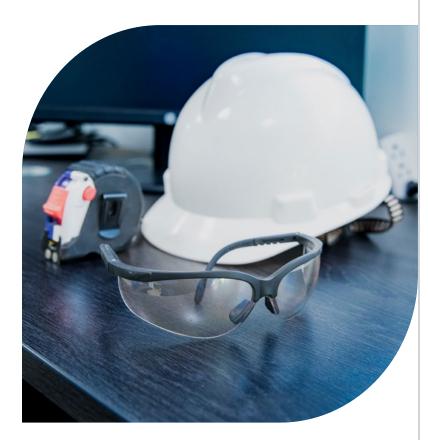
Capitalizing on this solid trajectory is an explicit objective of the Senior Management; for this reason, the **operational** area has been strengthened, making it the backbone of the organization and allowing for comprehensive solutions throughout the entire life cycle of the industrial parks managed by CODE Development Group. This overall vision for the future development of Evolution Free Zone also extends to other primary actions.

Evolution Free Zone is a Free
Zone development committed
to sustainability and operational
efficiency through its innovative
Park Management Information
System (PMIS), which will facilitate
monitoring and optimizing the use
of resources both in common areas
and those used by its clients.

This system of operations and facilities aims to offer **high-quality services** to developments and the companies based therein to maximize the value and performance of real estate assets.

The management, operation, and supervision of the parks are carried out in close collaboration with the owners, ensuring **effective resource management and diligent compliance** with maintenance and safety standards.

Over the years, initially with Coyol Free Zone and now with Evolution Free Zone, the Group has deeply understood the needs and challenges of such projects; therefore, the focus is on **results**, **quality**, **and personalized solutions**, maintaining highly trained and qualified teams in construction and real estate development.



A primary task of this area is to establish **solid** and long-term relationships with its clients; maintain open, transparent, and collaborative communication to respond efficiently and quickly to their demands, and ensure the park's integral operation.

This mechanism transversalizes requirements from marketing, engineering, mobility, technology, sustainability, and human capital, among other areas, to provide support and assistance to the end clients, suppliers, and employees in a two-way process.

It operates as an **integral management center** to promptly solve problems, inconveniences, or specific situations that arise without interrupting or affecting the daily tasks of direct managers.

CODE Development Group, with this new vision of **unifying service**s, holds the reins of development, construction, improvements, and operation of the parks.

We offer a service platform that seeks to address all operational needs through a user accompaniment process."

Gonzalo Apéstegui Operations Manager CODE Development Group

The Operations and Facilities division focuses on the following **strategic objectives** for the proper fulfillment of its activities:



Maximizing the **value** of the Free Zone



Building lasting **relationships**



Advanced and effective property maintenance



Comprehensive property security



Guaranteed operational efficiency

To achieve these objectives, we focus on three **specific areas:**

Operation: Efficient management of essential services, such as water, electricity, and communications.

Security: Advanced security measures to protect tenants and users.

Maintenance: Comprehensive property maintenance from landscaping to structural repairs.

Technology in Evolution Free Zone

Modernization

Access control systems

Extended security system

World-class software (Park Management Information System) for integral and complete industrial park connection

Solar energy systems

Fire control system



Reading the Environment, Meeting Demands

The **innovative approach** of CODE Development Group ensures complete and efficient processes. All areas of the company are fully committed to adaptation and transformation agendas.

Specifically, the **Quality** area has based its strength on procedures, policies, and a management system that adapts to new market requirements, and facilitates the correct management of constructions. These tools are designed to improve planning, monitoring, and delivery of works, as well as to identify and correct problems before they arise.

In line with this approach, the recently updated and published Quality Policy reflects the direction the organization wishes to follow.

CODE Development Group specializes in the development and operation of Free Trade Zones, offering modern and innovative space and service solutions for our clients.

We have a team of professionals dedicated to executing efficient management processes in design and construction, ensuring the success of our projects.

With the **Quality Management System**, we promote the continuous improvement of processes and customer satisfaction. For example, in the 2023 period, we renewed the process map that can be seen in the attached image and created a quality plan through which we integrate the guidelines of the Project Management Office (PMO), a project management tool that allows us to work in cooperation with the rest of the department leaders, especially with those of Construction Quality, Health and Occupational Safety, Environment and Management Systems (EHS), Preconstruction, and the Quality Management System.

Process Map STRATEGIC Quality Management System **VALUE CHAIN** Act of **Final Delivery Blueprint** Project Management (Evolution, CODE, ZFC) Client **Feedback Technical Specifications SUPPORT** Accounting **Facilities Financial** Support Organizational Management Management Management Development

Within this operational framework, we maintain the ISO 9001:2015 certification focused on Construction Project Management. This system has been fundamental for a long time in helping us standardize our services and construction quality. It ensures that our methodologies and regulatory compliance are adequate. Additionally, it favors cost reduction by optimizing the entire supply cycle and procurement processes.

Two primary precepts derive from the Quality Management System:

Quality Objective 1

Ensure **compliance** with customer requirements related to time, cost, and safety in construction projects.

Quality Objective 2

Ensure customer satisfaction through the continuous improvement of our processes.

Guaranteed Construction

To strengthen the quality assurance system in construction projects in 2023, we implemented the quality module of the **Procore™** tool for the first time. This software, specifically designed for the sector, acts as a collaborative center among owners, general contractors, specialized contractors, and other employees throughout the project's life cycle.

This tool **facilitates inspection** and achieves the unification, standardization, and real-time distribution of information to all involved. It also generates data and statistics on the quality management of the projects. Throughout 2023, several projects were included, covering the square meters for the shell (main structure and basic infrastructure of the building) and their improvements in each case. The goal was to gather all observations and manage them efficiently.

It is important to mention that in stages such as earthwork, already completed as in the case of Shockwave Phase 2, the use of the tool allowed the recording of vital information for the advanced project.

With this new vision of quality and project monitoring, it was possible to improve and strengthen relationships with clients such as Shockwave and Moog. In fact, Moog recognized the Coyol Free Zone project team in its internal Town Hall for the excellence of the service received.







Project	m²	Total Observa Addressed Ti
Moog Phase 2 —	— 5 915 m² —	398
Multitenant 2 & 3	— 11401,35 m	1² 426
Shockwave Phase 1	— 6880 m² —	343
Shockwave Phase 2	— 6394 m² —	266
Alleima —	— 94 m² ——	14



38

Digitization Quarry

Without a doubt, reading the environment and the needs of the market we serve has boosted the automation of processes in which we have participated for many years.

The adoption of tools such as Procore™ and the Park Management Information System, among other technologies, reflects our constant update and migration towards more advanced solutions.

In 2023, several projects aimed at advancing our commitment to digital transformation were carried out. One of the main benefits obtained was the ability to send invoices to the Condominium clients promptly and reduce cash use and the associated risks thanks to the Ride Coyol ticket system. Some relevant projects include:

- Automation of sales and purchase reconciliation: Facilitates the preparation of the Value Added Tax Declaration.
- Digitization of the invoicing process: The invoicing process for the Free Trade Zone Condominium clients was fully digitized.
- Automation in the reception of invoices:

Automated process for receiving invoices and sending them to the responsible area.

- Digitization of accounting registration and billing: Implementation of digitization for accounting registration and billing of ticket sales payments for the use of Coyol Free Zone buses (Ride Coyol).
- •Implementation of QR codes: QR codes were introduced to control Ride Coyol service users.

Regarding the **accounting system**, times have been reduced through the use of mass uploads to the system in both accounting and billing processes." Jimmy Mussio Finance and Operations Director **CODE Development Group**

With the start-up of Evolution Free Zone, we will continue advancing in our technological path. First, we will replicate the digital payment and user control system for the transportation services for park employees through **Ride Evolution**. Second, we will implement the Park Management Information System, which allows integrated control of electromechanical systems, fire systems, pumping systems, public area lighting, video surveillance, and access control.

Undoubtedly, 2023 marked a significant advance in our focus as a developer group increasingly committed to alobal technological innovations. These improvements have allowed increased process efficiency, agility, cost reduction, customer convenience, and minimized environmental impacts.

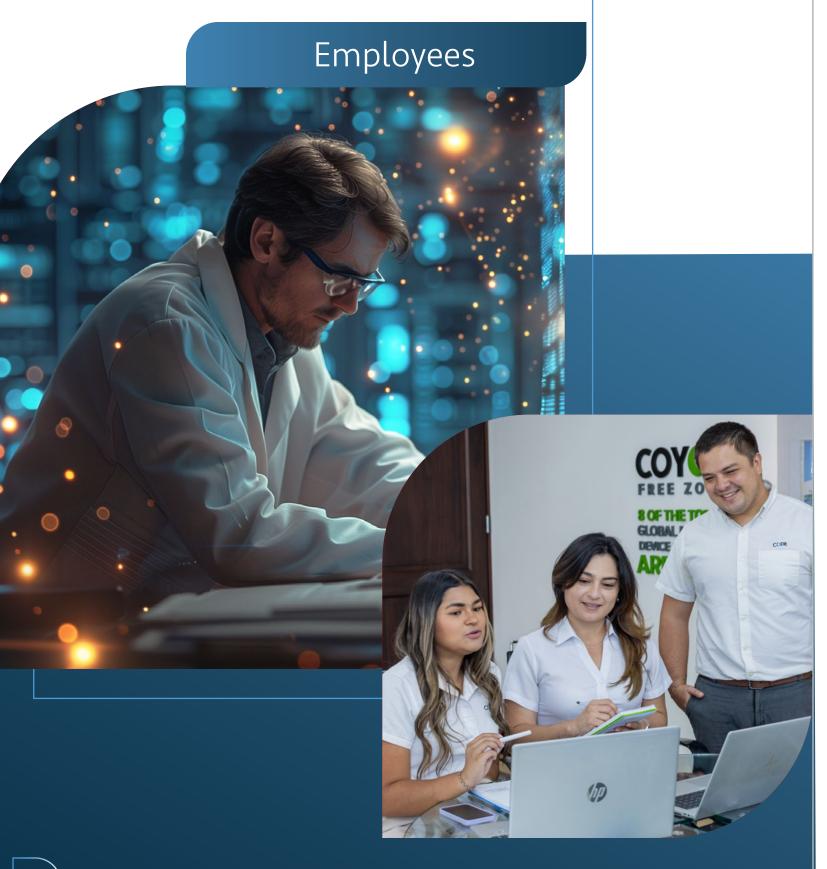
Relevant developments in this area include:

During 2023, we initiated three automation projects to be completed in 2024:

- Implementation of the construction budget management software Procore™: A connector is being developed in parallel to ensure the automated transfer of information to the accounting system.
- •Implementation of an artificial intelligence tool (Xtract): This tool is used for managing, receiving, reading, and digitizing invoices and will transmit the information to the accounting system.
- Installation of a Freshdesk ticketing **system for IT:** This system not only addresses technological problems based on severity, but also keeps a record of faults and user satisfaction regarding the attention received.
- Implementation of the OKR (Objectives and Key Results) methodology: With this methodology, we aim to streamline projects and better control them.







Human Capital: the Main Player in Development

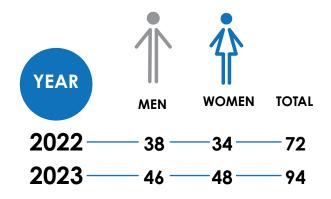
The sustained growth of our industrial parks is closely linked to hiring more human talent. This **increase in staff** allows us to efficiently and promptly meet the requirements of companies already based in the park and those in the process of starting operations. It also helps us achieve one of our corporate objectives: having increasingly specialized and resilient personnel in the face of foreign investment trends coming to the country.

At CODE Development Group, all employees enjoy a series of **benefits** that include medical services, transportation subsidies, medical coverage, work flexibility, access to a solidarity association, and professional growth programs.

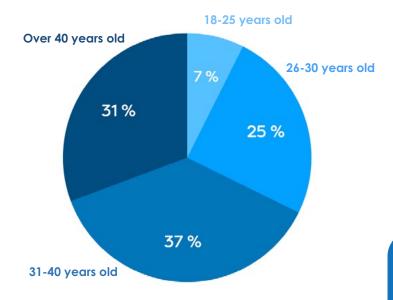
As of March 18, 2024, our human team in charge of managing the Evolution Free Zone and Coyol Free Zone parks has grown by 20 people compared to 2022.

Motivated by an internal vision of consolidating greater **gender equity**, the selection and recruitment processes have resulted in a slightly higher proportion of women, reaching 51.06% in 2023 compared to 45.94% of women in 2022.

Currently, our team consists of 94 people distributed as follows:



In 2023, the turnover rate in our team was 7%. Of the 94 total employees, 68% are between 31 and over 40 years old. Although employees between 18 and 25 years old are fewer, their presence is crucial to maintaining the **diversity** to which we always aspire in our staff composition.



Number of Employees 18-25 years old — 7 26-30 years old — 23 31-40 years old — 35 Over 40 years old — 29

Almost half of our employees live in the province where we operate. Many live in the cantons of Alajuela, Grecia, Sarchí, Naranjo, Palmares, and San Ramón. This is considered **positive** as we contribute to providing employment in the surrounding areas, prevent local talent from moving to other parts of the country, facilitate the commute of employees to and from their homes, and reduce the environmental impact of greenhouse gas emissions generated by transportation.

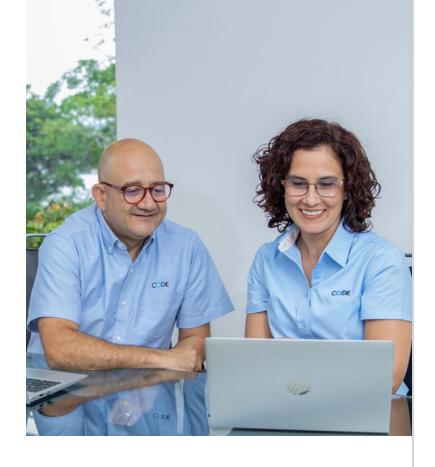


The nature of our business activity allows us to maintain a fairly heterogeneous mix of positions, suitable for the various functions required to meet our clients' needs.

In the two attached images, it can be seen how, compared to the 2022 period, we have **increased** the profiles of supervisors, coordinators, managers, and directors.

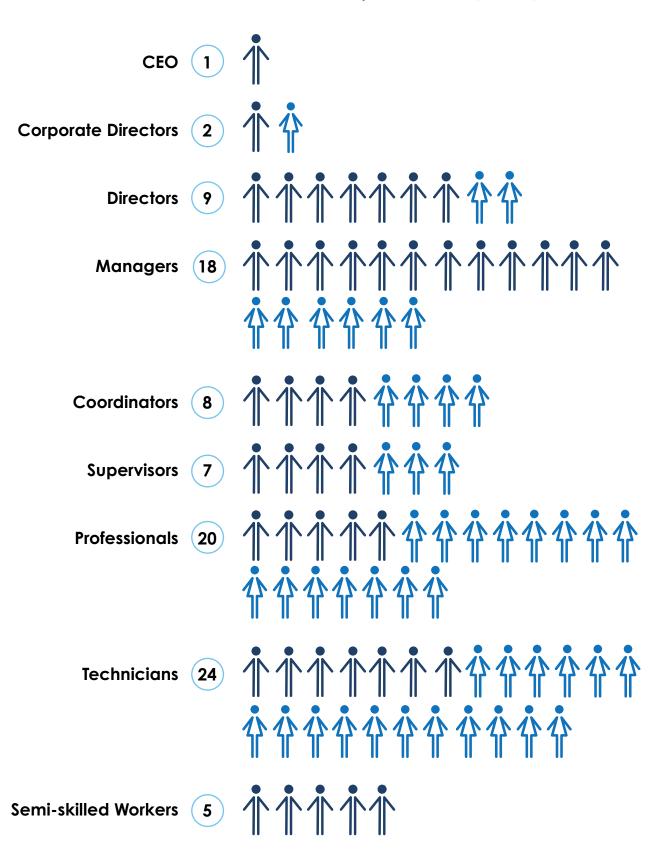
We also show with figures the constant effort we make year after year to **incorporate more women** into decision-making positions, advancing towards gender equity in our workforce.





POSITION	2022	2023
CEO -	1	1
Corporate Directors	2	2
Directors -	7	9
Managers -	13	18
Coordinators -	7	8
Supervisors -	5	7
Professionals -	15	20
Technicians -	19	24
Semi-skilled Workers	5	5

Number of Men and Women by Position (2023)



An essential component of all actions designed and directed towards the well-being of our employees is undoubtedly the work carried out by the

CODE Development Group Employees' Solidarity Association and related parties (Asecode). This association groups personnel from the companies:





COMPANY	PAYROLL	MEMBERS	% REPRESENTED IN ASSOCIATION
Zona Franca Coyol S.A	23	17	75 %
CODE Development Group S.A	35	28	—— 80 %
Coyol Desarrollo Comercial S.A	2	0	0
Condominio Horizontal Industrial Comercial con FFP Indv ZFC*	58	28	48 %
Caleco Free Zone	2	2	100 %
Evolution Free Zone S.A	32	23	 72 %
Total	152	98	 64 %

^{*}Condominium is included as part of Asecode, but not of CODE Development Group.

The primary purpose and benefit for the members of any solidarity association, including Asecode, is to promote savings and safeguard their severance pay. This means that in the event of resignation or dismissal without employer liability, the employee can withdraw their contribution.

Additionally, Asecode carries out several concrete actions to enrich efforts in the area of human capital:

• Harmonize labor-management relations:

Continuously improve the work environment and interactions between employees and management.

- **Promote savings:** Encourage employees to adopt a savings culture as a healthy financial practice.
- •Access to preferential rate loans: Facilitate access to loans with more favorable conditions than the general market.

- •Corporate agreements: Establish agreements with various companies in sectors such as health, recreation, education, and home to offer special discounts to members.
- •Recognition of dental expenses: Provide an annual specific amount to cover dental treatment expenses.

For 2023, Asecode achieved two major goals: **increasing** the organization's profits and **encouraging** the incorporation of new employees.

Additionally, a robust analysis was successfully developed to comply with Law 7786, that is, the Law on Narcotics, Psychotropic Substances, Unauthorized Use Drugs, Related Activities, Money Laundering, and Financing of Terrorism.

In Asecode, we work to generate a positive impact on our members by developing benefits that allow them to improve their living conditions and help each other through the collective solidarity of our colleagues."

Yuliana Araya Zamora
Employees' Solidarity Association CODE Development Group

We Take Care of Ourselves to Grow

Our **Wellness program** is conceived as a vehicle to improve the quality of life of CODE Development Group employees.

This program was initiated by Senior Management to offer conditions that enhance our team's capacity and satisfaction. To adapt the program to the specific needs and preferences of the personnel, a survey was conducted in June 2023.

The collected data is valuable and will serve as a basis for developing a comprehensive strategy that addresses the **physical**, **emotional**, **social**, **intellectual**, **and financial well-being of employees**.

66

Regarding the main results of the Wellness Program internally, we managed to increase the motivation and loyalty of employees due to actions aimed at caring for their overall well-being. Externally, it allowed CODE Development Group to be recognized as a good place to work."

Carla Castrillo

Organizational Development Manager
CODE Development Group

Thus, we structured a plan with its different areas to be carried out in 2023, as shown below.

FINANCIAL DIMENSION

- Design and implementation of the **Salary Policy** that contributed to achieving internal salary equity and competitiveness with the market.
- Signing an agreement with Banco Popular to improve **loan conditions**.
- **Personal Finance** Management talk.
- **Free benefits** for birthdays, marriage, birth of children, Mother's and Father's Day celebrations, totaling US\$8,800.

PHYSICAL (HEALTH) DIMENSION

- Contracting prepaid **medicine services** as a provider of prepaid medical services.

INTELLECTUAL DIMENSION

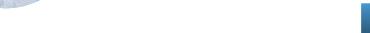
- Implementation of the **English language training program**, even when not required for the position.
- **Executive Coaching Program** to strengthen the personal leadership of key positions, enhance their skills, and positively inspire team members.

EMOTIONAL DIMENSION

- Hybrid work scheme (in-person/telework).

SOCIAL DIMENSION

- **Meeting spaces** with all staff to enhance social and work relationship strengthening: Mother's Day Celebration activity, combined with the presentation of the strategic plan and 2022 sustainability report
- Development of **team buildings**.
- Year-end **activity**.



Wellness has been designed as a phased and longterm program. The objective is that the needs and opportunities identified in the survey conducted with the team are integrated into a broader project, transforming them into timely plans with visible results.

To provide appropriate follow-up for 2024, the Organizational Development area has outlined four major health impact initiatives, described in the following paragraphs:

- Work Life Balance: Offer employees three personal days with pay per year, plus a day off on their birthday, to address personal matters during the workday. This helps balance their work and personal commitments.
- Medical Services: Promote physical and mental health care for employees through nutrition and psychological consultation spaces at the workplace and during working hours, facilitated through the prepaid medicine network.
- •Sports Communities: Encourage physical activity by forming sports communities. This includes payment or reimbursement for hiring sports services such as athletics, employing a coach for training, or a reimbursement of up to 25,000 colones per month for paying any other physical fitness service according to the preferences of each employee.
- •CODE Wellness Pills: Offer a one-hour virtual chat per month to address issues related to the dimensions of wellness.

Additionally, we maintain **medical office services** under a third-party contract, emergency care, and the health plan. For the medical office, the following benefits are provided to all staff:

- Medical Attention: Offers care for any type of ailment and/or illness, whether sudden or chronic.
- Medications: Provision of medications dispensed by the CCSS
- •Sick Leave: Issuance of medical sick leave if necessary.
- •Office Hours: Monday to Friday, from 7:20 a.m. to 3:40 p.m.
- •Locations: Offices in Centro Coyol and San Antonio de Belén.
- •Special Discounts: In specialist care, ultrasounds, X-rays, blood tests, and other services.

Additionally, the **emergency service provides** 24/7 coverage. When the service is required, the employee can follow the established procedure via phone, or request it through the application available on the emergency company's website.

With the prepaid medicine plan, it is possible to obtain discounts of up to 80% on tests and medical consultations, including X-rays, ultrasounds, and laboratory tests.

In 2023, the medical office reported 152 medical consultations, 109 more than the previous year.



Cases attended by the emergency service in 2023:



2022 2023 152

MEDICAL CONSULTATIONS CONDUCTED

Skills and Capabilities in Constant Dynamism

Aware of the essential role our human team plays in the success of our operations, we have developed a robust professional growth program for many years. This program includes training, talks, and other methods aimed at closing knowledge gaps and enhancing the capabilities and skills of each person who is part of this company.

The Organizational Development department has the necessary information to structure these plans according to the gaps identified by the different departments, and the capabilities that need improvement due to the nature of each position.

During the period covered by this report, courses, training, and other educational spaces were provided, covering a total of 27 topics, which are detailed below:

- Basic Aspects of Compensation
- Fiscal Benefits of the Free Trade Zone Regime
- Business Analytics: Making Decisions Based on Data
- Imports and Exports from the Free Trade Zone
- OKR Certification
- Market Practices and Hybrid Work talk
- Occupational Health of Contractors talk
- Integral Logistics in SEL ZF operational customs and new guidelines talk
- Human Talent Congress
- Challenging Conversations
- Culture of Integral Compliance in Free Zones
- Management of Complex Projects
- The DNA of Customer Service
- English
- Labor Legislation and Payroll Preparation
- Best Practices Control Book OP
- Franklin Covey Leadership
- Time and Priority Management
- Condominium Regulations

- Prepare for a Tax Audit Process by the Ministry of Finance
- Sanctioning Administrative Procedures in the RFZ
- Procedures and Tax Obligations for Companies within the Free Trade Zone Regime
- Zone Free Zone Manager Program
- Human Security in Buildings
- Intelligent Automation Technologies in Accounting and Financial Processes
- Treatment of Leases According to IFRS 16

The **investment in training** reached US\$51,900 in 2023, **59%** more than what was invested in 2022 when the figure was US\$32,494 (at the exchange rate of March 2024) or its equivalent in colones ¢16,344,814.

During 2023, 2,417 training hours were recorded, and as shown in the image, 40 different courses were provided with the participation of over 200 people.

A significant change compared to the previous 2022 report was the separation of the Administration and Marketing areas. For this report, the department's name was changed to "Marketing and New **Business Development."** Similarly, the Finance area expanded to include a new section called "Operations."

It is also important to note that within the variable of trained people, employees from the same department or directorate participated in more than one training.



TRAINING HOURS

	2022	2023
Administration —	24	142
Finance _ (now Finance and Operations)	1395,5	716
Engineering —	1082	1323
Marketing —	592	N/A
Grand Total _	3093,5	2417

NUMBER OF COURSES OFFERED

	2022	2023
Administration	1	5
Finance (now Finance and Operations)	15	19
Engineering	8	7
Marketing	15	N/A
Grand Total	39	40

TOTAL TRAINED PEOPLE

	2022	2023
Administration -	1	14
Finance _ (now Finance and Operations)	26	70
Engineering -	25	117
Marketing —	17	N/A
Grand Total _	69	222



Sustainability



Sustainable Development: a Cross-Cutting Task on our Agenda

At CODE Development Group, we are guided by a culture of triple impact, making decisions and executing tasks according to guidelines closely linked to the aspiration for local and global development.

This approach seeks to promote the well-being of people, the prosperity of inhabitants, and the conservation of natural resources for present and future generations. Talking about triple impact, we recognize the importance of a growing and thriving business, but we also focus on ensuring that economic benefits extend to our employees, communities, and environmental protection.

Our lines of action are aimed at **forming and maintaining** a virtuous ecosystem that not only includes quality employment and the attraction of high-caliber companies, but also productive chains based on local suppliers.

From the **economic and governance dimensions**, CODE Development Group is governed by a **supreme decision-making body** responsible for defining and supervising the fulfillment of the sustainability strategy and, therefore, approving the budget. This group participates in periodic materiality exercises to identify and prioritize issues relevant to the business, monitor the risks and potential impacts of operations or the environment, and oversee the proper execution of the work plan and the management of material issues.

To support these tasks, various directorates and coordinating areas participate in follow-up sessions. Additionally, an **External Corporate Social Responsibility Committee** for Coyol Free Zone companies held monthly meetings in 2023 with representatives from the park's companies to evaluate environmental and social projects, offer training, and study the feasibility of partnerships for joint initiatives.

This Committee, led by the sustainability coordinator of CODE Development Group and with a transversal character, involves the active participation of the entire organization in monitoring the goals and plans of the sustainability strategy.

In addition to alignment with all operational, administrative, and managerial teams, other actions such as training, internal communications, and regulations are integrated.

We carry out our business activities sustainably with the primary objective of generating a positive environmental, social, and economic impact for each of our stakeholders.

Prioritize, Listen, Measure, and Improve

In 2022, we conducted an exhaustive exercise to **identify**, **prioritize**, **and define a work plan** focused on relevant material issues. This study involved phases of documentary research, comparative analysis of real estate sector trends in environmental, social, and governance (ESG) criteria, alignment with Sustainable Development Goals (SDGs), and stakeholder consultations.

This process led to a **new Sustainability Strategy** and strategic plans that have been applied since then with a planned approach for the 2023-2027 period.

Based on the work carried out in 2022, the following material issues were identified:



- Climate Change Management
- Sustainable Construction
- Circular Economy
- Sustainable Mobility
- Biodiversity
- Internal Environmental Management

52

GOVERNANCE

- Ethics and compliance
- Innovation Management: promote and inspire
- Responsible linkages and supply chains
- Employability and Inclusion
- Management Systems



- Wellness
- Occupational Health and Safety
- Human Rights
- Human Talent Development
- Education and Formation
- Community Relations





We detail the **most important stakeholders**, which were fundamental for formulating the sustainability strategy we are currently developing:

Priority Stakeholders



















Global Call to Business Action

Our actions, strategies, and efforts align with a general framework of global commitments oriented towards sustainable development. For many years, we have been concerned and occupied with harmonizing business with the environment, continuously improving the well-being of our human capital and that of the companies based in our business parks. We also diligently address regulatory performance, the results of strategic alliances, and proper business conduct.

In the last six years, we have worked with the 2030 Agenda through programs and initiatives aimed at meeting indicators and goals for the nine **Sustainable Development Goals** that we have identified and prioritized.

To fulfill these indicators and goals around these nine global commitments, we execute the following actions:

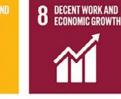


SUSTAINABLE GUALS DEVELOPMENT GUALS



























6 CLEAN WATER AND SANITATION

54

SDG 3: HEALTH AND WELL-BEING

Most of the companies that are part of our real estate developments are **dedicated to the Life Sciences industry**, **specifically medical devices**. Developing a business ecosystem around these industries has allowed us to host more than 30 companies that manufacture millions of medical devices annually in our industrial parks.

SDG 4: QUALITY EDUCATION

We focus on contributing to the **improvement of education in our area of influence through training, infrastructure improvements, and equipping educational centers.** This opens up specialized job market opportunities for young people interested in developing their careers in the Life Sciences field.

- SDG 6: CLEAN WATER AND SANITATION

 We support our commitment to conserving water resources for present and future generations through best practices for sustainable water use, treatment and reuse of wastewater, and reforestation in aquifer recharge zones.
- SDG 7: AFFORDABLE AND CLEAN ENERGY
 We promote good practices for access to sustainable energy through responsible consumption, generation of energy from renewable sources, and improvements for the conscious and responsible use of energy sources in construction, transportation, and commercial development processes.
- SDG 8: DECENT WORK AND ECONOMIC GROWTH

 By the end of 2023, Coyol Free Zone employed more than 23,000 people in the various companies in the park, while Evolution Free Zone created more than 500 construction jobs during the same period.
- SDG 9: INDUSTRY, INNOVATION, AND INFRASTRUCTURE
 We are dedicated to carrying out world-class construction projects with high international standards and innovative, sustainable designs, offering quality construction solutions that are environmentally friendly and resource-efficient.
- SDG 12: RESPONSIBLE CONSUMPTION AND PRODUCTION

 We seek efficiency in each of our processes and infrastructure stages, maximizing our positive actions and minimizing or eradicating negative ones to avoid impacting the environment or the surrounding community.
- SDG 15: LIFE ON LAND

 More than 19% of Coyol Free Zone's territory is dedicated to green or protected areas, and we have environmental initiatives such as reforestation campaigns, support for biological corridors, and biodiversity projects.
- SDG 17: PARTNERSHIPS FOR THE GOALS

 We establish ongoing and strategic alliances with **stakeholders**, such as academia, government, communities, and clients to join efforts to achieve common environmental, social, economic, and governance objectives, positively impacting our area of influence.

Executive Arm

As mentioned earlier, the goals and indicators in the three dimensions of sustainability are consolidated through robust strategic and business planning carried out by the Steering Committee, the highest authority within CODE Development Group's organizational structure. Following in hierarchical order are the Steering Committee, Management, and the departments subordinate to them.

The Steering Committee comprises three partners with full autonomy in strategic decision-making: Carlos Wong, Jorge Monge, and Álvaro Carballo, the latter being the Chairman of the Committee. Additionally, external members include Roberto Truque, Marielena Carballo, and Alejandro Monge.

The duties of the Committee are extensive and include strategy design, compliance supervision, budget control, and performance indicator evaluation. This also encompasses identifying and planning the reduction or mitigation of risks and impacts. Each management presents periodic reports to the Steering Committee for review, control, and necessary adjustments.

The role of the Managing Director is crucial, as the Steering Committee has delegated to this person the responsibility for planning and executing the strategic operational plan. The Managing Director is also responsible for monitoring business management and sustainability impacts. The Managing Director office feeds on the results presented by each department and its leaders, based on programs, initiatives, or projects carried out to reduce impacts and enhance the organization's strengths. With this information, the Steering Committee proposes new projects and continuous improvement.

The Managements are in a lower hierarchical level, including:



Finance and Operations



Engineering and **Projects**



Marketing and New Business Development



Compasses of Behavior

Since its inception, a crucial pillar for our organization has been maintaining **high ethical and business behavior standards.** To ensure proper compliance, we have several fronts.

First, we have an **Ethics Committee** composed of representatives of the Sterring Committee, Organizational Development, legal counsel, and the immediate department heads, activated only when a complaint case requires analysis and resolution. The essential duties of this Committee are to strengthen the **anti-corruption culture**, **educate on ethics**, and act as guardians of optimal respect for the Code of Conduct and Ethics.

The second front is the document itself, the Code of Conduct and Ethics, which contains key guidelines on preventing, handling, and resolving possible cases of non-compliance. It defines the duties of those subject to its adherence and describes procedures for remedying cases of violations or breaches.

This document is directed at employees, shareholders, managers, and directors, and also extends to suppliers and business partners of the organization.

The Code of Ethics and Conduct of CODE Development Group covers the following key aspects:

Conflicts of Interest

Regulates situations involving family members, external business activities, purchases of products or services from family members, information handling, and hiring with family ties. It includes specific policies for handling gifts received from business partners.

Use of Computers and Technological Resources

Establishes regulations on using corporate information, e-mails, and limitations on browsing and sharing prohibited content.

Information Security

Protects and restricts the sharing or misuse of company ideas, plans, strategies, or projects. It covers confidential information and social media use, ensuring customer information is protected through strict internal guidelines.

Anti-bribery Policy

Prohibits any payment or act of bribery applicable to employees, consultants, contractors, and anyone acting on behalf of the company.

Communication and Advertising

Provides clear guidelines on how communications related to the company should be carried out, regulating advertising material and necessary authorizations.

Human Rights and Labor Rights

Details the company's commitment to complying with universal frameworks and national laws, describing discriminatory, exclusionary, or work practices rejected by the organization, and promoted practices for a respectful, safe, and inclusive work environment.

Gender Equity

Expresses the commitment to gender equality and equity and the associated objectives.

Additionally, we have the "Policy Against Sexual Harassment" and the "Policy for the Prevention and Sanction of Discriminatory Conducts," which, like the Code of Ethics, include specific procedures for the swift and effective handling of complaints.

As of the end of 2023, CODE Development Group reports no cases of non-compliance or violation, nor any fines associated with these regulatory frameworks.

Finally, we maintain a broad internal regulatory portfolio available on the CODE website, which includes forms for procedures related to vacations, employment certificates, salaries, and leaves with or without pay. We ensure continuous training, induction, and updating of personnel concerning this regulatory framework.



Handling of COVID-19 Cases and Variants (Policy) Payment of Disabilities (Policy) HEALTH Well-being (Policy) Procedure for Receiving/Delivering Documents and/or Use of Multifunctional Equipment **ADMINISTRATIVE** Resignation or Dismissal Reimbursement of Mileage Payment Leave Without Pay Payment for Cellular Telephone Service Internal Communication Custody of Assets and Information Management Confidentiality and Non-Use of Information Corporate Payments Request for Legal Documents Recruitment of Interns Telecommuting

Transportation Policy and Procedure

TRANSPORTATION

Payroll Deduction for Bus Service Use Authorization

Conduct and Ethics
Use of Uniform and Dress Code
Against Discrimination
Against Sexual Harassment

Arrival of Children
Marriage Leave
FAMILY
RELATIONS

Arrival of Children
Marriage Leave
Bereavement Leave
Paternity Leave

English Language Proficiency
TRAINING
Training Sessions

Environmental
SUSTAINABILITY Scrap Donation

58

At CODE Development Group, we foster **open and participatory communication** in all aspects related to the organization.

We address suggestions and concerns that people send through the Suggestion Box available on our website. When these suggestions are serious or critical, the relevant operational area communicates them to the Steering Committee for analysis and resolution.

All cases are treated **confidentially**. The communication channels available for customer service include:



Materializing Agreements

There is no more certain statement in the field of sustainability than the one highlighting **the power of alliances** to advance quickly and effectively in support of the groups and populations we have decided to help.

For many years, CODE Development Group has entered into agreements with various organizations to successfully carry out social, environmental, and community impact projects. Together with our counterparts, we strive to improve the quality of life of surrounding communities and young students, promote quality employment, and increase the well-being of our employees.

All these relationships are **exclusively oriented to the benefit of the communities** and are not associated or limited in any way to commercial goals or particular interests of the organization.

In the box attached hereto, you will find the list of organizations and entities with which we work in joint efforts.





Allied Entities



Costa Rican Coalition of Development Initiatives

Association of Free Trade Zone Companies in Costa Rica (Azofras)

Foreign Trade Promoter (Procomer)

Positive Horizon Association

(CINDE)

Association of Free Trade Zones of the Americas (AZFA)

Costa Rican Chamber of Construction (CCC)

Costa Rican-North American Chamber of Commerce (AmCham)

Costa Rica Institute of Technology (TEC)

National Technical University (UTN)

INCAE Business School

National Learning Institute (INA)

University of Costa Rica

LEAD University

Latin American University of Science and Technology (ULACIT)

Costa Rican-North American Cultural Center

Western Federation of Municipalities of Alajuela (Fedoma)

Medical Devices Cluster Costa Rica

Buen Trabajo CR



Municipalities:

Alajuela, Grecia, Sarchí, Naranjo, Palmares, San Ramón, Poás, Atenas, Belén, Santa Ana, Alajuelita, San Mateo, Santa Bárbara, Desamparados, Tibás

Ministries:

Public Education (MEP)

Foreign Trade (Comex)

Finance (MH)

Foreign Affairs and Worship (RREE),

Economy, Industry, and Commerce (MEIC)

Costa Rican Institute of Aqueducts and Sewers (AyA)

Costa Rican Electricity Institute (ICE)

We are in the process of formalizing alliances with **15 more municipalities** of cantons in the provinces of San José, Heredia, and Alajuela.

An Attraction Ticket for the Country

The criteria that encompass the 'Country Brand' program are naturally amalgamated with the values and foundations of our organization.

We have been part of this national initiative for almost 10 years, which guidelines to increase competitiveness, growth, and the reputation of the country are reflected day by day in the operations of our industrial parks.

We attract high-level Foreign Direct Investment while tenant companies recruit valuable talent for the industry, strengthening our country's recognition as a magnet for investments. We offer services and facilities that are cutting-edge, innovative, and highly technological.

In the first quarter of **2023**, we renewed the Country Brand license for Coyol Free Zone after meeting more than 100 indicators in the areas of **excellence**, **sustainability**, **innovation**, **social progress**, **and Costa Rican connection**.

This renewal, which will be maintained until 2028, reinforces our commitment to contribute to the country's competitiveness and position it internationally as a leader in Free Trade Zones and the attraction of foreign direct investment. For 2024, our task will be to continue the licensing process of the Country Brand for the **Evolution Free Zone park**.



Harvest of Good Work

Year after year, CODE Development Group is awarded for its **high performance** in various areas related to the management of its parks operated under the Free Trade Zone Regime. In addition to the innovation of its real estate developments and its leadership in the Life Sciences field, our organization is recognized as a **breeding ground for specialized human talent**, receiving awards in a constantly transitioning and revitalizing market.

In 2023, CODE Development Group was distinguished for its good practices in ESG (environmental, social, and governance) criteria. Additionally, our Managing Director Carlos Wong was honored by the newspaper El Financiero for his 30 years of work in Free Trade Zones and his impact on the national economy and local development of the communities near our parks.

The list of **recognitions** received in 2023 is below:



Recognitions Received in 2023







Highly Commended: Rising Star 2023

Honorable Mention: ESG Practices





Businessman of the Year 2023 – Carlos Wong

Positively Impacting Social, Environmental, and Economic Areas

The **triple impact approach** gives our sustainability strategy a level of mature and long-term integration and interpenetration. Ignoring the environmental effects on populations near a project, or designing a community program without an adequate budget or strategic allies, overlooks the holistic and synergistic nature of sustainability.

This approach is the foundation that guides our work plan in the social, environmental, and economic-governance dimensions. We strive to positively impact our stakeholders, especially local communities, and maximize the benefits obtained.

In each idea, project, or program, we aim for results that harmonize the three sustainable axes with **business objectives:** supporting the economic growth of the country, attracting high-value foreign investment, promoting quality employment, improving people's quality of life, protecting natural resources, and employing cutting-edge technology to be more efficient and environmentally friendly.

In the following paragraphs, we will detail the **positive impact** generated by the operations of the parks under the CODE brand.



Economic Dimension

44% of Medical Device Exports Come from Coyol Free Zone

In a world still recovering from the crisis caused by Covid-19, 2022 was marked by notable economic expansion, but also a slowdown in certain regions where growth rates were lower than those of 2021.

During this period, high inflation rates and stricter monetary policies were observed, as well as a decrease in Foreign Direct Investment (FDI) as a percentage of Gross Domestic Product (GDP), which fell from 22% in 2021 to 17% in 2022. However, in Latin America and the Caribbean, FDI showed signs of recovery, increasing from 23% of GDP in 2020 to 36% in 2022. In this context, Costa Rica's economy was characterized by a **dynamic of recovery with deceleration**, according to a study conducted for Coyol Free Zone by the firm DRP Trejos & Cornick.

Despite a restrictive monetary policy environment and a constant decline in the exchange rate, the country's exports demonstrated their usual robustness, growing almost three times faster than total GDP: 122% versus 43%.

The study also highlights the ability of Costa Rica to continue **attracting foreign investment**, including high reinvestment rates from companies located in business parks. As a result, exports from the Free Trade Zone Regime accounted for more than 60% of the country's total goods exports in 2022.

In particular, exports from the medical device cluster continued their upward trend. While in 2015 they represented 25% of goods exports, by 2022 they reached 40%, with a value of nearly US\$6 billion in this last period.

Between 2015 and 2022, Foreign Direct Investment (FDI) flows represented between 556% and 338% of GDP.

In 2022, **medical device exports** reached a value of **US\$5.9 billion**, while the country's total goods exports amounted to US\$10.7 billion.

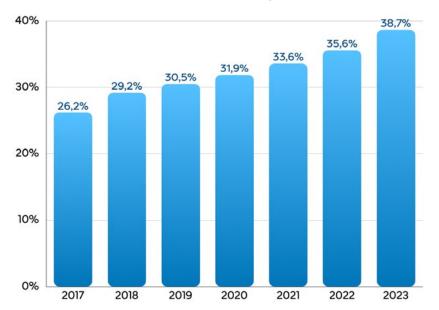
It is crucial to highlight two additional aspects of Foreign Direct Investment in the country. First, the importance of the Free Trade Zone Regime in the Costa Rican labor market is significant, not only because of the amount of employment it generates, but also because of the quality of these jobs in terms of wages.

At the end of 2021, 164,212 direct jobs were counted, according to data from the Foreign Trade Promoter (Procomer). A second relevant aspect is the influence on the productive chain, evidenced by the annual purchases of goods and services. At the end of 2021, domestic purchases reached US\$5.397 billion.

In 2022, almost 62% of total jobs created in the Free Trade Zone Regime came from the service export sector.

> Between 2017 and 2021, domestic purchases of goods and services made by companies in Free Trade Zones experienced a **growth** of 200%.

Participation of **Medical Devices** in Total Goods Exports



In the context of **economic recovery and expansion** where Foreign Direct Investment (FDI) plays a crucial role, Coyol Free Zone, a business park of CODE Development Group with 17 years of experience, stands out. Recent study data show that in 2022, Coyol Free Zone exports represented more than **30% of total goods exports** from the manufacturing segment of companies located in Free Trade Zones.

"The added value of these exports is consistently around 60% of the total export value, reaching 63.4% in 2021," notes the study.

Coyol Free Zone, an industrial park that mainly houses companies in the Life Sciences sector, has demonstrated its relevance in exports.

For 2022, almost **44% of Costa Rica's medical device exports came from this park**. Additionally, its contribution to employment is equally notable, with a 3700% growth between 2019 and 2021.

Between 2017 and 2021, direct employment in Coyol Free Zone experienced a growth of 245%, representing almost 9% of total employment in Free Trade Zones.

More than 50% of employees at Coyol Free Zone are women

Free Trade Zones are a crucial engine of **social and economic development** in Costa Rica, and the following data confirm it:



They contribute 15.2% to the country's Gross Domestic Product (GDP) and represent **57% of total exports.**



Employment

They generate **164,000 direct jobs** and about 57,000 indirect jobs. 44% of the positions are occupied by women, significantly helping to reduce the gender gap in the labor market.



Social Impact

They contribute more than **US\$1.064 billion** annually to social institutions such as the Costa Rican Social Security Fund (CCSS), the Family Allocations Fund (FODESAF), the National Insurance Institute (INS), and the Mixed Institute of Social Assistance (IMAS).



Leadership and Training

The **412 companies** located in the 52 Free Trade Zone parks are leaders in their respective sectors and play a crucial role in knowledge transfer and technical training development.







Sustainability



Technological Innovation -



Training and Al

Free Trade Zones are pioneers in complying with the United Nations Sustainable Development Goals, emphasizing sustainability as a **fundamental axis in their value chain.**

They use **advanced technologies** to measure and analyze impacts, facilitating the development of more effective initiatives. Tools such as the Internet of Things and data analysis optimize operational processes and reduce inefficiencies in supply chains.

Immersive technology allows training in complex processes from anywhere, while artificial intelligence enhances human capacity to solve from daily tasks to major global challenges.



Costa Rica stands out as a **preferred destination** for large companies due to the high value of its human talent and its constant pursuit of innovation. Free Trade Zones are oriented to generate a better quality of life, promoting improvements in human development indices, and focusing on sustainability, technological innovation, and human talent for the next generations.

Environmental DimensionOptimization and Efficiency

One of our priorities is the **protection of the environment**, especially in the face of the current severe environmental crisis caused by climate change. We are committed to taking decisive action.

In response to this situation, we have deepened our corporate vision to increase resource use efficiency, reduce our footprint in water consumption, energy, waste, and other materials.

We are integrating **innovation**, **technology**, **and data analysis** into our programs to streamline response times and improve the performance of resulting products, especially in the construction and maintenance of works and buildings.

Our "Environmental Commitments Declaration" aligns with this approach, ensuring full compliance with Costa Rican environmental legislation and promoting projects that not only meet legal standards, but also exceed them and have a broader impact.

Furthermore, we maintain a **constant focus on the entire life cycle of products and processes.** We show the environmental results of the activities developed by Evolution Free Zone during its construction phase, as well as those of Coyol Free Zone.

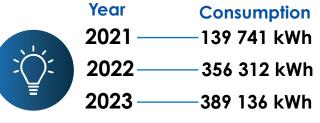


Energy Consumption

The data on **electricity consumption** that we present corresponds to the billing generated by CODE Development Group. This includes the Administrative Offices of Coyol Free Zone, the Administrative Offices of CODE, and the construction projects of both parks.

These totals cover the period from January to December 2023, as shown in the attached image.

Electricity Consumption in kilowatt-hour (kWh)



% Change: +921%

The increase in electricity consumption observed in 2023 compared to 2022 is attributed to several factors. First, consumption data from the Engineering of Evolution Free Zone and the Administrative Offices of CODE Development Group were included.

Additionally, the increase is due to the incorporation of new employees in response to the development of the new park, which naturally led to higher electricity consumption.



Maximizing Water

The search for **efficiency**, **savings**, **and optimization of water** has been a key focus in our industrial parks, particularly in Coyol Free Zone. Over the years, we have implemented substantial improvements for comprehensive resource management. We are supplied through four well concessions and the supply of the company Acueductos y Alcantarillados.

During 2023, we made **significant changes** in irrigation systems, replacing sprinkler systems with drip systems to save water, committing not to use potable water for irrigation. For the summer of 2023-2024, we managed to irrigate using **exclusively reused water** from our treatment plant and ditches, resulting in 100% of irrigation being done with recycled water.

Additionally, we replaced propeller irrigation meters in companies with ultrasonic mechanisms, improving measurement accuracy and facilitating leak detection in various sections of the complex. Water consumption in 2023 was 723,718 m³, representing a 15.78% increase compared to 2022.

Water Consumption (m³)

(Coyol Free Zone S.A. and Park companies)

	YEAR	Consumption
	2020 -	521 926 m³
***	2021 -	311 217 m³
	2022 -	609 458 m³
	2023 -	723 718 m³

The increase in water consumption from 2021 to 2022 was mainly due to the operation of new companies and the expansion of buildings for existing tenants, which led to an increase in personnel in manufacturing plants.

In Coyol Free Zone, wastewater management is carried out through our treatment plant, covering all companies located in the Park. All waters, both from buildings in operation and those under construction, are channeled through a network of pipes to our sewer system and directed to the

Wastewater Treatment Plant (PTAR) for processing. To maximize water reuse, in addition to daily readings and faucet regulation to control flows, we have installed aerators on all sinks, urinals, and toilets with dual flush systems, improving water use efficiency.

We describe the behavior of treated waters in Coyol Free Zone over the past four years:

Year	Daily Treated Wastewater	Annual Treated WateR
2020 —	——1 278 m³—	— 466 470 m³
2021 —	—1 300 m³—	— 474 500 m³
2022 —	—— 968 m³—	—353 472 m³
2023 —	— 1 710 m³—	— 624 296 m³

Of the total treated water, 624,296 m³ were reused; 50,831.89 m³ for green area irrigation.





The PTAR has a sludge drying system using a press that ensures drying quality with less than 70% humidity. Coyol Free Zone has executed a contract with Gaia, through which the latter administers, supervises, and performs preventive maintenance of PTAR equipment, with the help of a technician who verifies and ensures its proper operation.

Additionally, Gaia is responsible for sludge collection and providing appropriate treatment until final disposal. Data for the period 2020-2024 can be found in the attached image.

Year	Monthly Sludge Amount	Humidity	Annual Sludge Amount
2020 -	— 44 T —	<u> </u>	—— 528 T
2021 -	— 67 Т <i>—</i>	— 70 % –	—— 804 T
2022 -	57 T	<u> </u>	—— 685 T
2023 -	— 83 Т	— 70 % –	— 998 Т

The system has the capacity to handle larger volumes of sludge as new companies join the park, thereby increasing the amount of wastewater generated.

In the Wastewater Treatment Plant (PTAR), several key stages are carried out, described below:





Wastewater arrives at the PTAR by gravity.



Before entering the equalization tank, waters pass through screens that physically remove larger debris.



From the equalization tank, waters flow through a rotary screen that removes solids larger than 5 millimeters, then are divided into two different systems.



Stage 3 — → Stage 4

In the first system, the water enters a primary Dissolved **Air Flotation** (DAF) device that removes up to 65% of the Chemical Oxygen Demand (COD) and almost 100% of fats.



effluent.

The water is directed to an **aeration biological reactor** that reduces the organic load and then passes through a second DAF that separates secondary sludge and clarifies the water deposited in the



In the second system, the water is conducted to an activated

sludge tank containing a Fixed **Bed Bioreactor** for **biological** treatment.



Finally, the waters pass to a clarifier where the sludge is separated and returned to the reactor, and the treated water is sent to the final discharge.

70

Utilization of Materials

The scale of a park like Evolution Free Zone involves **complex management** of waste generated by each of the construction projects carried out.

For example, **earthwork** involved the efficient management of 109,358.56 cubic meters of reusable material that was removed and transported to other areas of the property where it was needed. In addition to earth material, other valuable materials such as plastic, wood, metal, and debris were managed.

This management is carried out following both internal procedures and a rigorous national policy aimed at maximizing resource reuse and minimizing the amount of material ending up in landfills. This cycle of compliance, initially perfected in Coyol Free Zone, is expected to expand significantly in the coming years as the new park evolves.

For proper co-processing or recycling, we rely on the Integral Solid Waste Management Law (Law No. 8839) and collaborate with authorized managers by the Ministry of Health.

Most waste comes from **construction projects**, and the Engineering Department is directly responsible for optimal management. We present the behavior of various valuable and non-valuable wastes in the years 2021, 2022, and 2023.

It is important to note that earth and organic components were incorporated into the waste registry starting in 2023.

Material Management by Type of Waste







72

LEED Certification

Coyol Free Zone has nearly 100,000 square meters of buildings constructed under LEED standards (Leadership in Energy and Environmental Design). These international standards are adopted by the construction sector to improve design practices, the construction process, and the management of generated waste.

The tenant companies in the business park not only advance in their manufacturing processes but also adopt green policies regarding their plants and properties. They follow criteria of energy efficiency, water management, use of alternative energies, indoor environmental quality, material selection, and waste management during and after construction.

We list the companies with LEED certifications in the Park:









Buil	ding
(com	pany)

Building (company)	Area	Certification
Abbot B31	14 300	Silver
Smith & Nephew B32	22 524	Silver
Establishment Labs B25	2500	Gold
Medtronic B7	4369	Platinum
Coopervision B53.2	10 817	Gold
CooperSurgical B49	7148	Silver
Smith & Nephew B32.1	5555	Silver
Bayer	21 123	Silver
Establishment Labs B23	7952	Platinum (in process of obtaining)

Total Area 96 288







Parallel to these certifications, by internal policy, we follow the best-known construction practices to ensure the organization's quality and sustainable focus.



•Use of more efficient construction materials to optimize the building's operational savings.



•Strengthening the collection and comprehensive management of construction waste, including the separation of valuable materials for reuse and minimizing the amount sent to landfills.



•The use of **insulated roofs and enclosures**, as well as window systems that reflect UV rays to maximize the use of natural light, do mitigate the harmful effects of UV rays, and maintain a comfortable indoor environment.



•Implementation of **light pavements** to reduce the heat island effect.



• Landscaping proposals using native species, thus improving the aesthetics of the facilities.



•Incorporation of systems for rainwater reuse, reducing potable water consumption and ensuring 100% wastewater treatment.



•Use of high-efficiency energy equipment for space acclimatization, reducing electricity consumption for cooling, heating, and lighting in park buildings.

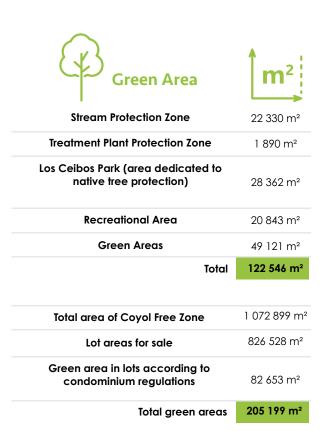
Natural Framework

About 11% of Coyol Free Zone, equivalent to approximately 122,546 m², is designated as green areas at the condominium level. Added to this are 82,653 m² of green areas provided by all the Park's affiliates, totaling 205,199 m² or 19% of the complex.

According to **internal regulations**, each affiliate property must reserve 10% of its land for green areas. Within this vision of CODE Development Group to promote the reforestation of internal areas and repopulate forests in external areas, connecting them with biological corridors or sites of natural importance, the selection and monitoring of native trees and plants play a crucial role.

These practices not only help protect water resources and conserve native species, but also provide a fresh and healthy environment for tenants and workers.

Green Areas FREE ZONE in square meters



El Achiote Biological Corridor

Replicating the success achieved in Coyol Free Zone, where more than 100 trees are added each year to the El Coyol Biological Corridor, CODE Development Group aims for its new business park, Evolution Free Zone, to also stand out for the conservation of water and forest resources.

In June 2023, to celebrate **Arbor Day**, CODE staff, future Evolution Free Zone operators, students from nearby educational centers, community members, and environmental organizations participated in the **planting of 350 trees**. This event marks the beginning of a tradition that has allowed Coyol Free Zone to develop a mature reforestation program, featuring species aged up to 300 and 500 years.

In Grecia, the planting program will help enrich the El Achiote Interurban Biological Corridor, which traverses the districts of Puente de Piedra, San José, San Roque, San Isidro, and Tacares, as well as part of the San Juan district in the canton of Poás. The objective is to foster biodiversity connectivity in harmony with the environment and avoid habitat fragmentation for local flora and fauna through education, projects, and establishing partnerships with public and private organizations.



At CODE Development Group, we conduct an annual campaign for the collection of special waste in our offices, contributing to the proper co-processing or final disposal of materials such as electronic equipment, white goods, and fluorescents, among others.

In 2023, the campaign resulted in the collection of over 100 kilograms of special waste, which were delivered to a manager authorized by the Ministry of Health for proper treatment and disposal.

Additionally, in the environmental field, we collaborate with the Foundation for the Development of Ecology and the Environment of the Potreros de PUAX (Fundema) in various initiatives, including a camera trap project. This project aims to identify mammal wildlife corridors in the Western Region and provide crucial data for decision-making in wildlife conservation projects.

The videos obtained have provided detailed information on focal points and species present in the area, which is essential for developing future conservation projects in collaboration with other institutions.







Towards Low Emission Mobility

Two important programs have been fundamental in achieving our **low-emission mobility goals**, benefiting hundreds of employees of the companies located in our parks who use the transportation service provided to and from their workplaces.

The first emission reduction initiative made significant progress in 2023 when we began the negotiation process to change the bus fleet. Our goal for 2024 is to increase the number of units with less polluting engines.

Additionally, as part of the emission reduction and carbon neutrality plan, we have agreed with a public entity to loan three zero-emission units to conduct tests and evaluate their impact on decarbonization and time efficiency within the Ride Coyol program.

Each year, we increase the number of buses equipped with Euro technology in compliance with Euro regulations 2, 3, 4, and 5 of the European Union.

These regulations, in effect since 1992, set **emission limits** for gasoline and diesel engines. The higher the regulation number, the stricter the limits for gases such as carbon monoxide (CO), hydrocarbons (HC), and nitrogen oxide (NOx).

In an effort to move towards more sustainable mechanisms, we **eliminated in 2023 the use of NFC cards**, which, although reusable, required materials with polluting components. Now we have a fully digital tool that allows passengers to **pay directly from their mobile phones**.

This transportation system is planned to be replicated in Evolution Free Zone under the name Ride Evolution, and is ready to start operations alongside the opening of the new park. The goal is to manage an intelligent transportation platform and achieve net-zero carbon emissions in the short term. It is expected that the service will begin to operate aligned with the opening of the first manufacturing plant in the second half of 2024.

The initial strategies include a hybrid proposal with a zero-emission combustion electric transport unit managed by Ride Evolution and expansion plans for the following year.

Route mapping has already been conducted to optimize future routes and surpass the results achieved by Ride Coyol, seeking a high socioeconomic impact for the population and employing companies with greater availability and safety.

Of the 184 buses providing transportation service, 87 are equipped with technologies that comply with Euro regulations.

Regarding the second program, let us remember that the Ride Coyol platform was launched in 2021 with the vision of transforming it into a **sustainable transportation service for the companies in our parks.** Since then, we have implemented various actions to minimize its negative environmental, social, and health impacts.

Additionally, we have centralized the management of internal transportation through a robust digital infrastructure that allows us to control, document, and track each service user, along with a digitized system for ticket payment and control.



At CODE Development Group, we are very proud to have maintained a crucial social benefit for three continuous years: direct and safe transportation for all employees working at Coyol Free Zone. This service has significantly reduced travel times to their final destinations and will soon be extended to the new park in Grecia.

Since 2021, we have maintained a **zero-accident rate**, meaning no hospitalizations or emergency medical care have been required for personnel directly involved or benefited by this transportation network.

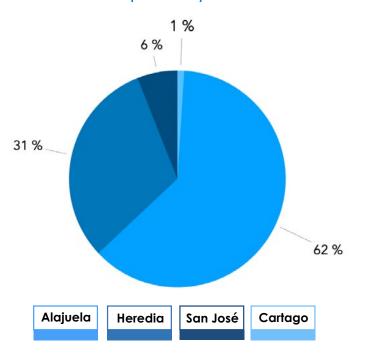
At the end of the period covered by this report, the transportation network registered an average of 590 daily services executed and distributed at various times and routes within the park, including common and private routes.

These services are distributed across the four provinces of the Greater Metropolitan Area:

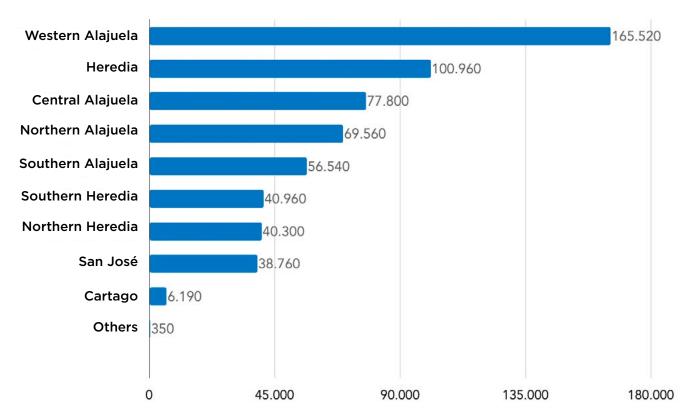
Alajuela, Heredia, San José and

Cartago, as illustrated in the graphics below.

Consumption by Province



Transactions by Region



78

It is normal for the number of monthly users of our transportation service to vary in relation to daily records due to factors such as telecommuting, the carpooling system, disabilities, personnel turnover, and the use of private vehicles.

Considering these variables, the network served just over 20,000 users during the month.

20 530 number of employees who were provided with the service during 2023

Highlighted results of Ride Coyol in 2023, thanks to an effectively executed action plan and a longterm vision:





Bus units with implemented electronic payment



3 592 824 Paper tickets saved



718 564,80

Sheets saved

5 tickets per letter-size sheet



14 371 296

Reams of paper saved



3 592,82

Tons of paper saved







Social Dimension

Contributions to Education. Health and Sports

With an investment exceeding ¢70 million (more than US\$140,000), CODE Development Group continues advancing its commitment to contributing to the well-being of people and the environment, as well as in the areas of education, health, and culture. These efforts are part of the essential pillars of our sustainability strategy.

Financial resources were allocated to various populations and groups near our operations, addressing needs that limit their integral development.

As in previous years, we have supported school infrastructure projects, sports activities, health initiatives, cultural events, and community beautification projects. We also continue to support environmental preservation.

All these contributions were made in collaboration with community and national organizations. ensuring adequate control, effective follow-up, and the desired positive impact.

In the attached documentation, we detail the results obtained during 2023 in the programs and initiatives in which we participated.

Educational Infrastructure

Evolution FREE

La Cataluña School, Grecia

In collaboration with AVNA (formerly known as Okay Industries) and the La Cataluña Education Board, a large storage space was built for the school. Additionally, a classroom previously used as a warehouse was repaired, returning it to educational use. Evolution Free Zone invested over \$2,000,000 in dining area equipment and infrastructure improvements, benefiting more than 180 students and teaching staff.

Silvestre Rojas School, Grecia

Responding to educational infrastructure needs, Evolution Free Zone contributed ¢5,220,000 for painting walls and ceilings, positively impacting over 430 students and teaching staff.

María Teresa Obregón School, Grecia

As part of our social management program, ¢5,220,000 was allocated for purchasing paint to completely renovate the educational center, benefiting 180 students and teaching staff.

Miguel Carballo School, Naranjo

This school in Naranjo de Alajuela needed infrastructure reinforcements. Evolution Free Zone and Coyol Free Zone joined the initiative, donating ¢500,000 and ¢2,300,000, respectively, from scrap recycling. This aid painted the entire school, benefiting over 40 students and teaching staff.

Educational Infrastructure



Cedes Don Bosco, San José

A total of ¢9,036,586.43 raised through registrations and sponsorships of the 2023 Coyol Classic was allocated to Cedes Don Bosco. This technical training center acquired advanced equipment for its workshops, including a 3D printer and a laser axle aligner, benefiting over 200 students.

ION Inclusive Magazine

In partnership with ION Inclusive Magazine, we have developed programs to educate on inclusion and intellectual disability, including talks and publications aimed at Covol Free Zone companies.

Vital Voices

We participated in the Vital Voices program, an NGO dedicated to women leadership and **empowerment.** This initiative seeks to improve opportunities and well-being for women in Costa Rica, contributing to their inclusion and equity.



Health, Sports, and Culture

Evolution FREE

Recreational MTB Race, Hacienda Trails, Grecia

For the second consecutive year, Evolution Free Zone participated in this night race, which featured over 1,300 cyclists. We contributed ¢1,000,000 to the Tacares community for **infrastructure projects.**

Benjamín Mayorga Children's Soccer School, Grecia

We supported this soccer school with the donation of **uniforms**, **balls**, **and other sports equipment**, benefiting over 50 boys and girls.

Concepción Naranjo Integral Development Association

In collaboration with this association, we contributed to improving the **community hall's infrastructure**, including rebuilding the sports field. Our contribution was $\not\in 1,000,000$.

Cultural Contribution

Throughout 2023, we supported various cultural initiatives in the Western Region, including sponsoring the participation of the **Zarcero Municipal Band** in the Rose Parade in the United States, and purchasing **instruments for the Eduardo Pinto School Band** in Tacares.

Health, Sports, and Culture



2023 Coyol Classic

The tenth edition of this sporting event raised \emptyset 9,036,586.43, which was used to **equip technical** specialties in high school centers, promoting STEM education in critical areas for the medical device industry.

Blood Donation

We conducted the second annual **Blood Donation Campaign** in collaboration with the National Blood Bank and companies in the Free Trade Zone, helping nearly **350 people**.

Health Fair

Organized for the first time at our facilities, this fair featured the medical office's collaboration, offering medical care and discounts on services and exams, and promoting healthy lifestyles.

Environmental Education

Evolution FREE ZONE

In collaboration with the National System of Protected Areas (SINAC), the Forest Reserve of Grecia, the Foundation for the Development of Ecology and the Environment of the Potreros de PUAX (Fundema), and several schools in the canton of Grecia, Evolution Free Zone actively participated in **promoting environmental education.** Workshops focused on biodiversity care and integrated solid waste management were organized, benefiting more than 100 students from the Eduardo Pinto, La Cataluña, Silvestre Rojas and María Teresa Obregón schools.



San Rafael Hospital of Alajuela

We donated an **electrocardiograph** valued at over ¢3,000,000.00 to the hospital's Emergency Service, benefiting a population of 670,000 users.

Breast Cancer

In collaboration with Establishment Labs, we commemorated Breast Cancer Prevention Month with an educational activity open to all park companies, highlighting the importance of **preventive medicine and personal assessments.** We also donated ultrasound and mammography packages to have raffles among female employees.

Employability Platform

Adding a new real estate project requires redirecting and innovating the entire **employability and training ecosystem**, aiming to offer new companies and the human capital that integrates them consistent conditions, services, and facilities.

As business park managers, one of our main strengths lies in **effectively responding to the talent needs** presented by companies when starting operations. This implies establishing alliances with training centers and activating our Job Bank, ensuring that companies have adequately qualified personnel with the necessary academic, technical, or professional training.

We explain below how this platform works:

In the Job Bank, candidates must register to learn about available positions in companies located in business parks.

Companies can access the **job bank online** and search for suitable profiles for operational, administrative, engineering, technical, financial, and service positions. They also have access to the résumé information and contact details of candidates exclusively for hiring purposes.

The platform allows the posting of job offers, internships, and professional practices.

How to register?

- 1. **Registration** of interested candidates who want to apply for vacant positions.
- 2. Entering of **ID**, **e-mail**, **password**, **and accepting the terms and conditions** of the job bank.
- 3. **Résumé information:** Contact details (phone, e-mail, and place of residence).

Education: Academic degree, free courses, technical knowledge, additional skills such as Office package management, and languages.

Work experience: Previous jobs, positions held, duration in those positions, among others.

- 4. Once the registration is completed, users can **apply** for available vacancies.
- 5. Users can **update their résumés and contact information** whenever they want. All information contained in the job bank is confidential and its use is protected by the privacy policy and terms of use.

We present the behavior of the Job Bank platform in the last **four years**:

Number of people registered with the CODE's Job Bank platform

YEAR 2020	18 640	19 044	TOTAL 37 684
2021	11 468	12 849	24 317
2022	13 056	15 198	28 254
2023	10 713	11 978	22 691

It is worth clarifying that the decrease observed from 2021 is due to the stability achieved by Coyol Free Zone as a business park, where the growth of companies and the volume of hires in 2023 were not as significant as in previous years. This will allow more organic and upward development in the coming years for the new park Evolution Free Zone, which is currently under development and preparing to host world-class companies.

In 2023, with the construction of the new park in full activity, the employability program expanded to cover the entire CODE company. This expansion included are newal of the image and the creation of a specific digital portal for each park or development, allowing people to access different websites for Coyol Free Zone, Evolution Free Zone, and another for CODE. You can check the adjustments made at the following link: **empleocode.com**.

The existence of three different portals facilitates the visualization of the diversity of vacancies and professional and labor profiles, not only technical or operational. Additionally, improvements were made in the platform's functionality, user experience, security, and terms and conditions. Like Coyol Free Zone, where the companies based therein have enjoyed the benefit of using the Gente Coyol platform for posting vacancies for free, Evolution Free Zone will have its own platform in 2024, called "Evoluciona". These sites will not only promote job positions, but also communicate other activities related to the community, employees, and the company.

82

Number of people hired from the CODE

Job Bank	•		
YEAR	1		TOTAL
2020	680	862	1 542
2021	285	465	750
2022	297	445	742
2023	308	463	771

We have redoubled efforts to ensure more local governments join actions that enhance job placement in their communities. Currently, we maintain active **agreements with 15 municipalities** and are in talks with several more. Additionally, the total number of people registered in the Job Bank, considering the years of service existence, amounts to 200,086.

Enhancing Internal Structures

Adding a second real estate development resulted in three decisive changes. First, regarding internal governance, the Recruitment and Agreements area was integrated into the Marketing and New Business Development Directorate, giving a more commercial and strategic approach to **talent attraction**.

This integration allows **early involvement** with clients interested in establishing themselves in the Free Trade Zones of the Groups, in addition to facilitating additional services, such as advising on hiring needs, organizing job fairs, and conducting turnover and benchmarking surveys.

Second, in 2023, another person was hired for the **Talent Attraction Executive** position, ensuring that the recruitment and selection area has executives specifically dedicated to each park. Finally, **support** is provided by external recruitment consultants to handle mass hiring processes, including preselection stages, interviews, scheduling, and candidate testing.

Spaces for Knowledge

As part of our philosophy of investing in crucial areas for the **country's development and growth**, we have been strengthening and expanding spaces dedicated to education and continuous learning.

This strategy aims to lay the foundation for the **quality employment** we always strive to offer. Coyol Free Zone has been fundamental in this process, functioning as a springboard for these educational projects. With the experience and learnings obtained in this park, we have been able to implement and boost these educational models in the new Evolution Free Zone with greater impetus.

Programs like **Coyol Te Prepara** and **Intégrate Coyol** have proven to be effective starting points for improving the skills, abilities, and aptitudes of participants, thus facilitating the availability of qualified personnel for tenant companies in the park.

In particular, a company that began operations in Coyol Free Zone in 2023 integrated the Intégrate Coyol initiative as part of its induction process.

This service allowed new manufacturing operators to travel to the parent company to receive specific training on the products manufactured at the Costa Rica plant.

We detail more aspects of these two initiatives below:



Coyol Te Prepara

This is an **education and training initiative** that supports people in improving their educational skills and paving the way for employment. This initiative includes the Manufacturing Operator Course, BachiCoyol, and a broad catalog of courses offered by the National Learning Institute (INA).

Intégrate a Coyol

This program aims to provide companies with optimal personnel from communities near the parks. To achieve this, we work closely with local governments. We offer training and courses to potential candidates for operator positions in manufacturing, specifically in medical industry areas and general aspects of the Free Trade Zone. At CODE Development Group, we design the curriculum of the courses tailored to the companies' requirements, considering the number of people to be hired and the areas from which it is possible to attract human talent. The offered programs are short-term, taking between 28 and 56 hours.

Flagship Programs

Four flagship initiatives in the field of internal training in the Free Trade Zones remained very active during 2023. These initiatives are led by Lumino and are: BachiCoyol, Manufacturing Operator Course, Dual Technical Education, and the National Learning Institute (INA) course catalog.

Regarding the first initiative, it is part of Coyol Te Prepara, a social education and training project designed to support people in improving their educational skills and obtaining employment. BachiCoyol make easier for employees of the companies, their families, and community members, to coordinate courses to complete their high school education. This is achieved in collaboration with the Castro Carazo University.

During the 2023 period, a total of 145 people accepted the challenge of enrolling in BachiCoyol, and 121 successfully completed the program.

Regarding the Manufacturing Operator Course, it is a virtual asynchronous training program that began in 2021 and is hosted on our job bank. This course is open to the public and free for those who wish to obtain employment as manufacturing operators in one of our associated companies.

Once participants complete the course and graduate, they become **part of a database** in the job bank available to companies looking to hire personnel.

The third program, **Dual Professional Technical Education**, aligns with the national regulatory framework that seeks to promote the teaching of technical careers from both educational institutions and companies. This allows students to access two training environments and acquire specific knowledge and skills according to industry demands. To ensure the program's proper operation, we follow the guidelines of the Costa Rican Association of Free Trade Zone Companies (Azofras), regarding coordination and seeking companies interested in participating in this educational proposal.

During 2023, a total of 1,642 people completed the course, and from that number, different park companies hired 297 new employees. Upon graduation, their names were added to the database, which now exceeds 12,000 people.



During 2023, nine students from the night section of the Professional Technical College of Atenas, who are studying Industrial Electronics, completed the second year of their career at Abbott Medical SMC Ltda and Coopervision. The program's completion and the graduation of this group of young people are scheduled for 2024.

Lastly, Lumino is also responsible for carrying out the agreement between CODE Development Group and the National Learning Institute (INA). INA provides training to employees of existing companies in Coyol Free Zone on various topics of interest to their different plants. Those interested in the academic offer can access the catalog through the Free Trade Zone website. This offer includes topics such as occupational health, quality control, production supervision, good manufacturing practices, computer tools, and customer service.

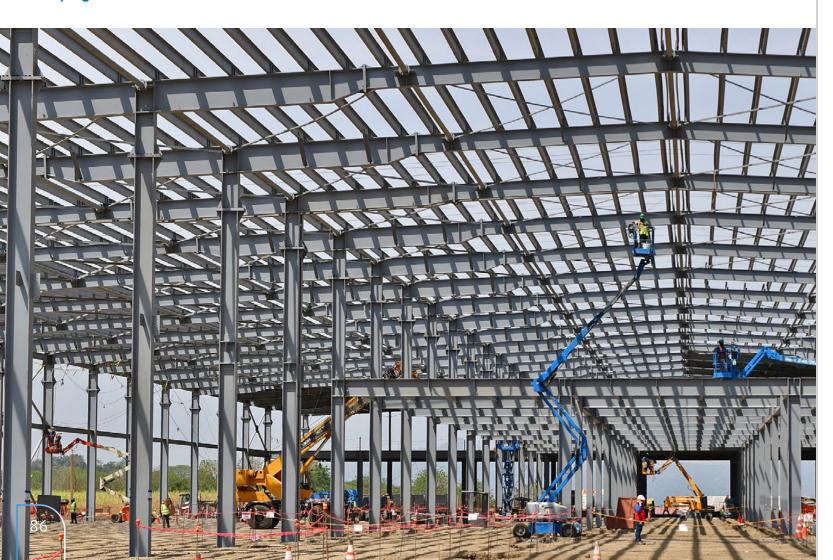
At the end of 2023, the course catalog accumulated more than 1,400 placements. Additionally, 79 people benefited from technical assistance to develop their fine motor skills, 27 employees received training in comprehensive trainer competencies, and 39 people obtained INA certifications in various programs.

Continuous Improvement of the Value Chain

Proper management of quality, timing, payments, sustainability, and other criteria associated with suppliers requires effective mechanisms and controls.

All products and services received from third parties must undergo processes of analysis, evaluation, and monitoring, to ensure the peace of mind and satisfaction of both parties.

In general terms, the attached image shows how the value chain works for CODE Development Group.





STEP 1

Definition of the profile of sectors and companies of interest for our projects



Proactive promotion to companies of interest.



Initial approach of a specialized team in investment attraction and other competent state authorities.



General offerina of business parks with facilities for establishing operations under the Free Trade Zone Regime.



STEP 5

Company decides to **settle** in a CODE Development Group's business park.



STEP 6

Actions by the companies to obtain operational and Free Trade Zone Regime permits.



Planning with CODE Development Group's multidisciplinary team for the construction of a turnkey project following the guidelines of the client.



Obtaining the necessary **permits** for the construction process.



STEP 9

Start of earthwork and the respective construction process.



STEP 10

Delivery of facilities to the company for equipment and consequent start of operations.



STEP 11

Provision of complementary services: recruitment and selection of labor profiles, induction processes and professional development, strategic linkage with production chains, coordination of public services, personnel transportation, and other

operations.

requirements for successful



STEP 12

Management to meet expansion, enlargement, or modernization needs of buildings of companies already based in the business park.



Once these plants are built or expanded, CODE Development Group hands over the property to the owning company and provides **complementary services**.

- Attraction and development of the best human talent.
- Recruitment processes.
- •Training tailored to the needs of the companies.
- Support in **project development** in sustainability topics.
- Assistance in **project preparation**.
- Modern digital payment system for employees' **transportation** from companies.

Supplier Directory

Part of the **Sustainability Strategic Plan** involves carrying out actions with a key component for the business: **the value chain**. In this regard, for several years, we have managed the Coyol Free Zone Supplier Directory in collaboration with the Costa Rican Foreign Trade Promoter (Procomer). This program evaluates suppliers of a wide range of products and services, seeking to establish business relationships with companies in Coyol Free Zone.

Currently, the portfolio includes more than **100 national suppliers** in the Coyol Free Zone Supplier Directory, and for the 2024 period, we plan to expand the scope to Evolution Free Zone and other real estate developments that will be under CODE's responsibility. Our goal is to significantly increase the number of suppliers registered in our product and service directory.

The nature of CODE Development Group's business encompasses suppliers in the **construction** field, as well as others that add value to the services we offer as a business park to companies based in the parks, including **recruitment**, **training**, **transportation**, **and security**.

All management begins through the supplier catalog, as companies wishing to sell services and products to our organization must meet the requirements and prerogatives in order to be part of said catalog. If not included, they must file an application, complete the required documentation, and be approved.

We always conduct a prior analysis before making purchases or hiring products, equipment, or services. For recruitment consultants and construction companies, this analysis is carried out through a preselection of suppliers and tender proceedings.

For services, the evaluation involves assessing offers, analyzing prices, supplier ratings, personnel competencies, and demonstrated track record in services provided.

Evaluation

The **degree of performance** of each supplier is crucial. Therefore, it is assessed to verify both the supplying company's condition and the quality of the received service according to established characteristics.

The **evaluation** is the responsibility of each requesting area or project. To ensure uniformity, the "Supplier Evaluation" form is used, categorized according to the type of product, equipment, or service acquired. This evaluation must be carried out before processing the final payment of the purchase.

The **rating** obtained will determine the making of said payment, always supported by evidence supporting the closing of the contract. For non-engineering-related projects, the evaluation is conducted for recurring suppliers on a semi-annual basis. The contractor is responsible for maintaining optimal control of compliance with this form.

The purpose of **supplier management** is to control costs, manage risks, and oversee supplier performance, all aimed at achieving established goals and objectives.

Additionally, as part of the internal procedure for purchasing imported equipment or products valued over US\$500,000, the requesting party (Engineering Department) is responsible for preparing a Purchase Award Note for Products or Equipment, and obtaining the appropriate signatures in the approval and formalization section of said procedure.

An Incentive for Business Partners

In the supplier field, we are proud to pioneer a program already in its second edition and aspiring for greater reach once Evolution Free Zone is fully operational. We refer to **Coyol Impulsa**. This award, launched in 2021, aims to promote and improve the competitive performance of local suppliers.

The initiative recognizes **national companies** that have successfully integrated into the value chains of multinational companies located in Coyol Free Zone.

These connections or chains directly impact competitiveness and productivity based on innovation, which are fundamental pillars for business growth, competition, job creation, and access to new markets.

Coyol Impulsa aims to publicly highlight Costa Rican companies that excel for their talent and understanding of multinational companies' requirements in aspects such as quality, delivery times, performance indicators, certifications, and sustainability.

In this second edition, we have:

39 participating companies

11 Coyol Free Zone companies nominated 16 suppliers.

22 completed the process.

15 finalists

Three key variables: **quality**, **sustainability**, **and complementary services** were evaluated and awarded by an external Technical Secretariat composed of Procomer, Bayer, and Cardinal Health.

The winners by category were the following Costa Rican companies:





Large Company —— Capris

Small Company — Fortech

Specialized Manufacturing — Artemisa

Special Processes ——Segex

Packaging — Etiprés

A new category was incorporated: **Non-Costa Rican Supplier located within Coyol Free Zone**, with
SMC Ltd. being the winner.

Additionally, **honorable mentions** were awarded to the following companies:

- **Grupo Vargas:** for exceptional commitment to implementing, maintaining, and continuously improving quality, environmental, and occupational safety management systems.
- Polirt: recognized as "Revelation Supplier."
- •Steris: for promoting excellence and impacting the Life Sciences industry with its leadership since arriving in Costa Rica.



Chapter 8



Technological development drives us to consider a future where we must adapt to still uncertain conditions.

At CODE Development Group, we do not stop at challenges; rather, we focus on emerging opportunities. For this reason, starting with our developments, we promote industrial and business parks equipped with the necessary conditions for the industry of the coming decades.

We are **committed to the potential of our country** and our talent to continue excelling, fostering the development of their skills and technical capacity to integrate into the jobs of tomorrow. We seek to leverage the resources that technology offers us in a world where artificial intelligence and automation will be disruptive forces that transform work into higher value-added processes and solutions with **greater impact**.

The environmental challenges we face reaffirm our commitment to being a key player in the effort of Costa Rica to be a global sustainability leader. We have significantly invested in **minimizing** the ecological impact of our developments, by implementing sustainable mobility solutions, clean energy generation, and comprehensive waste management, among other actions.

We are convinced of the **transformative effect** of the Free Trade Zone Regime. Through Coyol Free Zone, we currently generate more than **23,000 quality jobs**, and we anticipate that the Western Region will become a new growth hub for Costa Rica, with **20,000 future jobs**, thanks to Evolution Free Zone.

We are making decisive progress in completing the infrastructure of our first development stage and constructing industrial facilities for the six companies that have already confirmed their presence.

As a business conglomerate, we have a team of over 100 professionals engaged in making our vision of sustainable development a reality. Our employees, encompassing areas such as engineering, finance, human resources, marketing, and operations, are the core of our growth and innovation.

We will continue to advance with the best talent in the country, fostering a culture of excellence and commitment towards **a bright future**.











www.linkedin.com/company/codedevelopmentgroup



www.instagram.com/codedevelopmentgroup



www.codedg.com





www.linkedin.com/company/coyolfz



www.x.com/CoyolFreeZone



www.coyolfz.com

Evo/ution FREE ZONE



www.linkedin.com/company/evolution-free-zone



www.x.com/evolutionfz



www.evolutionfz.com





An Era of *Transformation*

2023



Evolution FREE

lmino[◊]