

HUMAN RIGHTS AT
CORFICOLOMBIANA



1. BACKGROUND

In Corficolombiana we recognize the human being as the center axis of our activities and are committed to promoting human rights. Accordingly, in the second semester of 2019, we drafted our corporate human rights declaration and policy, which heed international and local regulatory guidelines and was approved by the Board of Directors in the first half of 2020.

This statement supports our vision to be a well-regarded and respected company and institutes 12 principles that frame our actions and endorse respect for the human rights of our employees, customers, suppliers, and of the communities where we operate. In 2021, we implemented and disseminated our human rights policy throughout our companies, with 100% adoption by the Boards of Directors of our investments. In 2022, we worked with all our companies to identify human rights risks and mitigating actions. In 2023, we will build the human rights risk matrix that will encompass the totality of risks of all the Corporation's investment sectors.

Our commitments are:

- We encourage the respect and promotion of human rights as a criterion for management and decision-making.
- We reject any act that violates or infringes on human rights. These include but are not limited to, forced labor, workplace harassment, and human trafficking.
- We have absolute respect for the personal dignity and beliefs of our employees.
- We respect and do not discriminate against people, colleagues, customers, contractors, or suppliers on the basis of sex, religion, political views, nationality, social status, or hierarchy.
- We provide decent, safe, and healthy working conditions.
- We recognize our employees' right to rest.
- We reject child labor.
- We comply with the provisions of current labor legislation.
- We offer fair remuneration under the law.

- We respect the right to free association and collective bargaining.
- We value the culture and diversity of the territories where we operate.
- We act with transparency in decision-making, in the management of information, and to the community in general.

In the same way, our Human Rights commitment encompasses our suppliers, contractors, and other strategic allies. Thus, our commitments are:

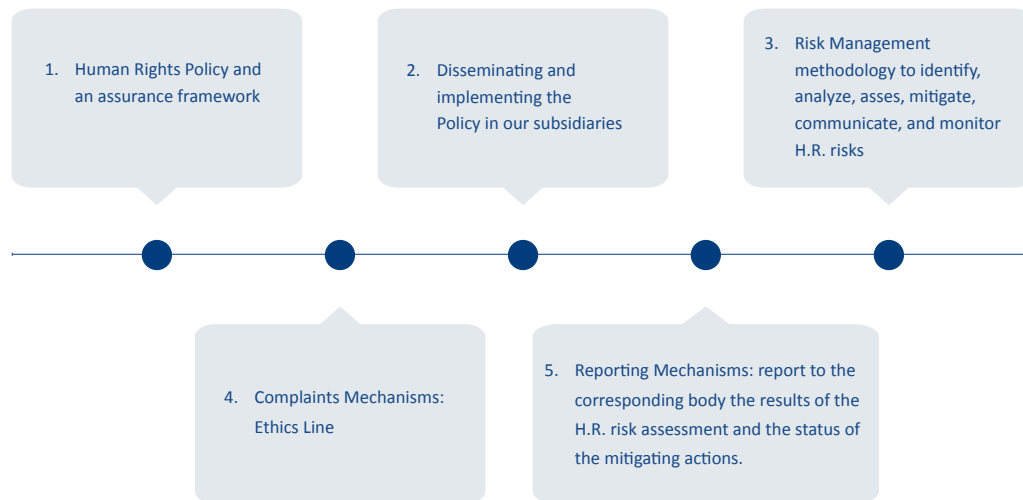
- Disseminate our Human Rights Policy among our suppliers, contractors, and allies.
- Embolden and encourage them to formalize their human rights commitment.
- Include human rights clauses in contracts with suppliers, contractors, or other strategic allies as determined by the Corporation.

We are conscious that our actions can affect the communities where we invest, as well as our customers. Therefore, we are committed to:

- Publicly support the respect of Human Rights.
- Carry out our activities in a way that minimizes social and environmental impacts on the communities where we operate.
- Through our Foundation, or in partnership with other public or private entities, we will seek to advance initiatives that impact human rights in the communities where we invest.

1.1. Assurance Framework

We frame our actions and principles through our Policy, which seeks to build and strengthen the due diligence process. This allows us to manage human rights risks through the following implemented fronts:



2. DUE DILIGENCE

The identification of human rights risks associated with the Corporation's economic activities employs two methodological stages. In the first stage, an initial context analysis is conducted using the following elements as a starting point:

- Review of Company policies, procedures, and commitments
- The human rights legal framework within which the company operates
- Stakeholder expectations related to human rights
- The sector, its risks and challenges in terms of human rights

Once the context analysis has been completed, possible human rights risks are identified along with possible gaps in current policies, processes, and management procedures, identifying the area and/or process responsible. Once this analysis is completed, a probability and impact assessment is carried out through interdisciplinary group meetings to determine the level of inherent risk.

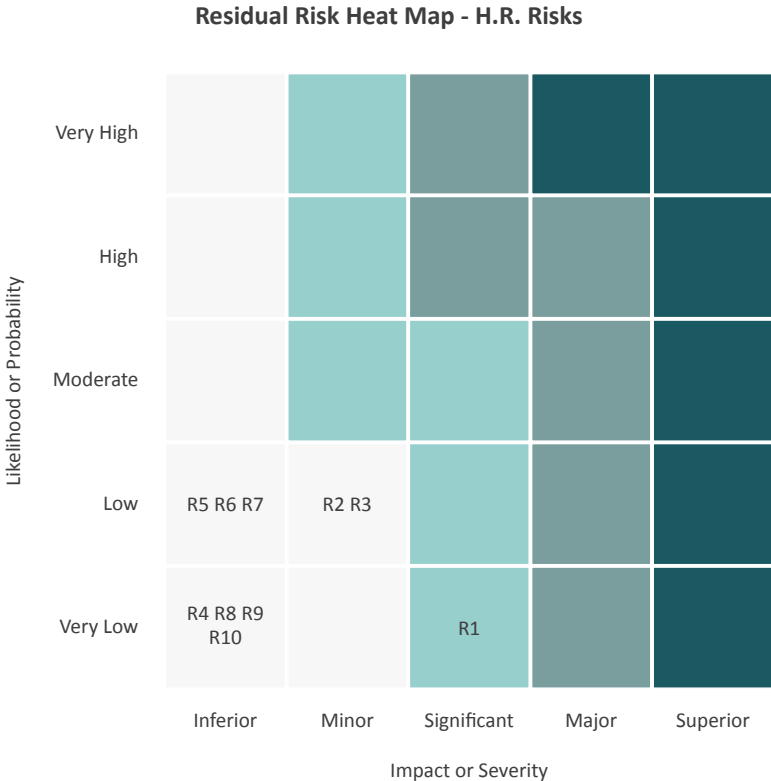
In the second stage, mitigating actions are defined and evaluated under the criteria of design and control execution. As a result of this stage, a risk matrix and heat map of residual risks is attained. These stages may be revised when there are changes to the Policy, processes, and mitigating actions, among others. New investment projects must be aligned with our Responsible Investment Policy. The purpose of this Policy is to establish the framework to include these principles in Corficolombiana's current and future investments. The evaluation process for new portfolio investments will include an analysis of investment proposals that generate or may generate contention because of their social, environmental, and/or corporate governance impact, analyzing whether said contentions are structural or non-structural, the degree of severity, and the management of these contentions by the companies.

2.1. Results of the due diligence process

In keeping with our commitment to promote and respect Human Rights, in 2022 we examined the Human Rights risks in the Corporation and financial subsidiaries. This allowed us to update risk R9 (Unfair conditions in the allocation of duties, positions, and/or salaries). The risks identified and the H.R. risk matrix is presented below:

- R1 Non-compliance with OSH (Occupational Safety and Health) regulations
- R2 Discrimination
- R3 Workplace harassment
- R4 Possible non-compliance with the vacation policy
- R5 Restriction on freedom of association, expression, and collective bargaining rights
- R6 Child labor
- R7 Forced labor
- R8 Incidents that may affect personal integrity
- R9 Unfair conditions in the assignment of duties, positions, and/or salaries
- R10 Non-compliance of suppliers with OSH regulations

In the residual risk assessment, we identified nine risks with a low-risk level and only one risk at a moderate risk level related to non-compliance with occupational health and safety regulations (R1). The results of this assessment are presented below.



In 2022, we worked with 100% of our companies to identify human rights risks and mitigating actions, covering the following groups: Children, Women, Employees, Suppliers, Clients, and Communities. In 2023 we will build the human rights risk matrix that will include the risks of all the Corporation’s investment sectors.

2.2. Reporting Mechanisms

The mechanism established for any employee, customer, supplier, or third party to report a complaint or a human rights event that might involve a possible Human Rights violation is the Ethics Line.

During 2022, there were no complaints filed reporting possible human rights violations; therefore, no redress actions were carried out

3. MITIGATION PLANS AND ACTIONS

The following mitigating actions have been defined and implemented for the aforementioned risks:

3.1. Non-compliance with OSH (Occupational Safety and Health) regulations and incidents that may affect personal integrity

We are clear that our priority must be to ensure the well-being of our collaborators, and therefore have in place an occupational safety and health management system, and permanently monitor compliance with the system's activities. We promote healthy and safe working conditions and environments through a 100% execution of our occupational health and safety system, which is endorsed by our occupational risk insurance company, Alfa. Through these activities we were able to reduce our absenteeism rate to 1.9%, we had three (3) minor accidents without serious consequences (2 men and 1 woman) and zero (0) occupational illnesses or fatalities.

During 2022, we upheld our Covid- 19 prevention objective, implementing vaccination days for 180 of our employees and their families who completed their vaccination schemes in our five national offices (Bogota, Medellin, Cali, Barranquilla, and Bucaramanga).

We resumed our in-person onsite activities when the health emergency ended, based on a work plan focused on prevention and the promotion of good practices, mitigating possible occupational risks. We also carried out periodic medical examinations and executive check-ups to verify the health status of our employees, and continued with our webinars "Enriching Thursday Conversations" ("*Jueves de conversaciones que enriquecen*"), on health-related topics such as breast cancer prevention, nutrition, and emotional intelligence, among others.

3.2. Discrimination

We continue to secure our actions founded upon our Diversity, Equity, and Inclusion (DEI) Policy, which institutes the following principles;

- Equal treatment, respect for human rights, and dignity of diversity
- Environments free from discrimination and providing equal opportunity
- Accessibility and progressive reduction of physical, attitudinal, and communication barriers
- Balance between the work, personal and family life of employees
- Inclusive access

In 2022 we obtained the FriendlyBiz certification, granted by the Chamber of Diversity, which recognizes our Company as a friendly workplace that is responsible towards diversity. In addition, we carried out multiple activities during the year which undoubtedly strengthened our employees' understanding of the Policy and transmitted the various concepts of Diversity, Equity, and Inclusion - DEI. We created the DEI Committee that includes heads of the Corporation's upper management team from different areas and met 11 times during the year. We held 14 awareness workshops with the different business areas, with the participation of 222 employees, where open discussions were encouraged on different DEI concepts. We disseminate our Policy to our outsourcing companies that provide their services to the Corporation to identify areas where we can work jointly. We also consolidated alliances to hire individuals with diverse abilities, and also have in place objective and transparent selection processes that do not discriminate against any individual who applies in published selection processes.

Customer discrimination

The requests made by our customers are recorded in the channels provided for this purpose, and they are addressed and answered objectively and transparently, free from discrimination. We manage the financial consumers' rights within an environment of care, respect, and service through the Financial Consumer Service System (SAC for its Spanish acronym), which includes policies, procedures, and practices to identify, assess, control, and monitor vulnerabilities, the provision of information, adequate addressing of requests, complaints, petitions and claims, and mechanisms for the protection of the rights of financial consumers.

3.3. Workplace harassment

The Company has a labor Coexistence Committee, which receives and processes complaints or claims regarding workplace harassment behaviors or circumstances, which provides an environment for dialogue, promoting dispute resolutions.

3.4. Possible non-compliance with the vacation policy

One of the principles of our Inclusion and Diversity Policy is the balance between the work, personal, and family life of our employees, and also a number of mental health benefits that allow our employees to achieve a better work-life balance and dedicate more time to their families. These benefits include five (5) hours of paid time off per month, flexible workday schedules, flexible work modalities, and remote work. In line with the above, we perform monthly follow-ups on the vacation days taken by our employees.

3.5. Restriction of freedom of association, freedom of expression, and the right to collective bargaining

Limiting or pressuring employees in any way in the exercise of their rights of association is a distinct prohibition for the company and employees, which is reinforced by internal documentation.

3.6. Child and forced labor

We reject child labor and forced labor is prohibited; these points are corroborated in our internal documentation.

With respect to last year, we have included human trafficking, which is considered a crime in Colombia typified in Article 188A of the Colombian Criminal Code, in our commitment and in our actions. Therein, exploitation is understood as obtaining an economic advantage or any other benefit for oneself or another person, through the exploitation of children, adolescents, women, and men, through the execution of non-consensual activities.

3.7. Unfair conditions in the assignment of functions, positions, and/or salaries

Our remuneration plan is based on industry best practices, taking into account the capabilities, experience, skills, qualities, and contributions our people make to the Corporation. It is competitive relative to the labor market and allows us to attract the best talent. We have the ongoing support of a consulting firm that specializes in reviewing market salaries for different positions so that we offer competitive salaries.

3.8. Non-compliance with OSH regulations by suppliers

For a supplier to carry out an activity in our facilities, we verify compliance with safety standards and the corresponding certifications. In addition, we have a Sustainable Purchasing Policy that establishes the sustainability criteria for our purchasing process, seeking to ensure our suppliers adopt sustainable practices and promote their economic, environmental, and social management.

This policy establishes that the Company will avoid contracting with suppliers that have been sanctioned for their non-compliance with human rights, occupational health and safety, legal, fiscal, environmental, or labor matters.

3.9. Other mitigating actions - social contributions by our companies

3.9.1. Agroindustry

During 2022, our companies in the agroindustrial sector performed various social projects targeting the communities where they operate. For example, one of the programs worth highlighting is that developed by Pajonales in partnership with the Fomenta Foundation, which, to create opportunities for women in the agricultural sector, offered a theoretical and practical course in Operation and Maintenance of Agricultural Machinery. A total of 20 women graduated from the program. Furthermore, we conducted the ProHaciendo program, a free formal education teaching model at the elementary and middle school levels, with the participation of 23 employees and their spouses.

Mavalle also worked on projects that contributed to food security, such as planting rice in the Wacoyo and Piapocos la Victoria communities. As a result, we were able to positively impact four communities in three sectors and more than 2,000 local residents.

During the year we also worked with the different indigenous communities that live in the highlands, providing them with employment opportunities. Forty-two percent of our total workforce are members of these ethnic communities. In the area of education, we developed a socio-environmental training course for 30 students from the Kwei Educational Institution which serves the Wacoyo community.

Unipalma supported the research-based technical training program with SENA, in which 21 youngsters participated. We also organized health campaigns, and provided support for cultural and sports activities and community homes, benefitting 3,800 people in four of our neighboring communities.

3.9.2. Infrastructure

During the year, our road infrastructure companies executed 41 projects that improved the quality of life of close to 256,000 people and impacted 47 communities, with an investment of more than COP 1.4 billion. These programs also included the hiring of the local population to work on the projects, with an average of 70% of the workforce hired from the local population.

One of our most significant social programs is the preventive archeology program developed in the Villavicencio-Yopal road corridor by Covioriente. The purpose of this program is to safeguard the archeological heritage in the area, through which 343 pieces of historical value have been rescued and 55 archeological sites have been delimited, which will be of great cultural and tourism significance for the region. Among the discoveries made, ceramics from the Formative Period were identified in the departments of Meta

and Cundinamarca, which places sedentary human occupation between 500 and 800 B.C., extending the presence of pottery-making societies in the region by almost a thousand years. This program has generated 434 jobs in 11 municipalities in the region. During 2022, different stages of the program were developed, such as the archaeological management plan and research processes.

Covipacífico, the road that connects Medellín with the Cauca River valley, supported a beekeeping production project in the municipality of Titiribí, for which centrifuge equipment was delivered to improve the production and quality of natural honey. In addition, as part of the environmental and social responsibility plan and the program to promote entrepreneurs, Covipacífico supported the farmers' fair project through a partnership with the municipality of Amagá and the Association of Agricultural Producers of Amagá (ASOPRAAM). A total of six fairs were organized in 2022 with the participation of more than 57 entrepreneurs and farmers from the region.

Coviandes, Coviandina, Pisa, CCFC, Covipacífico, and Covioriente contributed to institutional and community strengthening by providing training on topics such as mobility, culture, and prevention of traffic accidents, inter-institutional management, environmental awareness, and community participation to over 6,200 collaborators, through an investment of COP 331 million.

Also worth noting is the Punto de Partida (Starting Line) program developed by Pisa, whose aim is to strengthen the literacy skills of 1,548 children from four communities in the Concession's area of influence, providing them with teaching materials and primers, contributing to the improvement of the quality of education in the area and its socioeconomic progress.

3.9.3. Hotels

In 2022, with the support of Compañía Hotelera Cartagena de Indias, we built the Parque Bicentenario park which has an area of 17,415 mt². This city park was designed to meet the recreational and sports needs of some of the poorest areas of Cartagena, including Ciudad Bicentenario, Colombiaton, El Pozón and Villas de Aranjuez. The park, built to the highest design, quality, and durability standards, represents a total investment of COP 34,615 million.

Hoteles Estelar, in its commitment to the communities where it operates, continues to contribute to its partnership with the Fundación Operación Sonrisa (Colombian branch of Operation Smile), providing rooms for medical and administrative personnel in the cities of Bogotá, Barranquilla, Cali, and Manizales during their stay while they perform the scheduled surgeries.

All Estelar hotels adhere to the Prevention of Commercial Sexual Exploitation of Children and Adolescents program (ESCNNA for its acronym in Spanish), by actively communicating to guests and staff information relating to said prevention following UNICEF guidelines.

In partnership with the RECA Foundation, we have increased the hiring of individuals with cognitive disabilities to improve and guarantee inclusive employment practices.

3.9.4. Energy and Gas

Promigas continued contributing to social progress through the implementation of new projects, outreach activities, workshops, and scheduled activities, allowing it to reach a greater number of communities and cement closer relations with the company. In total, Promigas, its related companies, and the Promigas Foundation invested more than COP 36,145 million in social programs, which represents a positive impact on 212 communities and 184,118 people. In addition, COP 8,465 million in third-party resources were channeled through third-party partnerships, 23% more than in 2021.

Promigas' programs contributed to improving the quality of life of its communities through the following initiatives:

- *More Youth Employment:* this initiative provides relevant training to young people in vulnerable conditions, intending to help them to access the job market. In 2022, more than 6,000 young people were served by this program, providing training in areas including English, gastronomy, management, and information technology; 46% of the program's graduates are employed.
- *More Entrepreneurship:* this initiative fosters the development of new businesses through capacity-building workshops for entrepreneurs and provides technical support for the expansion of their productive initiatives. In 2022, 884 businesses and 1,413 people benefited from the project, with high-impact businesses reporting an average growth in sales of 142%.
- *More Productive Communities:* This initiative fosters productive enterprises to generate income and welfare opportunities for rural and urban communities. In 2022, this program benefited 484 productive initiatives and benefitted 1,336 people working in areas such as ceramics, handicrafts, and food security, among others. These networks helped increase the income of agricultural productive initiatives by 203% and by 90% for other enterprises.
- *More Sustainable Territories:* This initiative fosters initiatives connected to the productive use of resources and ecosystem services in areas where climate conditions make them particularly vulner-

able. In 2022, this program was responsible for 118 nurseries, one recycling plant and benefitted 879 people.

3.10. Monitoring of mitigating actions

During 2022, we monitored the mitigating actions, ensuring that the activities defined as mitigating actions were being carried out, and found that all activities to prevent possible human rights violations were being satisfactorily executed.

4. SOCIALIZATION AND DISSEMINATION

In order to strengthen our approach to human rights, such as its history, its conception, the significance for our companies and the backdrop of our policy, in 2022 we trained 361 employees virtually through our platform. We also disseminated the H.R. Policy through our communication channels.

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