OCCUPATIONAL SAFETY AND HEALTH MANAGEMENT SYSTEM HANDBOOK



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1. INTRODUCTION

The Company CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES, in compliance with the provisions of Law 1562 of 2012, Decree 1072 of 2015 and current regulations, has structured the Occupational Safety and Health Management System (SG-SST for its Spanish acronym), which aims to structure the joint action between CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES and workers, in the application of measures of Occupational Safety and Health (SST for its Spanish acronym) through the continuous improvement of work conditions and environment, and effective control of workplace hazards and risks.

With this intent, CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES address the prevention of occupational injuries and diseases and the protection and promotion of workers' health through the implementation of a logical and staged method whose principles are based on the PDCA cycle (Plan, Do, Check and Act), including policy, organization, planning, implementation, evaluation, audit and improvement actions.

The joint development of these elements will make it possible to comply with the purposes of the SG-SST. The latter is characterized by its adaptability to the size and characteristics of the Company, to focus on the identification and control of hazards and risks associated with its activity.

2. DEFINITIONS AND ABBREVIATIONS

2.1. Occupational health and safety

Discipline that addresses the prevention of injuries and diseases caused by working conditions, and the protection and promotion of workers' health. It seeks to improve the working conditions and environment, as well as health at work, which entails the encouragement and maintenance of the physical, mental and social well-being of workers. (Law 1562 of 2012)

2.2. Work accident

A sudden event that occurs due to or during work and produces in the worker an organic injury, a functional or psychiatric disturbance, disability or death. (Law 1562 of 2012)

2.3. Corrective action

Action taken to eliminate the cause of a detected nonconformity or other undesirable situation. (Decree 1072 of 2015)



2.4. Improvement action

Action to optimize the Occupational Safety and Health Management System (SG-STT), to achieve improvements in the performance of the organization in Occupational Safety and Health in a manner consistent with the policy. (Decree 1072 of 2015)

2.5. Preventive action

Action to eliminate or mitigate the cause(s) of a potential nonconformity or other potentially undesirable situation. (Decree 1072 of 2015)

2.6. Senior Management

Person or group of persons who direct and control a Company. Decree 1072 of 2015.

2.7. Threat

The latent danger that a physical event that originates naturally or is caused or is accidentally induced by human action will occur with sufficient severity to cause loss of life, injury or other health impacts, as well as damage and loss to property, infrastructure, livelihoods, services and environmental resources. (Decree 1072 of 2015)

2.8. Risk analysis

The process to understand the nature of the risk (see numeral 2.29) and determine the risk level (see numeral 2.24). (ISO 31000:2009)

2.9. PDCA Cycle

A logical, step-by-step procedure that allows continuous improvement through the following steps:

- > Plan: Plan how to improve the safety and health of workers, find out the things that are being done incorrectly or can be improved and identify ideas to solve those problems.
- > **Do**: Implement the planned measures.
- > Check: Verify that the implemented procedures and actions are achieving the desired results.



- > Act: Perform improvement actions to obtain the greatest benefits for the safety and health of workers.
 - * Taken from Decree 1072 of 2015.

2.10. Effectiveness

It is the ability to achieve the desired effect following the performance of an action. (Decree 1072 of 2015)

2.11. Emergency

It is a situation of danger or disaster or the imminence thereof which affects the normal operation of the Company. It requires an immediate and coordinated reaction of workers, emergency and first aid brigades and, in some cases, other support groups depending on its magnitude. (Decree 1072 of 2015.)

2.12. Occupational illness

Resulting from exposure to risk factors inherent to the work activity or the environment in which the worker has been instructed to work. (Law 1562 of 2012)

2.13. Risk assessment

The process to determine the level of risk associated with the level of probability of such risk materializing and the level of severity of the consequences of said materialization. (Decree 1072 of 2015)

2.14. Hazard identification

The process of recognizing if a hazard exists and defining its characteristics.

2.15. Structural indicators

Verifiable measures of the availability and access to resources, policies and organization the Company has to meet the demands and needs in Occupational Safety and Health. (Decree 1072 of 2015)

2.16. Process indicators

Verifiable measures of the degree of development and implementation of the SG-SST. (Decree 1072 of 2015)



2.17. Performance indicators

Verifiable measures of the changes achieved in the defined period, having as a base the programming made and the application of the program or management system's resources. (Decree 1072 of 2015)

2.18. Legal matrix

The compilation of the regulatory requirements demandable to the Company according to the inherent activities of its productive activity, which provide the regulatory and technical guidelines to develop the Occupational Safety and Health Management System (SG-SST), which shall be updated as new applicable provisions are issued. (Decree 1072 of 2015)

2.19. Continuous improvement

Recurrent Occupational Safety and Health Management System optimization process aimed at improving the performance in this field, consistent with the Company's Occupational Safety and Health (OSH) policy. (Decree 1072 of 2015)

2.20. Risk level

The magnitude of a risk (see numeral 2.29) resulting from the product of the probability level (see numeral 2.22) by the consequence level (see numeral 2.23).

2.21. Hazard

Source, situation or act with potential for harm in terms of illness or injury to people, or a combination of these (NTC-OSHAS 18001:2007).

2.22. Probability

The degree to which an undesirable event is likely to occur and may produce consequences.

2.23. Risk

Combination of the probability of occurrence or exposure to a hazardous event(s), and the severity of injury or illness, which may be caused by the occurrence or exposure to said event(s) (NTC-OSHAS 18001:2007).



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2.24. Risk assessment

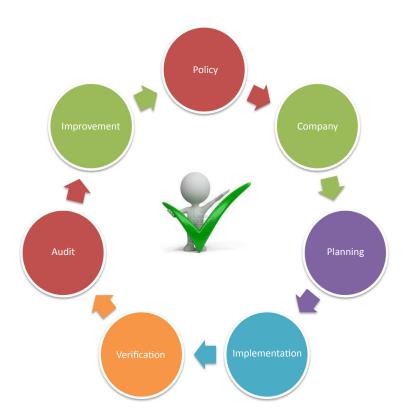
The process of evaluating the risk(s) arising from a hazard(s), taking into account the adequacy of existing controls and the determination of whether the risk(s) is (are) acceptable or not (NTC-OSHAS 18001:2007).

2.25. Abbreviations and Guidelines

The following abbreviations will be found in this document.:

- > SG-SST: Occupational Safety and Health Management System (for its Spanish acronym)
- OSH: Occupational Safety and Health

3. SG-SST OCCUPATIONAL SAFETY AND HEALTH MANAGEMENT SYSTEM SCHEME



4. OBJECTIVES

> Identify, evaluate and assess the existing hazards in the workplace and propose control measures to against hazards to avoid the occurrence of risk



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- > Evaluate and continuously improve the performance of the Occupational Safety and Health Management System.
- Comply with current national legal regulations applicable to occupational hazards.
- Promote worker participation.
- ➤ Design, implement and maintain an Occupational Safety and Health Management System, guaranteeing the necessary conditions to prevent the occurrence of occupational accidents and of or occupational diseases, encouraging a culture of self-care and prevention.

5. POLICY

Senior management, with the joint participation of the Joint Occupational Safety and Health Committee (COPASST), has defined an OSH policy which is communicated and disseminated through induction and re-induction processes, training activities and cycles, training and advertising material, and is also posted in the administrative facilities at all work sites.

The policy is reviewed periodically in management review meetings; it will be updated as required and according to business changes and OSH updates.

6. ORGANIZATION

6.1. Organizational Structure

In the organizational structure of Corficolombiana and its subsidiaries, it is evident that the Company has an appointed position for an Occupational Safety and Health Analyst - USC responsible for coordinating the activities related to Occupational Safety and Health.

6.2. Duties and Responsibilities

CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES are responsible for the protection of the safety and health of its workers following the provisions of Article 56 of (Decree Law 1295 of 1994, the Unified Memorandum of 2004 and other applicable regulations). To this end, it has defined a Job Description Handbook for each position, which assigns responsibilities for safety and health at the strategic, tactical and operational levels. In addition, the positions that are held accountable and that have the authority to manage occupational health and safety actions are established.



6.3. Legal And Labor Aspects

6.3.1. Internal Labor Regulations

CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES have internal labor regulations approved by the Ministry of Labor Protection, which are posted in visible places in the facilities.

6.3.2. Occupational Safety and Health Regulations

The regulations have been prepared following the standards issued by the Employment and Social Security Directorate of the Ministry of Social Protection and are posted in a visible place for workers.

6.3.3. Joint Occupational Safety and Health Committee, COPASST

CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES have a Joint Occupational Safety and Health Committee in compliance with Resolution 2013 of 1986 and Decree 1295 of 1994.

The Joint Committee meets monthly and conducts health and safety activities, actively participating in the operation of the Occupational Safety and Health Management System. The minutes of these meetings are used as a control and monitoring mechanism, duly approved by the committee members.

6.3.4. Labor Coexistence Committee (LCC)

The Company CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES have a Labor Coexistence Committee in compliance with the provisions of Resolutions 652 and 1356 of 2012, created as a preventive measure for Workplace Harassment. It meets every quarter or in cases that require immediate intervention. The Labor Coexistence Committee has a handbook that establishes the roles and responsibilities of its members and describes its operations. The minutes of these meetings are used as a control and monitoring mechanism, duly approved by the committee members.

6.4. Resources Definition

The Company CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES, from the management area, define and assign the physical, financial and human resources for the design, development, supervision and evaluation of prevention and control measures for the effective management of hazards and risks in the workplace, as well as to enable those responsible in the Company, including COPASST, to perform their functions satisfactorily. A budget approved by senior management will be designated annually and its compliance will be evaluated.



6.5. Communication

The Company CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES have established mechanisms for communication, participation and consultation of workers and external stakeholders (suppliers, contractors, customers, community, authorities, among others) on the relevant aspects of the SG-SST. Communication with external stakeholders may be done through the e-mails of the different companies, additionally, they may conduct telephone communications and employ physical media sent to the Company's facilities. Those related to OSH will be received and processed by the corresponding area, which is the Shared Services Unit.

The Company CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES allow the participation of workers in the identification of hazards, risk assessment and determination of controls, investigation of incidents, and the development and review of the Policy and Purpose of Safety and Health at Work. At the same time, workers can be represented in Occupational Safety and Health matters through the Joint Occupational Safety and Health Committee COPASST. The following mechanisms may be used for internal communication to workers on aspects related to the SG-SST: e-mails, bulletins, brochures, booklets on related topics, induction, training and coaching programs, among others.

6.6. Occupational Competency In Safety And Health (Induction, Training And Development)

6.6.1. OSH Induction

When an employee starts working at CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES, they receive a complete induction to their position, including topics related to OSH such as control and monitoring activity. A record is maintained of citations to said training sessions and the evaluations developed by OSH.

6.6.2. Training and Development Program

The Company CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES has a Training and Development Program aimed at providing the knowledge in Safety and Health at Work necessary to perform the employee's activities efficiently and safely, complying with safety standards. This program includes an identification of the OSH training needs according to the skills required by the position and is updatws following the needs of the Company. CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES, maintain a record of control and monitoring activities, emails sent by the Organizational Development area and the follow-up emails sent by OSH to the workers who have completed the virtual course mounted on our platform learning.



6.7. Documentation And Document Control

This handbook has been created to describe the core elements of the Occupational Safety and Health Management System and their interaction. In addition, there is a document control system that allows the control, administration and conservation of documents (including records). There is a master list of OSH documents and records that allows controlling their current versions and defines guidelines for storage, conservation and final disposal of records according to their criticality and importance to the system.

7. PLANNING

7.1. Purpose And Goals

Harmony with the Occupational Safety and Health Policy allows to strategically organize the Occupational Safety and Health Management System, which is disclosed to all personnel and published by CORFICO-LOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES.

7.2. Legal Requirements

One of the commitments of CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES is compliance with current regulations on Occupational Safety and Health applicable to organizations.

A procedure has been defined to identify legal and other requirements (contractual requirements, agreements, conventions) that guarantees the inclusion and timely analysis of new obligations that apply to the Company. It also defines how the Company will comply with the identified legal and other requirements. As a result of this system, the Company has defined as a Registry the Legal Requirements matrix, which is kept updated with all legal and additional requirements related to Occupational Safety and Health; the review of this matrix is performed annually or whenever required by any change in the regulations, recording all modifications through change tracking and versions.

7.3. Hazard Identification, Evaluation And Risk Assessment

The Company CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES have a documented procedure for the continuous identification of hazards, risk assessment and determination of controls to manage them and define priorities in the handling of each. The hazard identification and risk assessment methodology allows the participation of workers and interested parties and the prioritization of risks to establish intervention measures with the following hierarchy structure:

- Elimination of hazard/risk
- Substitution



- Engineering controls
- Administrative Controls
- Personal Protection Equipment

Additionally, CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES have a mechanism to report, control and follow up on unsafe acts and conditions. As a control and monitoring activity, annual updates or revisions are left as evidence through the change control matrix.

7.4. Management Programs

7.4.1. Occupational health management

The main purpose of occupational health and safety procedures and activities is to promote, prevent and control the health of workers, protecting them from occupational risk factors, placing them in a workplace according to their psycho-physiological conditions and keeping them fit for work production.

7.4.2. Management in the workplace industrial hygiene

The Company CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES, within the framework of its management programs, carry out Industrial Hygiene activities for the recognition, evaluation and control of those environmental factors that may cause diseases, affect the health and well-being of workers in their workplaces and that allow the effective implementation of Epidemiological Surveillance Programs.

7.4.3. Occupational safety management

Through the Occupational Safety Management Programs, CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES implement a set of techniques and activities aimed at identifying, assessing and controlling the causes of incidents and accidents at work and working conditions that may affect the safety of workers.

7.4.4. Specific Risk Management Programs

Specific Risk Management Programs are defined according to hazard identification and risk assessment for priority risks that have the potential to generate occupational accidents. These programs include:

- Objectives, indicators and quantifiable targets
- Responsible parties
- Actions
- Resources
- Activity schedules



A periodic evaluation of the programs is done employing compliance, coverage and effectiveness indicators to analyze trends, propose new strategies or action plans, or rethink the activities of the management program and their implementation.

7.4.5. Workplan

Each of the activities of the programs detailed above is defined in a work plan that is proposed annually, with follow-ups and compliance measurements that are presented and duly approved by the legal representatives of each entity.

8. APPLICATION

8.1. Change Management

CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES evaluate the impact on Health and Safety that may be generated by internal changes (introduction of new processes, changes in working methods, acquisitions, facilities, among others) or external changes (changes in legislation, evolution of knowledge in health and safety, among others).

For this purpose, the identification of hazards and risk assessment that may result from these changes is done and prevention and control measures are adopted before their implementation when appropriate, in consultation with the COPASST.

8.2. Emergency Prevention, Preparedness And Response

The necessary emergency prevention, preparedness and response provisions are implemented and maintained, including the following aspects:

- Hazard and vulnerability analysis.
- > SOPs (standardized operational plans following the hazard and vulnerability analysis conducted).
- Resources for prevention, preparedness and emergency response.
- > Program for the training, education, and staffing of the integral brigade for emergency prevention and response, including the organization and implementation of a timely and efficient first aid service.



- > Training of all workers on how to act before, during and after emergencies that may arise from the threats identified in the Company.
- > Periodic inspection program of all equipment related to emergency prevention and response, as well as signaling and alarm systems, to ensure their availability and proper functioning.
- Procedure for planning, performing and evaluating emergency drills.

8.3. Control Of Suppliers And Contractors

CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES have a procedure for the selection and evaluation of suppliers and contractors that have Occupational Safety and Health guidelines and requirements aligned with the procedure of purchases and acquisitions.

9. VERIFICATION

9.1. Monitoring And Measuring Results

CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES regularly supervise, measure and gather information regarding the performance of Occupational Safety and Health within the Company, conduct detailed performance oversight, and periodic follow-ups will according to each indicator defined and established for the measurement of the detailed management programs.

The Company CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES have defined a matrix of indicators that are directly aligned with the Occupational Safety and Health Policy, as well as with its Purpose, and which allows reviewing the different progress and improvement plans that must be taken into account for the implementation of an effective Occupational Safety and Health Management System.

9.2. Investigation Of Work-Related Incidents, Accidents And Diseases

The investigation of the causes of work-related incidents, alleged accidents and illnesses shall be carried out following Decree 1530 of 1996 and Resolution number 1401 of 2007. The purpose of the investigation of incidents and accidents is to:

> Identify and document any deficiencies in the SG-SST and use it as a basis for the implementation of the necessary preventive, corrective or improvement actions.



- Communicate its main conclusions to the COPASST representatives and listen to their observations and recommendations in this regard.
- Inform the persons directly associated with its causes or controls, so that the necessary corrective measures can be taken.
- > Support the evaluation process made by the SG-SST senior management and also take these into account for continuous improvement actions.

The reports and conclusions of investigations conducted by external bodies such as inspection, surveillance and control authorities or by Occupational Risk Administrators will also be considered as a source of OSH corrective, preventive or improvement actions, respecting the confidentiality requirements that apply following current legislation.

10. AUDITING

10.1. Internal Audits

CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES have established that annual audits are conducted to control the system to determine the effectiveness of the Occupational Safety and Health Management System. This situation may change at the direct request of senior management, a client or a competent entity.

Among the activities described in the aforementioned procedure, are planning the audit program with the participation of COPASST, as well as defining the criteria to be taken into account for this exercise.

At the end of each internal audit, the results are recorded in a written report containing, among other aspects, the activities carried out, the positive aspects of OSH management and the opportunities for improvement.

10.2. Management Review

The Company's senior management shall evaluate the SG-SST every year according to the changes in processes, results monitoring and measurement, audits and other reports that allow gathering information on its performance.

The conclusions of this evaluation shall be documented and its main results communicated to the COPASST and the persons responsible for each of the relevant elements, for the timely adoption of preventive, corrective or improvement measures.



11. IMPROVEMENTS

11.1. Continuous Improvements

CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES are aware that by upholding its SG-SST, continuous improvement is reflected in the daily performance of each of the activities carried out in the processes.

The Company guarantees the necessary provisions and resources for the improvement of the SG-SST to improve the effectiveness of all activities and the fulfillment of its purposes.

11.2. Improvement, Corrective And Preventive Actions

CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES have a procedure for preventive, corrective and improvement actions, ensuring that the necessary actions are defined and implemented, based on the results of monitoring and measuring the effectiveness of the SG-SST, audits and review by senior management.

11.3. SG-SST Self-Assessment

CORFICOLOMBIANA S.A. AND ITS NATIONAL SUBSIDIARIES shall conduct an annual self-assessment of the SG-SST to identify priorities in occupational safety and health for updating the annual work plan.

12. REFERENCE DOCUMENTS AND ATTACHMENTS

> Reference documents: Not applicable

> Attachment: Not applicable.

13. TRACKED CHANGES

Date	Version	Type of Change
Nov-05/2019	1	Document created
Mar-04/2021	2	Document Update
		 General update of the document, updating the defined document structure. The purpose of the SG-SST (Occupational Safety and Health Management System) is included



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