

Commitment

Triciclo Tech, S.L. (hereinafter the “Company”) integrates Environmental, Social and Governance (“ESG”) criteria as a foundational pillar of its long-term corporate governance and strategic risk management. As a specialized market actor within the technology, electronics and communications infrastructure sectors, the Company recognizes its strategic responsibility in fostering the transition toward a resource-efficient, transparent and ethically aligned global economy. Our institutional commitment is underpinned by absolute operational integrity, ensuring that environmental stewardship and ethical practices are systematically integrated into our corporate governance and long-term value creation models.

Scope

The scope of this Policy encompasses all operation divisions, physical infrastructures, digital transaction architectures, and international commercial activities. The governing principles detailed herein serve as the baseline for corporate decision-making, strategic supply chain management and stakeholder interactions across the entire value chain, seamlessly aligning corporate frameworks with strategic sales operations. This architecture is designed to scale dynamically alongside the Company’s institutional growth, serving as an authoritative benchmark for enterprise partners, consumers and regulatory bodies.

Governance Framework

Senior Management is aiming to retain ultimate oversight of this framework, ensuring its deployment through integrated internal control systems, accountability protocols and strict alignment with international sustainability standards and international corporate reporting frameworks.

Executive leadership is responsible for evaluating regulatory and operational compliance against this Policy, mitigating corporate risks, and fostering an organizational culture aligned with these institutional standards. Governance and oversight mechanisms are embedded within our management structures to guarantee systemic compliance across the entire Company.

Environmental and Circular Economy Strategy

The Company’s environmental agenda is predicated on the principles of the circular economy, resource optimization and the systematic reduction of electronic waste through our core operations of recovering, refurbishing and redeploying technological assets into the commercial market:

- Product Lifecycle Extension and Tech optimization

The core of our sustainability strategy rests on the retention, optimization and life extension of technological hardware and infrastructure assets. Through evaluation and strict operational rebranding and refurbishment process, we actively restore functional hardware to the economic lifecycle. This practice directly mitigates the accumulation of electronic waste, diverts hazardous materials from disposal streams and minimizes the demand for virgin raw materials and resource-intensive industrial manufacturing processes upstream. In cases when recycling, operations are executed according to international standards, such as ISO 14001, ensuring certified processes and maximum raw material recovery.

- Sustainable Supply Chain and Material Efficiency

We design our fulfillment paradigms and commercial distribution channels under strict criteria of structural optimization and material efficiency. The Company collaborates with established logistics operators executing sustainable distribution models. We prioritize the utilization of highly efficient, recyclable or low-impact materials to eliminate operational waste throughout the product lifecycle.

- **Operational Footprint and Technical Infrastructure Optimization**

In alignment with our internal efficiency culture, the Company manages its corporate facilities and technology systems under functional resource-conservation standards. We prioritize the optimization of our internal hardware assets and utilize cloud hosting solutions designed to ensure operational efficiency, minimizing transactional waste and ensuring that day-to-day operations leverage existing utility networks and communication infrastructures responsibly.

Social impact, labor standards and Human Rights

We foster a secure, inclusive and highly ethical environment across our workplace and extended corporate relationships:

- **Human rights, labor protections and chain value integrity**

We enforce comprehensive compliance with the International Labor Organization (ILO) core conventions and international human rights standards. The Company guarantees safe and inclusive working environments for its workforce, ensuring zero tolerance for forced labor, modern slavery, discrimination or exploitation with any segment of our operations or third-party vendor networks.

- **Stakeholder engagement and transactional integrity**

The Company safeguards the fundamental rights and operational privacy of all institutional and individual stakeholders across commercial ecosystems. Operations are maintained under rigorous standards of transactional integrity, mitigating compliance risks and ensuring absolute transparency in all corporate disclosures and market interactions.

Governance and Compliance

Accountability, market transparency and regulatory compliance constitute the core of our corporate governance architecture:

- **Transparency and disclosure integrity**

In strict alignment with international regulatory frameworks, the Company ensures that all the environmental, operational and institutional disclosures reflect verified, objective and documented operational realities.

- **Business Ethics and market integrity**

We aim to deploy integrated internal oversight mechanisms to safeguard corporate integrity, mitigating operational risks and preventing conflicts of interest or anticompetitive behaviors across all commercial activities. We conduct our business in full compliance with all applicable international trade regulations.

The Company may amend, terminate or otherwise modify this Policy at any time and from time to time.

This Policy was approved by the CEO of the Company on June 1st, 2026.