



Autopista Río Magdalena


2021 Annual Sustainability Report



ALEATICA

Smart & Sustainable Infrastructure





The best business model is not the one that yields the most growth, but rather the one that **most easily and quickly generates profits in the context of sustainability.**

The little black book of entrepreneurship (2007),
Fernando Trias De Bes

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About the Report

This Sustainability Report of Autopista Río Magdalena (ARM) reflects the company's results in implementing sustainability practices, policies, programs, and strategies. It also includes 2021 financial results, including ARM's performance and its economic, social, and environmental value generation.

ARM defined the contents based on the 2021 Materiality Analysis, which allowed the company to identify the relevant aspects of the sector, the main risks, and impacts, as well as relevant sustainability aspects for ARM's shareholders and main stakeholders.

This analysis will allow the company to communicate its results in its business objectives and measure the positive impacts it generates on society and the planet.

ARM prepared this report based on the GRI (Global Reporting Initiative) and SASB (International Sustainability Standards Board - IFRS Foundation) standards, as well as on the specific requirements of its controlling shareholder, which adheres to the Principles for Responsible Investment and establishes some indicators aligned with environmental, social and governance matters.

Forward-looking statements or declarations

This document contains information and forward-looking statements about ARM, including underlying assumptions, statements regarding plans, objectives, and expectations regarding future operations. Forward-looking statements are not historical facts and are generally identified by the use of terms such as "expects," "anticipates," "believes," "intends," "estimates" and similar expressions.

In this regard, while ARM believes that the expectations contained in such forward-looking statements are reasonable, it is cautioned that forward-looking information and statements are subject to risks and uncertainties, many of which are difficult to predict and generally beyond ARM's control, which risks could cause actual results and developments to differ materially from those expressed in, or implied or projected by, the forward-looking information and statements.

Forward-looking statements speak only as of the date they are made and are not guarantees of future performance. It is not advisable to make any decisions based on forward-looking statements. All forward-looking statements contained in this document are expressly subject to the cautionary statements contained herein. The forward-looking statements included in this document are based on information available as of the date hereof. Except to the extent required by applicable law, ARM undertakes no obligation (even if new information is released or new events occur) to publicly update any forward-looking statements or revise any forward-looking information.



About Autopista Río Magdalena (ARM) and the Report:

Website: <https://www.autopistamagdalena.com.co/>

CEO: Alejandro Niño

Business Sector: Transportation infrastructure operators.

Activity: : Pure operator of road transportation infrastructure.

Country: Colombia

Countries where ALEATICA is present: México, España, Perú, Chile, Colombia e Italia.

Dissemination of the Annual Non-Financial Information Report: Autopista Río Magdalena website and e-mail.

Report preparation cycle: Annual.

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Sustainable Vision



A Message from ARM's CEO

GRI: 102-14

At Autopista Río Magdalena we are proud to present our first Sustainability Report with the results obtained through our entire team's efforts throughout 2021. This report also represents a manifesto of our actions and the commitment we have acquired to be a sustainable company.

To identify what actions we need to take, we conducted our first **materiality analysis** in 2021. This involved reviewing important issues for our sector, the main risks and impacts we face as a company, and the most salient sustainability issues for our stakeholders. On this basis, we developed a **Strategic Sustainability Work Plan** that sets out a roadmap for improving our performance on environmental, social and governance (ESG) issues.

This year, we had important achievements in the five pillars underpinning our work: **Safety First, Passion for the Team, Service Excellence, Social and Environmental Sustainability, and Corporate Integrity.**

Today more than ever, self-care has taken on a crucial role in the world, and at ARM we encourage this culture through the **Healthy Habits, Lifestyles and Work Styles**, through which we take actions aimed at preventing diseases and encouraging physical activity, healthy nutrition, and psychosocial wellbeing for all members of our team.

In addition, as part of our psychosocial risk mitigation measures, we decided to go one step further and, in collaboration with specialist psychologists, in 2021 we designed the **Behavioral Safety Management Program**. A way to strengthen the competencies of our employees, encouraging a transformation and training of leaders who guide and believe that "a world without accidents and occupational illnesses is possible." We seek to consolidate safety as a value, building a new culture.

As a result of our occupational risk promotion and prevention measures, in 2021 we managed to reduce the number of occupational accidents registered by 75% for our employees and by 22% for contractors.



... we developed a **Strategic Sustainability Work Plan** that sets out a roadmap for improving our performance on environmental, social and governance (ESG) issues ...

Despite the challenge posed by the COVID-19 pandemic, during 2021 we maintained our full workforce without modifying the salaries or institutional benefits of our employees, 100% of whom work full time. Likewise, we know that in order everyday training processes are essential to improve; therefore, our entire team received training and education during the year.

Customer satisfaction is vital for us. We take it very seriously and measure it through surveys that allow us to identify growth opportunities to continuously improve our service. **Such surveys showed that we went from 93% in the first half of 2021 to 96% in the second half of the year.**

"A key issue for our operations is maintaining a positive relationship with the community surrounding our operations; however, our community engagement and dialogue processes faced a challenge due to the social distancing brought about by the COVID-19 pandemic. Nevertheless, we are convinced of the importance of keeping a solid communication with the community, and in 2021 we carried on with the strategy developed in 2020: **"Una Huerta en Casa" Challenge**, through which we not only continue our dialogue with the community, but also contribute to food sustainability, mitigating the economic impacts generated by the pandemic, fostering food diversity, and promoting environmental protection.

We seek to address the risks and lessen the impacts of natural disasters that may be triggered as a result of climate change. Therefore, in 2021 we designed our **Climate Change Adaptation and Resilience Strategy**, which encompasses two essential axes: mitigation and adaptation.

Thus, during 2022 we are developing medium- and long-term programs focused on reducing emissions and strengthening our corporate capacity to respond to events arising from climate change.

Integrity and transparency at all levels of our company are paramount. We adhere to internal and corporate policies and procedures that reinforce compliance, as well as the **United Nations Principles for Responsible Investment**. It is worth noting that in 2021 there were no reports of violations of human rights, indigenous peoples' rights or non-compliance with laws or regulations in social and economic matters.

We know that we still have a long way to go at ARM, but we have taken the first steps on our path to becoming an ever-better company. Our commitment is to continue working on ESG issues in our short, medium, and long-term future.

Sincerely,



Alejandro Niño Arbeláez
CEO of Autopista Río Magdalena



Gustavo Chaverra Castillo
Chief Financial and Administrative Officer

Gustavo has more than 25 years of experience in leading financial areas following the business strategy of multinational and national companies in sectors such as road concessions, civil works infrastructure, agribusiness, industry, and services. He has managed the areas of Finance, Administration, Accounting, Taxes, Treasury, Credit, Portfolio, Logistics and Procurement, Human Resources, Budgeting and Costs, and Technology. He has experience in evaluating projects and investment alternatives, maintaining a strong relationship with national and international banks. He has been in charge of corporate reporting under IFRS and USGAAP standards. He is a proven leader with the ability to lead high performance teams and is knowledgeable in the implementation of ERP's such as SAP and BIOSALC.

Why is sustainability important to ARM?

In the first place, at a financial and business level, it is important for ARM to manage strategies and projects in the most sustainable way possible. Finding suppliers, contractors and strategic allies working with non-polluting products, among other things, may contribute to global sustainability. In the second place, at a business and guild level, I consider that this topic has not been dealt with in a deep and extensive way, with proper research. Finally, at a personal level and from the Administrative and Financial perspective, I would like to work accompanying the strategy together with the sustainability area to achieve the objective of a company and group of organizations and people who demand a better economy to protect the environment and our society.

Natalia Zuluaga Grajales
Director of Planning and Financing



Natalia has 14 years of experience in the financial and infrastructure sectors in Colombia. She holds a degree in Economics from Pontificia Universidad Javeriana with a specialization in Finance and Accounting from Universidad Externado de Colombia and FIPECAFI (Sao Paulo, Brazil).

Why is sustainability important to ARM?

ARM is a Business Unit committed in the long term with the country's development and growth. Sustainable development is one of ARM's priorities in order to generate well-being for present and future generations in economic, environmental, and social terms.

Javier Seara Nogueira
ARM Construction Manager



Civil Engineer from the Universidad Politécnica de Madrid.

Why is sustainability important to ARM?

As one of the business centers of ALEATICA, a large infrastructure investment company in seven countries and two continents, it is very important for ARM to transmit the Sustainability policy developed by ALEATICA, since it is a state-of-the-art sustainability policy that respects the main world agreements and treaties in

this regard. But beyond the “duty” of transmitting the policies and pillars of our parent company, I believe that for ARM Sustainability should be important as we are able to impact the small social nuclei along our highway, in the northeast of Antioquia, where local and state organizations in Colombia do not develop Sustainability policies as a priority. Through our work, we can promote a shift in awareness and help these populations to achieve a change in terms of sustainability. As our business involves a long term presence in these communities, awareness can be strengthened over the years.

Julián Arbeláez Giraldo

Director of Operations

Civil Engineer from Universidad Nacional de Colombia, specialized in Strategic Project Management by Universidad Nacional de Colombia and Geotechnical Engineering by Universidad de Caldas. He has more than 10 years of experience in operation (maintenance, user services, weighing, tolls) of highways in Colombia.

Why is sustainability important to ARM?

As an officer of ARM, I consider sustainability to be of the utmost relevance for the company, as it is one of the five pillars guiding the corporate commitment of ALEATICA, our parent company. Additionally, developing a project in a sustainable manner (environmentally, socially, and economically), allows ARM to be trusted and supported by communities, in such a way that the execution and operation of the project is guaranteed until the end, expected to happen in the year 2044.

Gabriel Enrique Camacho Moreno

Technical Director

Civil Engineer by Pontificia Universidad Javeriana since 1987. Gabriel has 35 years of professional experience..

Why is sustainability important to ARM?

Sustainability is very important for ARM. It ensures the balance between the Business Unit’s most significant objectives, such as economic growth, social well-being, and respect for the environment, during the different stages of construction, operation, and maintenance, resulting in a company that is increasingly accountable and securing greater competitiveness and permanence of the business over time.



Hernán Santana Ferrin

Legal Director

Lawyer graduated from Universidad del Rosario, specialized in Contract Law and Tax Law. Master’s in business law from Universidad del Rosario. Graduated from Universidad Francisco de Vitoria (Program with the Ilustre Colegio de Abogados de Madrid), Madrid, Spain. Scholarship holder of the Fundación Carolina, Diploma in Insurance Law by Universidad Javeriana.

Why is sustainability important to ARM?

From a business point of view, I consider that sustainability is important for ARM since its application will allow the company to carry out its activities for a long time and with high quality standards, under social, economic, environmental, corporate and governance criteria that will allow for business continuity, benefiting not only the shareholders but also the Project’s stakeholders.



ESG SAU Committee

Sustainability is key to strengthen the link with ARM's stakeholders and permanently implement practices, policies, and programs. In 2021 ALEATICA SAU created the ESG Committee, which seeks that ALEATICA and ARM, consequently, commit in the long term to add value for our shareholders, recognizing the need for performance to be consistent with the company's objectives and responsible actions in Environmental, Social and Governance matters.

This Committee is made up of Independent Directors of ALEATICA SAU: one member and a Chairman, who will meet twice a year, starting in the second quarter of 2022, for which a Reporting Plan has been developed to report on progress and strategies on ESG issues.

The main purpose of the ESG (Environmental, Social and Governance) Committee is to establish an operational process to facilitate the achievement of the company's ESG objectives and goals, as well as to comply with the Sustainable Development Goals (SDGs) of the 2030 Agenda, to which the company adheres.

The ESG Committee is responsible for:

- Establishing, agreeing, and overseeing the company's ESG strategies, ensuring their implementation and that they remain an integral part of the overall strategy, as well as that social, environmental, and economic activities are aligned.
- Promoting dialogue with the company's various stakeholders to understand their expectations and learn about their knowledge of ESG issues
- Ensuring that the company recognizes the impact of its activities, including its shareholders, customers, employees, suppliers, and the community in general, and that within its overall activities, operations, business growth and development plans, such activities are carried out in a responsible manner.



The **main purpose**... is to **establish an operational process** to facilitate the achievement of the company's ESG objectives and goals, as well as to comply with the Sustainable Development Goals (SDGs) of the 2030 Agenda, to which the company adheres.

- Reviewing social and environmental impacts, as well as potential climate change and human rights risks related to ESG and make decisions that affect the operations and communities surrounding the projects.
- Keeping the Board up to date and fully informed on strategic issues and business changes that may affect the company and the market in which it operates.
- Developing and supporting the activities necessary to translate ESG policies into an effective plan for their implementation and agreeing on a program of specific ESG activities supported by appropriate targets and key performance indicators.

In addition to the ESG Committee, ARM has a Sustainability and Customer Service Department that reports to the Global Sustainability and Customer Service Department, which constantly implements programs aligned with the relevant sustainability objectives and seeks to permeate a solid culture in the company.

Each and every one of ARM's Departments, as well as the Steering Committee, are committed to implementing strategies and ensuring the operational continuity of the projects. Therefore, it is essential to mention all the Departments that are involved through their leadership and action to implement Sustainability in a transversal and permanent way, which makes ARM move towards a more sustainable future.

Autopista Río Magdalena Sustainability and Customer Service Department

ARM embraces ALEATICA's global sustainability policies and strategy. ARM is working to align its business strategy and operations with the UN's Ten Universal Principles on Human Rights, Labor Standards, Environment and Anti-Corruption, and to implement measures that increasingly promote the Sustainable Development Goals (SDGs) in the organization.

Environmental and Social Sustainability are a key pillar for the project's development. The company's goal is to carry out all its activities contributing to a sustainable development, where employees, customers and the surrounding communities are the main beneficiaries.

Each activity seeks to impact the communities, generating not only economic value, but bringing about development that in turn creates social and environmental value. Through the execution of different environmental and social projects that address the needs of stakeholders, and that are structured to benefit the conservation of natural resources, ARM seeks to favor their permanence for future generations.

One of the main objectives for 2021 was to conduct the company's materiality analysis. This allowed to establish the critical path to determine the most relevant ESG issues, which will help the company adapt to changes in the environment, the dynamics of the project and stakeholders' expectations. This process helped ARM define the strategic sustainability plan, with medium- and long-term goals, prioritizing five areas: human rights in business, gender equality and violence, inclusion of people with disabilities, supplier strengthening, and climate change risks.

A climate change strategy is being developed, aimed at implementing adaptation and mitigation actions that seek not only to comply with new climate change requirements, but also to anticipate and be prepared for a highly uncertain future in terms of climate systems. Being one step ahead in climate change issues translates into promoting an early transformation towards a low-carbon and resilient infrastructure, generating in turn, sustainable development for the region where the company operates.

ARM Snapshot

Data¹

GRI: 102-7, 201-1, 207-4

Net sales

477,9

billion Colombian pesos in 2021 and 214 billion Colombian pesos in 2020.

Asset investment

1.985,4

billion Colombian pesos in 2021 and 1,059.1 billion Colombian pesos in 2020.

After-tax profit

-11.962

billion Colombian pesos in 2021 and 6.102 billion Colombian pesos in 2020.

Total employee compensation²

8.997

billion Colombian pesos in 2021 and 8.088 billion Colombian pesos in 2020.



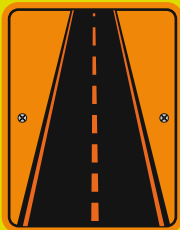
1 All figures are as of the end of 2021.

2 Employee compensation consists of salaries, social security benefits, allowances, life insurance and funeral insurance.

ARM'S Business

GRI: 102-2, 102-4, 102-6, 102-7, 102-15, 207-4, 413-1

 BIENVENIDOS A
AUTOPISTA RÍO
MAGDALENA



Corporate Philosophy

GRI: 102-16

ARM works every day to improve the quality of life of its customers and employees as well as its environmental conditions. ARM develops technological projects for sustainable mobility and generate alliances with organizations committed to caring for the environment.

Through its actions, ARM creates safe roads. In this way, the company's pillars are strengthened in all its operations and projects.



Safety First

Safety is the top priority, always. ARM takes care of every customer, every person, always. It is an attitude embedded in ALEATICA's culture.



Social and Environmental Sustainability

If what the company generates is not sustainable, it is not development. ARM respects and strives to improve the environmental and social context in which it operates. The company promotes human rights and encourages social inclusion.



Passion for the Team

ARM's people, with their commitment, passion, and vision, make it possible to achieve the results and the mission set out as a company. ARM recognizes their efforts, commitment, and collaboration. Both work and personal life are enjoyed.



Transparency and Corporate Governance

The highest standards of corporate governance are applied. ARM adopts the best international practices to guarantee transparency, seeking efficiency and integrity in the service provided, guaranteeing customers the best quality of service.



Service Excellence

The company's raison d'être is people, it owes it to them. ARM takes care of its customers, applying a systemic and innovative approach to provide a high added value service. ARM is an ally of its customers.

ARM provides the smart, **safe and sustainable mobility solutions** that a world on the move requires, backed by cutting-edge technology **that anticipates the needs of customers...**

Sustainability Management

GRI: 102-12, 102-15, 102-16, 102-29, 102-43

If what ARM generates is not sustainable, it is not development.



ARM works every day to **improve the quality of life and environmental conditions.** The company develops technological projects for sustainable mobility and generates alliances with organizations committed to caring for the environment.

“To be aligned with the ESG Committee and meet stakeholders’ ESG requirements, ARM adheres to international sustainability principles and guidelines. That is why it works on aligning its strategy to the Sustainable Development Goals, which will be defined during 2022.”

ARM strives for its Business Strategy and Operations to be aligned **with the UN’s Ten Universal Principles on Human Rights, Labor Standards, Environment and Anti-Corruption,** in order to implement measures that increasingly promote the Sustainable Development Goals (SDGs). ARM contributes directly to some of the 169 goals of the 17 SDGs and indirectly to additional goals of the 2030 Agenda.



At the end of 2021, ARM joined the Global Compact initiative **SDG Ambition** (Sustainable Development Goals), which is an accelerator program that will help define ambitious corporate goals aligned to the **17 Sustainable Development Goals (SDGs)** and accelerate their integration into the core of the business strategy and performance management, which will be established and measured starting in 2022.

ARM directs its actions based on the vision set by the Global Sustainability Management, which bases its strategy on **the Corporate Sustainability Policy and Standard**, guidelines that seek to be an agent of well-being that contributes socially and environmentally. To this end, ARM develops social and environmental programs and projects that respond to the needs identified in the region where it operates, in order to generate a positive and measurable impact on society and the environment and, in turn, contribute to the sustainability of the business.

ARM's principles

- Adding value to all ARM's stakeholders, such as customers, communities, investors, employees and third parties, through internal and external social and environmental investment.
- Social and environmental sustainability culture, based on the implementation of national and international standards.
- Complying with social and environmental regulations and other legal requirements applicable to the organization.
- Respecting, protecting, and promoting human rights of the company's stakeholders.

Sustainability Commitments

GRI: 102-20

- Implementing a **Strategic Sustainability Plan** that allows to diagnose and prioritize internal and external social and environmental needs.
- Collaborating with all areas of the organization to develop programs and projects to address the most relevant issues, as well as to evaluate the impacts.
- Assessing the physical and transitional risks associated with climate change and contributing to the reduction of carbon emissions, waste, and polluting materials, as well as energy efficiency, through projects, actions, and initiatives
- Supporting the implementation of the **Safety First Plan**, by providing road safety education training to communities, neighbors, and customers.
- Conducting sustainability workshops aimed at integrating the culture of sustainability for stakeholders, on internal and external sustainability issues.
- Complying with the **Sustainable Development Goals (SDGs)** of the 2030 Agenda since ARM is a member of the United Nations Global Compact.
- Periodically reporting to stakeholders on the actions implemented and the results in terms of social and environmental sustainability, as well as the impact generated.

- Allocating economic, human, and technical resources that have a positive impact in environmental and social terms.
- Communicating both internally and externally the implemented programs and projects, as well as the impact generated in terms of sustainability.

Given ARM's commitment to the environment, this year the company integrated into **its Sustainability Policy** environmental commitments applicable to all its employees and stakeholders, in order to create a culture and awareness of the importance of caring for the environment.

Environmental Commitments

- Ensuring environmental protection, working in a preventive manner to minimize the environmental impacts produced as a result of the company's activities, respecting the ecosystems and biodiversity in the environments in which it operates.
- Assessing the physical and transitional risks associated with climate change and contributing to the reduction of emissions and carbon footprint, contributing to energy efficiency through projects, actions, and initiatives.
- Performing an annual periodic evaluation of legal requirements and environmental aspects, to maintain, control and improve processes.
- Preventing environmental pollution through source reduction and recovery of waste generated, with a circular economy approach.
- Preventing soil and groundwater pollution by controlling discharges into the environment and preventing environmental incidents.
- Promoting the efficient use of water and energy resources, prioritizing savings and reduction.

- Maintaining an environmental culture in all employees by complying with the **Annual Sustainability Training Program**, through awareness and sensitization, as well as training and development in environmental matters.
- Integrating and maintaining the Environmental Management System with ISO 14001 guidelines in order to ensure continuous improvement and effectiveness of processes.

As a result of the above, ARM implement the **Strategic Sustainability Plan** based on a methodology composed of three phases:

- 1) Diagnosis.** Through a Materiality Analysis, which aims to identify the most relevant issues for internal and external stakeholders, as well as social and environmental needs.
- 2) Project Management and Social Action.** Identified relevant issues will be prioritized and addressed through social and environmental projects and/or actions, which in turn will allow to prevent risks, comply with applicable laws, and meet the needs of the communities and the expectations of investors and stakeholders.
- 3) Impact Assessment.** To ensure that the resources allocated to social and environmental projects and actions, both internal and external, represent an investment that positively changes the reality of the beneficiaries, the impact generated will be followed up, monitored, and evaluated in order to measure their effectiveness or, if necessary, to propose improvements in the execution of the projects.

Materiality Analysis

GRI: 102-40, 102-42, 102-43, 102-44, 102-46, 102-47, 103-1, 103-2

The Materiality Analysis of relevant sustainability issues is a strategic value creation process that allows the identification of economic, social, and environmental issues for ARM and its stakeholders.

In 2021, we conducted our first Materiality Analysis with the following methodology:

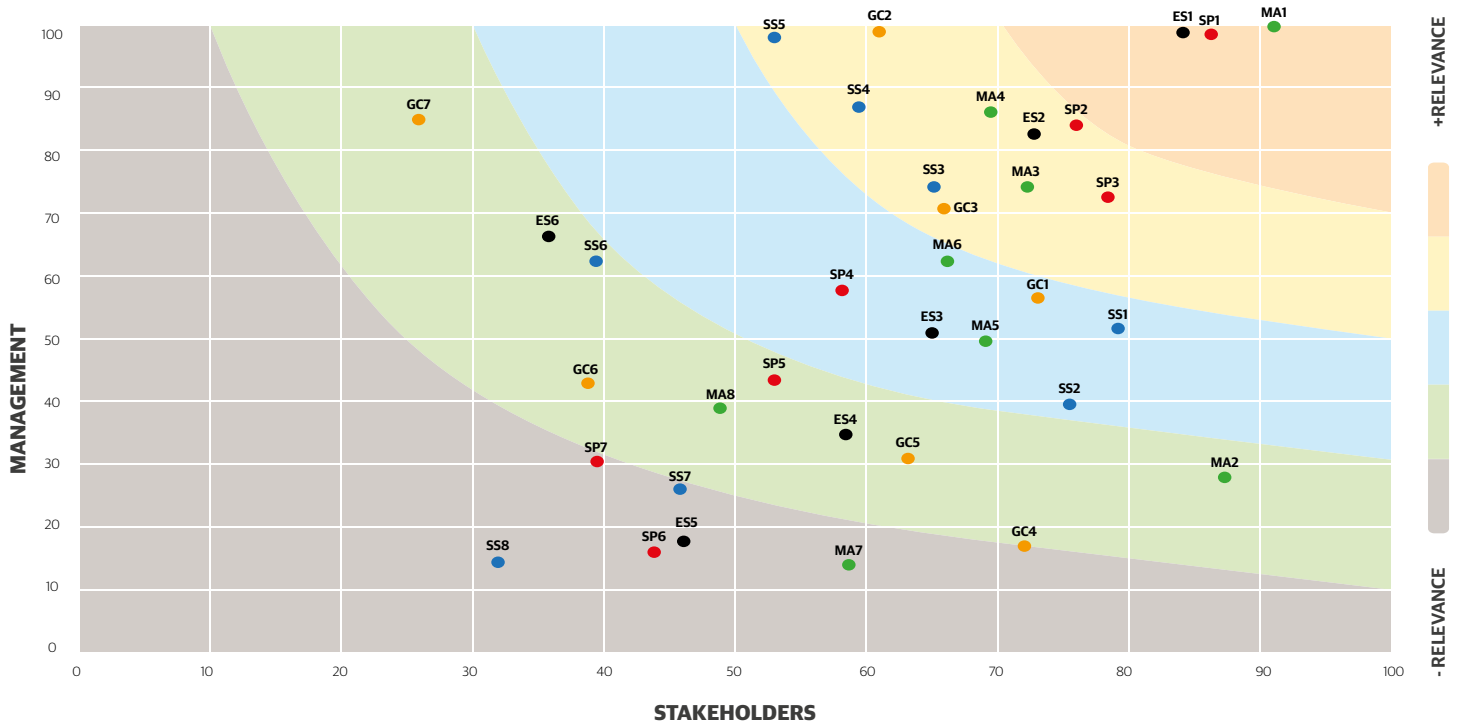
- Evaluating the level of maturity and control with all key areas obtaining a score of 76% according to sustainability criteria and identification of practices, policies, and programs, focused on the following topics:
 - Transparency and Corporate Governance
 - Business Ethics
 - Stakeholders and Materiality
 - Passion for the Team
 - Occupational Health and Safety
 - Sustainable Development with Social Impact
 - Sustainable Development with Environmental Impact
 - Human Rights
 - Customer Service Excellence
- The following standards were taken as reference: GRI Standards, SASB, MAS, IFC, Equator Principles, United Nations Guiding Principles on Business and Human Rights, IFM, Spanish Law (11/2018), Italian Law.
- An analysis of the actions and programs developed by competitors (ABERTIS, ACCIONA, ALDESA, COVIANDES, CINTRA, GLOBALVÍA, GRUPO MOTA ENGIL, Concesionaria Vial del Oriente and Concesionaria Costera Cartagena Barranquilla) was carried out.
- An analysis was made of positive, negative, and neutral media topics, global trends, and issues relevant to the Colombian government.
- An analysis of ARM's main stakeholders was conducted and they were prioritized in order to establish a dialogue and apply surveys.
- Environmental and social impacts in ARM's value chain were identified.
- Risk Management identified risks and aligned material topics.
- ARM engaged in dialogue with over 1,173 stakeholders.
 - Investors (1)
 - Management (17)
 - Office and operational employees (100)
 - Strategic suppliers (20)
 - Vehicle drivers (15)
 - Municipalities (3)
 - Allies for emergency response (2)
 - Strategic allies (3)
 - Communities (85)
- Once the stakeholders were identified, the sample was defined and a survey was designed with a list of material topics that included relevant issues from the three axes of Sustainability (environmental, social, and economic), taking into account relevant issues of the sector and the context.
- At the end of the dialogue with stakeholders, materiality matrices were prepared and relevant sustainability issues to be addressed were identified, in accordance with ARM's local priorities.

13 issues of major relevance were identified, which ARM will prioritize in the coming years.

1. Environmental legal compliance
2. Occupational safety
3. Ensure road conditions
4. Occupational health
5. Emergency management and road assistance
6. Water consumption and discharge
7. Materials and waste
8. Training, education, and awareness in the community.
9. Monitoring and ensuring compliance with human rights.
10. Assistance to social / property management.
11. Working conditions and working environment
12. Business ethics, anti-corruption, and whistle-blowing mechanisms.
13. Risk management



Materiality Matrix



PASSION FOR THE TEAM/ SAFETY FIRST (EMPLOYEES)

		LEVEL OF RELEVANCE	CONTROL	MATURITY
SP1	Occupational safety	1		90
SP2	Occupational health	2		90
SP3	Working conditions and work climate	2		90
SP4	Training and education	3		90
SP5	Talent management	4		75
SP6	Diversity, Workplace Equality, Inclusion, and Non-discrimination	5		50
SP7	Work-life balance	5		75

SERVICE EXCELLENCE/ SAFETY FIRST (CUSTOMERS)

		LEVEL OF RELEVANCE	CONTROL	MATURITY
ES1	Ensuring optimal road conditions	1		75
ES2	Emergency response and road assistance management	2		75
ES3	Operational model and operational continuity	3		100
ES4	Customer service and support	4		100
ES5	IT security and cybersecurity	5		100
ES6	Health risk	4		75

SOCIAL SUSTAINABILITY

		LEVEL OF RELEVANCE	CONTROL	MATURITY
SS1	Labor Outreach	3		75
SS2	Community information and participation	3		75
SS3	Community Training, Education, and Awareness Raising	2		75
SS4	Monitoring and Assurance of Human Rights Compliance	2		58
SS5	Assistance to social / property management	2		75
SS6	Support for Institutional Management Capacity	4		75
SS7	Supplier Social Evaluation	5		50
SS8	Preventive Archaeology	5		100

ENVIRONMENTAL SUSTAINABILITY

		LEVEL OF RELEVANCE	CONTROL	MATURITY
MA1	Environmental Legal Compliance	1		90
MA2	Biodiversity	4		100
MA3	Water Consumption and Discharge	2		50
MA4	Materials and Waste	2		50
MA5	Energy Consumption	3		50
MA6	Carbon footprint Measurement and Reduction	3		50
MA7	Supplier Environmental Assessment	5		
MA8	Climate Risk	4		25

CORPORATE GOVERNANCE

		LEVEL OF RELEVANCE	CONTROL	MATURITY
GC1	Proper Relationship and Communication with Management	3		75
GC2	GC2 Business Ethics, Anti-Corruption and Ethical Reporting Mechanisms	2		100
GC3	GC3 Risk Management	2		90
GC4	GC4 Transparency and Accountability	4		91
GC5	GC5 Regulatory Assessment and Compliance	4		90
GC6	GC6 CSR Information Management and Reporting	4		75
GC7	GC7 Structure and Governance	4		100

+ RELEVANCE 1 2 3 4 5 - RELEVANCE

*Control: Decision-making and action freedom, and the possibility of influencing the subject matter.

*Maturity: No progress; there is writing or some action; there is some document and action; there is communication with management; it is measured and improved.

Evaluations and Awards

In 2021 ARM participated in different rankings / benchmarking in ESG issues and was positively evaluated and classified within the sector.

GRESB 2021

- The @GRESB evaluation is of great value to our controlling shareholder IFM, as it is considered a reference framework for global financial markets, through the evaluation and assessment of maturity in ESG issues worldwide, in aspects related to the performance of investment and infrastructure assets.
- During the first year participating, ARM ranked sixth in the Latin American Transportation Companies Sector @GRESB 2021 Sustainability Index on ESG performance for its assets in operation.

Through these efforts, ARM reiterates its commitment to continue promoting best practices in sustainability in order to reduce its environmental footprint, improve control and mitigate risks, promote its employees' health and safety, and act as an agent of well-being for the communities where it operates.



Partnerships for Development

GRI 102-13

As part of the strategy to improve relationships with the communities the company serves, as well as with stakeholders, ARM has established several partnerships

- Colombian Chamber of Infrastructure - ARM.
- Colombian Chamber of Infrastructure (Cámara Colombiana de la Infraestructura) - ARM. CCI is a business trade association that promotes socioeconomic development through a modern and efficient infrastructure, defends institutionalism, ethical principles, and transparency, seeks balance in contractual relations, advocates for the

strengthening of the companies involved in the value chain and their human resources, and has a significant influence on the design, construction and implementation of public policies related to the sector.

- National Apprenticeship Service (*Servicio Nacional de Aprendizaje*) (SENA³) - ARM.
- Chamber of Commerce of Magdalena Medio and Northeastern Antioquia (*Cámara de Comercio del Magdalena Medio y Nordeste Antioqueño*) - ARM.



Taxation and Tax Contribution

GRI: 207-1, 207-2, 207-3, 207-4

ALEATICA is the controlling company of Autopista Río Magdalena S.A.S., it is the corporate body that defines the tax strategy for all the companies based on the following pillars:

1. Sustainability: Commitment to timely compliance with all tax obligations generated as a result of economic activity, in accordance with applicable local and international regulations. ARM is also committed to contributing to economic and social development in the different jurisdictions in which it is present by paying taxes on time, in accordance with the applicable regulations at all times.

2. Transparency: Providing truthful and complete information to stakeholders, including information related to the tax

contribution made in each of the markets where the company operates, as well as a seamless and cooperative relationship with each of the administrations it deals with.

3. Caution: All tax positions are based on sound economic grounds, avoiding predatory tax planning schemes or practices, and always bearing in mind the precautionary principle when assuming risks.

4. Risk control: Potential tax risks are incorporated into the integral risk management system, following up on them and taking all appropriate measures to minimize them.

Governing body responsible for the tax strategy

ALEATICA's Board of Directors is responsible for approving the measures that make up the tax strategy. ARM has a team of professionals highly qualified in the country's tax regulations who are responsible for tax planning. They are supported by a BIG4 as an advisor to ensure compliance with tax governance. Simultaneously ALEATICA has a tax area that validates the company's tax strategy.



Tax approach in the organization and regulatory compliance.

ARM adheres to the provisions of ALEATICA, a company dedicated to promoting, developing, and managing infrastructures, whose main business objective is to offer customers the highest standards of quality and safety, guaranteeing sustainability in every project.

Its tax strategy is fully oriented towards business optimization, seeking to create shareholder value in a sustainable manner.

To this end, the tax area coordinates with the different areas (financial, business, etc.) to allow a joint vision when making decisions, including the evaluation of risks in tax matters, as well as tax planning aimed at a legitimate optimization of resources under the premises of the strictest legality.

The company performs the relevant tax adjustments evaluated by an external tax advisor, who supports the entire process of preparing and verifying figures. The tax advisor also assists the company in determining appropriate treatment of certain standards to prevent the company from incorrectly interpreting them. Throughout the year and on a monthly basis, they compare against the company's financial model, resulting in a tax refinement and determining the income generated, taking advantage of tax benefits.

Taxation and stakeholders

The principle of transparency, one of the pillars of the tax strategy, includes maximum cooperation with the authorities that oversee economic activities in every jurisdiction where the company operates, trying to minimize potential tax discrepancies as much as possible.

In addition, non-litigious alternatives for conflict resolution are prioritized when feasible and the possibilities offered by legal procedures to enhance agreements with the administrations.

ARM fully complies with its fiscal commitments controlled through the fiscal calendar prepared by the company. The perfect compliance with these obligations is reviewed by the external auditors and the tax auditors in order to ensure proper compliance with regulations. By validating and reviewing through external auditors, tax auditor and tax advisor, the company generates confidence in due compliance.

Tax risk management approach

Potential tax risks are incorporated into the integral risk management system and are monitored. All appropriate measures are taken to minimize them.

To this end, the tax area works in coordination with the Internal Risk Department to ensure the correct incorporation of tax risks in the corporate risk matrix, as well as their adequate monitoring and evaluation.

Compliance with the tax governance and control framework

The tax control framework is based on the following pillars:

1) Principles of action:

- ALEATICA's Board of Directors defines and approves the tax strategy.
- Comprehensive management of tax matters in coordination with business activities and decisions.
- Alignment with the code of good tax practices.

2) Tax compliance processes:

- Standardized internal processes for managing tax matters in coordination with internal teams from both ARM and other jurisdictions.
- Tax compliance control systems.
- Robust internal tax reporting system.

3) Team:

- Expert and experienced in-house professional team. Proactive coordination of all team members.
- External support from consultants with proven solvency whenever necessary



4) Tax risk control and management

- Integrated tax risk management system.
- Detailed monitoring of each of the potential tax risks detected and flexibility to adapt to new regulatory environments

Whistle-blowing mechanisms in relation to taxation

ARM is committed to implementing the highest standards of transparency applicable both to employees and in relations with different stakeholders.

This commitment is reflected in the promotion and adoption of the best international corporate governance practices and the transparency mechanisms necessary to guarantee a reliable and equitable service to customers, clients, and communities, such as the Code of Ethics and the Anti-Corruption Policy, both of which are public corporate documents available on ARM's website.

Likewise, an independent Ethics Channel has been set up through which, in a reliable manner, criticisms or complaints can be submitted in order to improve the corporate integrity we strive for.

Difference between corporate income tax accrued on profits or losses and taxes assessed

The permanent differences correspond mainly to:

- Expenses considered non-deductible for tax purposes.
- To the allocation and application of provisions.
- Withholding taxes paid abroad.
- Consolidation adjustments.

The deferred taxes recorded are due to:

- Differences that exist between accounting and tax regulations mainly due to differences in criteria in the recognition of accounting financial assets and tax intangible assets, as well as the recognition of interest accrued on subordinated loans.

Contributions to political parties and/or representatives

In 2021, no contributions or similar have been made to any political party and/or representative in all jurisdictions and/or resident entities for tax purposes, as company policies forbid this.



Tax Contribution

GRI: 207

Transparency and tax accountability are fundamental pillars in the Tax Policy and, therefore, in the management of all the economic activity. These principles are embodied in the diligence in complying with all tax obligations, including taxation and collaboration with the Tax Authorities in each jurisdiction where the company operates.

ARM's economic and social contribution is reflected not only in the payment of taxes of different nature but also on account of taxes and contributions paid to the public coffers of each jurisdiction by other taxpayers as a consequence of its economic activity, such as indirect taxes or withholding taxes.

In keeping with this commitment to maximum transparency, ARM proceeds to quantify the total tax contribution made in all the jurisdictions where it operates.

Two main categories are identified, Taxes borne and Taxes collected, specifying whether the taxes represent an effective cost or a collection on behalf of other taxpayers, respectively.

In turn, in each category, some generic groups of taxes and contributions are identified according to their nature, always following the cash basis.

ARM'S OWN TAXES (BILLIONS OF COLOMBIAN PESOS)	2020	2021
Taxes on profits	49.594	309.746
Municipal and district taxes	18.440	34.612
Rates and Others	42.318	51.930
Total	110.712	396.288

Grants

GRI: 201-4

No significant grants were received during fiscal year 2021.



A	B	A+B
1	3	4
2	8	10

Financial Results Discussion and Analysis

In 2021, losses in ARM's financial statements were reported because the financial costs related to the project financing are higher than the company's gross profit comprised of the revenues obtained from the construction operation and the valuation of the financial asset minus the construction costs.

During 2021, the investment in infrastructure amounted to \$349,191,889 Colombian pesos, resulting in financial assets of \$923,085,159 Colombian pesos and a valuation of \$383,746,612 Colombian pesos, amounting to a total of \$1,306,831,771 Colombian pesos.

As of December 31, 2021, the progress of work for each of the functional units is as follows:

FUNCTIONAL UNIT	% PROGRESS
1	7%
2	17%
3	48%
4	100%

The results obtained in 2021, compared to 2020, reflect a significant decrease in profit, due to the fact that during the settlement, financial costs were generated that were not incurred in 2020.

Achievements of the ARM finance area in 2021

ARM achieved the financial settlement of the concession to guarantee the execution of the project. Settlement was for 2.8 trillion Colombian pesos for ARM, which confirms the investment trust of banks and the national and international market in the development of Colombian infrastructure.

The structuring of the financing was developed by the company with Goldman Sachs and Banco Santander, and has had the support and participation of the following entities: Bancolombia, FDN (*Financiera de Desarrollo Nacional*), the Senior Debt Fund for Infrastructure in Colombia CAF-AM Ashmore (*Fondo de Deuda Senior para Infraestructura en Colombia CAF-AM Ashmore*), Crédit Agricole Corporate and Investment Banking, Sumitomo Mitsui Banking Corporation, ICO (*Instituto de Crédito Oficial de España*), BCP (*Banco de Crédito del Perú*) and Siemens Financial Services, as well as a set of investors and in a combination of bank and bond tranches in Colombian Pesos, RVU and US Dollars.

Organization's Main Activities

Autopista Río Magdalena is a company whose sole purpose is the subscription and execution of the concession contract derived from Public Tender No. VE-IP-LP-006-2013 carried out by the National Infrastructure Agency (Agencia Nacional de Infraestructura, ANI) whose purpose is to carry out the definitive studies and designs, financing, environmental, property and social management, construction, improvement, rehabilitation, operation, maintenance and reversion of the Autopista al Río Magdalena 2 Concession created in November 2014. Operations began in 2015.

Geographic Location

GRI: 102-2, 102-4, 102-6, 102-7, 102-45

ARM is a commercial company, of the simplified joint stock company type, of Colombian nationality, incorporated under the laws of the Republic of Colombia and especially Law 1258 of 2008.

The Autopista al Río Magdalena 2 project corridor is located in the Departments of Antioquia and Santander, with the objective of connecting the southwest and central west of the country directly with the Port of Cartagena and the north of the country and the northeast of Antioquia with the Ruta del Sol Concession through Puerto Berrío, projecting that it will become one of the most important road corridors in the country. The Autopista al Río Magdalena 2 project corridor is located in the Departments of Antioquia and Santander, with the objective of connecting the southwest and central west of the country directly with the Port of Cartagena and the north of the country and the northeast of Antioquia with the Ruta del Sol Concession through Puerto Berrío, projecting that it will become one of the most important road corridors in the country.



The entire concession is comprised of the following functional units and the following activities:

- Functional Unit 1:** This is a **35.7 km stretch of new roadway to be built** between the municipalities of Remedios and Vegachí in the Department of Antioquia. The construction of a new toll booth located in the Santa Isabel area is part of the scope of this functional unit.
- Functional Unit 2:** This is a **34.8 km stretch of new roadway construction** between the Municipality of Vegachí and the Alto de Dolores sector in the Department of Antioquia. The construction of a new toll road in Vegachí is part of the scope of this functional unit.
- Functional Unit 3:** This is a **49 km stretch of existing roadway between** between the Alto de Dolores sector and the Municipality of Puerto Berrío in the Department of Antioquia, on which a **renovation and 33 improvement points are to be carried out**, between PR 41+059 (Alto de Dolores Sector) and PR 90+800 of RN 6206. The Puerto Berrío toll station located at PR 85+ 150 is part of this section.

- Functional Unit 4:** This is a de **34 km** section consisting of the **construction of a new 14 km roadway** (variant to the Municipality of Puerto Berrío), **the improvement of 10 km** between PR 103+445 and PR 114+048 and **the operation and maintenance of 10 km** of the sections between PR 90+800 and PR 95+197 (Access to Puerto Berrío Oeste) and between PR 98+443 and PR 103+445 (Access to Puerto Berrío Este - Puerto Olaya in the Department of Santander) of RN 6206. The construction of the 1,360 m viaduct over the Magdalena River is included in this functional unit.

The main operating variables to 2021 are as follows:



Since its inception, ARM has provided services from the Municipality of Puerto Berrío, Antioquia, Colombia.

⁴ Average Equivalent Paying Traffic (AEPT).

Headquarters location

- Main administrative office: Carrera 17 No. 93-09 Bogotá D.C., Colombia.
- Emergency Response Center (*Central de atención de emergencias, CAE*): Calle 51 No. 2-06 Puerto Berrío, Antioquia.
- Customer and social care centers:
 - Carrera 6 No. 4-24, Barrio El Hoyo, Puerto Berrío, Antioquia.
 - Carrera 30 No. 29-14 Maceo, Antioquia.
 - Carrera 49 No. 49-16 y 49-22 Vegachí, Antioquia.

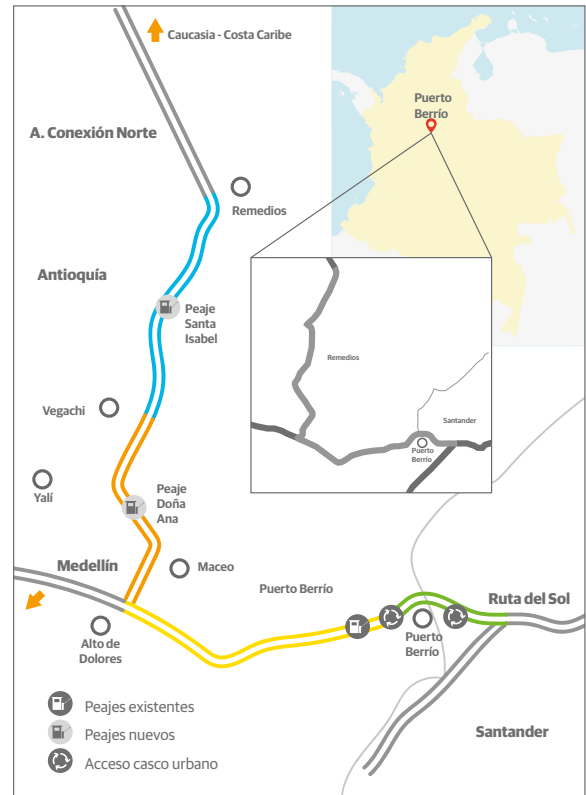
Markets served

The area of influence of the road under concession to ARM includes the municipality of Cimitarra in the Department of Santander and the municipalities of Puerto Berrío, Maceo, Yalí, Vegachí and Remedios in the Department of Antioquia.

ARM's main client is the National Infrastructure Agency (Agencia Nacional de Infraestructura, ANI),⁵ which is a National State Agency of Special Nature of the decentralized sector of the Executive Branch of the National Order, with legal status, its own assets and administrative, financial, and technical autonomy, attached to the Ministry of Transportation, according to Decree 4165 dated November 3, 2011.

ANI's purpose is to plan, coordinate, structure, contract, execute, manage, and evaluate concession projects and other forms of Public-Private Partnerships (PPP) for the design, construction, maintenance, operation, administration and/or commercialization of public transportation infrastructure in all its modes and related services.

VARIABLE	VALUE
Km currently in operation	70
Average Equivalent Paying Traffic (AEPT)	2.455
Km under construction	83,3
Routine Maintenance (km)	70
Cleaning of vertical road signs (Unit)	8.362
Cleaning of transversal drainage works (Unit)	5.602
Cleaning of longitudinal drainage works (Km-track)	859
Maintenance of green areas (clearing, collection and cleaning) (m2)	3.551.589
Landslide removal (m ³)	3.415



The main reason for ARM's existence is to meet the needs of road customers, who are the direct beneficiaries of the tasks entrusted to it: pedestrians, cyclists, motorcyclists, drivers, and passengers of vehicles (cars, all-terrains, vans, buses, minibuses, trucks, and tractor-trailers) that use the road on a daily basis.

Services provided

In 2021, ARM provided the following services in accordance with the concession contract:

VARIABLE	VALUE
Manual cleaning of transverse works' drainage canals (m)	47.093
Metal fender cleaning (m)	36.212
Fallen trees removal (Unit)	50
Bridge cleaning (Unit / month)	10
Road corridor operation (km)	70
Ambulance services (Unit)	268
Repair Car Services (Unit)	544
Tow Truck Services (Unit)	1.082
Inspection Services (Events)	628

Data

GRI: 102-7, 201-1

Annual Traffic

48.975.990 veh-km in

2021 and 37,550,520 veh-km in 2020, an increase of 30%, mainly due to the country's economic revival as the global health crisis due to the COVID-19 pandemic is being brought under control.

2021 Operational Achievements

1. 100% compliance with service levels (condition and operation indicators in accordance with Appendix 2 of the concession contract).

During 2021, the expected service levels were met in accordance with the concession contract:

Condition indicators

- Margin condition (vegetation height <40 cm): The concessionaire complied with this obligation throughout 2021.
- Potholes (affected area <= 4% of the roadway): This indicator was not breached during 2021.
- Surface, longitudinal, and transversal drainage (clogging <=25% of the hydraulic section): The drainage works were cleaned throughout the road corridor, clearing them of obstructions, in compliance with the contractual requirement.

- Vertical signaling (reflectivity >80%): The parameters of the indicator were met along the entire road corridor, based on measurements taken in conjunction with the auditor's office.

Operation indicators

- Incident response time: The concessionaire complied with the attention times established by the concession contract.
- Accident and emergency response time: The maximum times established in the concession contract were met.



2. Simulation of emergencies in traffic accidents.

In accordance with the provisions of the concessionaire's operations manual, on December 17, 2021, an emergency response drill was carried out, which consisted of simulating a vehicle fire on the side of the right-of-way. Its scope was to measure the capacity for reaction, action, communication, coordination of internal teams and with external disaster response entities within the area of influence of the project.

The event was attended by **22 people from different entities involved**, such as Concesionario Autopista Río Magdalena S.A.S., **the Fire Department of Puerto Berrío**, **the Transit and Transportation Department of the National Police**. This exercise made it possible to know the degree of training and education of ARM's employees, the efficiency of available resources and the verification of response times.

3. Biannual customer satisfaction surveys.

Customer satisfaction surveys were conducted in February and August 2021.

The purpose of this exercise is to determine the degree of satisfaction of the customers who travel along the road corridor, in different aspects such as the service provided by the Operations Control Center (Centro de Control de Operaciones, CCO), travel times, the service and attention of the staff in the road assistance services, service and waiting time at the toll booth, signaling, road cleanliness, safety perception, among others.

The concessionaire stood out mainly for the service provided by the personnel working on the road in offering repair car, tow truck and ambulance services. Likewise, the attention of the CCO, the toll booth and the safety when traveling through the concession road corridor were also highlighted.

The customers' dissatisfaction and discomfort with the travel times along the road corridor was also identified, which is reasonable due to the multiple traffic controls caused by the works in functional units three and four.



4. NPS results over 98%.

Net Promoter Score – NPS is an indicator that measures the customer’s satisfaction with the services provided.

On a scale of 1 to 10, would you recommend this service?

- 0 – 6 Detractors
- 7 – 8 Neutral
- 9 – 10 Supporters or promoters

NPS = (% Promoters) - (% Detractors)

SERVICE	2021 NPS
Repair car	99%
Inspection	98%
Light crane	99%
Heavy crane	100%
Ambulance	100%
CAE	99%

ARM's result has always exceeded **98%**.

5. Road campaigns implementation

Two macro road safety campaigns were carried out with a large deployment of officers from the Antioquia and Middle Magdalena traffic and transportation sections of the National Police.

In addition to the above, the concessionaire permanently carries out road safety campaigns, in which the concessionaire’s Operations and Social

areas participate, with the support of the Traffic and Transportation Department of the National Police.

Road safety campaigns aim to provide information and raise awareness among road travelers on various road safety issues, so that they make responsible use of the road infrastructure.

YEAR	CAMPAIGNS	SENSITIZED CUSTOMERS
2017	132	4.002
2018	172	5.107
2019	253	6.244
2020	131	3.919
2021	129	3.235

During 2020 and 2021 there was a reduction in the number of campaigns due to the difficult situation caused by the COVID-19 pandemic.

6. Six-month extension of the DITRA Agreement

The concession contract establishes that the concessionaire must sign an inter-institutional agreement with the National Police - Traffic and Transportation Directorate (*Dirección de Tránsito y Transporte, DITRA*), aimed at joining efforts to provide the logistical support required for the operation, traffic control, and compliance with the traffic and transportation regulatory regime in the road project. This agreement ended on April 13, 2021 and was extended for a term of six months until October 13, 2021.

Upon termination of the agreement, signing a new agreement was not possible due to the fact that the police unilaterally changed the specifications of the equipment to be delivered; however, negotiations are ongoing to re-sign the agreement between the parties.

7. Completion and delivery of Functional Unit 4

Delivery of the complete Functional Unit 4, 1,360 m viaduct over the Magdalena River and new roadway



Main Operational Goals for the Coming Years

Start operations in the four functional units as of September 2024

FU4: As of January 2022, start of operations of the new road, including the viaduct over the Magdalena River, two traffic circles and the ITS (intelligent transportation system equipment) for the entire corridor.

FU3: Deliver the Functional Unit with the Vapor bridge, Puerto Berrío toll, two toll stations (one in each direction), service area, control center and operations base. 49 km

FU2: Deliver functional unit, eight bridges, two underpasses, three overpasses, one traffic circle and one crosswalk. Toll in operation, 34.8 km of new construction.

FU1: Functional unit with 35.7 km of new construction, 17 bridges, one underpass, two overpasses and one crosswalk, one traffic circle, one base of operations and one toll booth in operation.



Safety First

GRI: 103-2, 403, 416-1



Data⁶

GRI: 403

OCCUPATIONAL **Registered occupational accidents**

1
(Employee)

There was a 75% decrease with respect to 2021
(4 accidents in 2020).

84
(Contractors)

There was a 22% decrease compared to 2021
(107 accidents in 2020).

Fatalities in traffic accidents

4

There was a 300% increase from 2020
(1 fatality) to 2021.

Hours of safety training

131.880

9,300% more than in 2020 (1,402 hours).

ROAD. Recorded injuries

116

There was an 87% increase compared to 2020 (62) *.

ROAD. Traffic accidents

89

There was a 68% increase compared to 2020 (53) *.

COVID-19 rapid antibody tests

1.196

tests as of 2021.

Employee and contractor fatalities

No fatalities have occurred during the
execution of the concession project.

Deaths by COVID-19

No COVID-19 deaths have occurred
during the health crisis.

* The above increases were primarily due to increased traffic (30%) in 2021 over 2020 due to pandemic conditions.

6 All figures are as of the end of 2021.

Occupational Health and Safety Management System

GRI: 103-2, 403-1

Safety is ARM's priority. Through the company's comprehensive management approach, it commits to continuously improve safety conditions for customers and employees. It also strives to promote, together with regulatory agencies, a culture of safety among contractors and the communities it serves.

The Safety Management System optimizes globally and simultaneously:

- The quality of infrastructure and equipment.
- The nature of corporate culture and the behavior of employees and contractors.

- The care of customers, contractors, and employees.
- The clarity and importance of signage.
- The rapid response of first aid personnel.
- The speed and conditions in which customers can use the infrastructure.

Complying with the Safety First pillar, ARM has policies with specific objectives and goals:

POLICY GUIDELINE	OBJECTIVE
Comply with the legislation in force, with the requirements of the operation, of the interested parties and others subscribed by the organization.	Identifying the legal, regulatory, and contractual requirements applicable to the operation, defining actions to ensure compliance.
Generate strategies for preventing, promoting, protecting, evaluating, assessing, and controlling the risks identified and associated with accidents and incidents, as well as occupational diseases.	Ensuring the physical, mental, and social well-being of employees and other personnel involved in the operation.
Preventing or controlling environmental impacts identified by the organization, promoting efficient management in the proper handling of renewable and non-renewable resources used in the company's internal processes, in order to ensure environmental protection and mitigate pollution.	Ensuring the protection of the environment, controlling the environmental impacts generated by the organization.
Stakeholder satisfaction, based on continuous improvement processes and the effectiveness of the Integrated Management System.	Maintaining and continuously improving the company's integrated management system.

The development of the above consists of a logical, step-by-step process based on continuous improvement.

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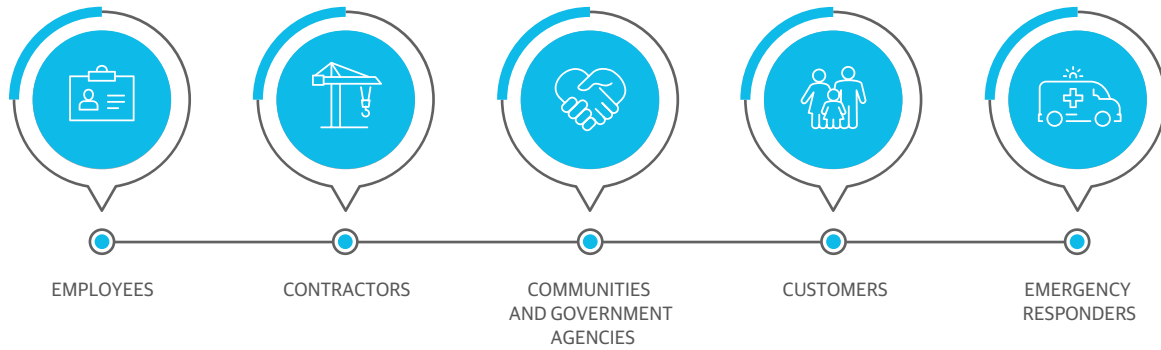
During 2021, ARM consolidated its Occupational Health and Safety strategy, which will allow the company to operate in a responsible manner, avoiding risks for employees, contractors, and customers, as well as ensuring the sustainability of the project. Together with the control entities and contractors, ARM is creating a culture of safety and good practices in its operation.

During 2021, ARM has focused its efforts on promoting all the projects contained in the **Annual Work Plan**, aimed at each of its identified stakeholders.

After several audits and evaluations of the OHSMS, there is an evident progress from 2015, when the company was in a reactive status, to date, where it has reached the status of supervision and independence. There is a road ahead, and it is being traveled jointly throughout the organization, through the annual work plans and what is envisaged in the **Business Plan**.

The company's stakeholders have always been taken into account in the Safety strategy:

Stakeholders



The following programs and initiatives have been developed for each of the company's stakeholders:





-EMPLOYEES:

Near Miss⁷: The program has been promoted throughout 2021, where ARM has reported 102 Near Misses, which were managed with their respective action plan for resolution.

The main objective of this project is to internalize the identification of unsafe acts and conditions, which, if not solved, in the future could materialize in an incident or accident at work.

The Near Miss project has been implemented through the digital platform **ALEATICA Safety Reporting (ASR)**. For the implementation of this platform, two modalities have been proposed:

Standard Near Miss

Unsafe practices and conditions of occupational safety. Launched in November 2020.



NEAR MISS QR

COVID-19 Near Miss

Unsafe practices and conditions related to COVID-19 transmission prevention. Near Miss COVID-19 has been very novel and unique as it allows to identify health-related actions and conditions to reduce the risk of COVID-19 infection. This Near Miss modality was launched in June 2020.

**COVID-19
NEAR MISS QR**



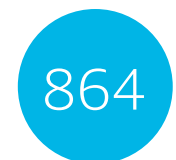
Throughout the pandemic, no reports have been filed on the platform at ARM. During this time, ARM has complied with the following:

1. Constant monitoring of human resources in the different areas to prevent COVID-19.
2. Cleaning and sanitizing equipment, vehicles, and administrative offices.
3. Providing sufficient supplies to contain COVID-19, (alcohol, hand sanitizer, antibacterial gel, among others).
4. Safety talks focused on COVID-19.
5. Hand-washing supplies, water, soap, and disposable towels in restrooms.
6. Providing face masks.

Job Hazard Assessment (JHA): The program was launched in 2021, and to date it continues to reinforce the importance of identifying risks and hazards during project activities.

JHA is, together with Near Miss, ARM's most important employee-oriented program. The JHA project is mainly based on safety training on risks and daily activities.

During 2021, the project was developed according to the programmed activities, prioritizing the operation and maintenance personnel.



⁷ Near Miss is defined by the National Safety Council as an unplanned event that did not result in injury, illness, or damage, but had the potential to cause injury, illness, or damage.



-CLIENTS / CUSTOMERS:

Accident Reduction Program (PRA): During 2021 ARM implemented PRA measures. Many efforts have been made to move forward with planned infrastructure investments in the same year.

The main activities conducted in infrastructure were intervening in the pavement structure, correcting curves, reducing slopes, building third climbing lanes, installing vertical signs, installing warning strips and delineator posts. The objective is to provide safer journeys that guarantee customers' comfort. Likewise, the National Police provided support with matters related to customers through an agreement in force until mid-October, carrying out road safety campaigns, as well as speed and alcohol controls. Customer satisfaction surveys were conducted, radio spots were broadcasted, and quarterly bulletins and road safety flyers were issued.



-CONTRACTORS:

- **Mandatory Safety Requirements:** The Safety Control Group ensures that all contractors, from their procurement process to project execution, comply with all safety requirements.

- **Safety contract clauses:** Assurance of contractual clauses for all contractors.

For 2022, **the biannual meetings with contractors will be resumed**, with the aim of continuing to communicate ARM's strategy-vision on Safety issues and inviting them to be part of this path, joining the company's projects.



-FIRST RESPONDERS:

- On October 13, 2021, the inter-institutional agreement with the National Police, which had been in place since 2015, was terminated. Through this agreement, they provided assistance in traffic accidents and other road events, as well as conducting road safety campaigns and speed and alcohol controls, among other activities. Currently, efforts are being made to enter into a new agreement.
- On December 29, 2021, an agreement was signed with the Puerto Berrío Volunteer Fire Department, the purpose of which is to join efforts and specially to support the Fire Department in performing their activities, so that they can continue supporting the community, ARM, and customers during emergencies such as forest fires, accidents, floods, rescue services, as well as handling incidents with hazardous materials, among other activities.



-COMMUNITIES AND GOVERNMENT AGENCIES:

- ARM provides road safety training for the communities surrounding its roadways, with the aim of reducing accident rates, contributing to the reduction of human and material losses caused by traffic accidents, and strengthening citizen culture in relation to the safe and comfortable use of road infrastructure. In coordination with the Public Employment Agency (*Agencia Pública de Empleo, APE-SENA*), training processes on Occupational Health and Safety are being carried out for all personnel involved in the project.
- ARM relies on the continuous support and advice of ARL SURA (Labor Risk Management) for all issues related to the prevention and promotion of occupational health and safety.

ARM has an **Integrated Management System (IMS)**, based on the international reference standards NTC ISO 9001:2015, NTC ISO 14001:2015, NTC ISO 45001:2018, which allows for the company to be evaluated with objective criteria that have been previously established.

There is an equal relationship between the requirements, elements, and policies of the aforementioned systems. They have been combined into a single Integrated Management System with a process-based approach to develop assigned functions and ensure the integrated management of activities during all stages of the contract. The three levels of processes, Mission, Operational and Support, along with the procedures, constitute one of the planning tools that describe what the company does and how it performs its functions and activities.

All these processes and their procedures are compiled in the IMS Manual, which is approved by ARM's CEO. In addition to being a reference document, this manual and its system are intended to:

- 1 Evidence to customers/clients, the philosophy and methodology implemented to achieve and maintain the desired safety, quality, and environmental objectives.
- 2 Gather in a single document all the criteria, procedures, etc., that allow for the proper functioning of the company's quality, environmental and occupational risk prevention management.
- 3 Provide a basic objective reference for the performance of audits.
- 4 Provide basic documentation for the training of own and outsourced personnel.

As a result of the above, the **Occupational Health and Safety Management System (OHSMS)**, is implemented. ARM complies in Colombia with the requirements established in Law 1562 of 2012, Decree 1072 of May 26, 2015, Resolution 0312 of 2019 of the Ministry of Labor and other regulations in force. The OHSMS aims to structure the joint action between ARM and its employees in implementing Occupational Health and Safety (OHS) measures, through continuously improving working conditions and work environment, and the effective control of hazards and risks in the workplace.



... aims to structure the **the joint action between ARM and its employees** in implementing Occupational Health and Safety (OHS) measures...

Integrated Safety, Occupational Health, Environment and Quality Management Policy

ARM is a concessionaire company dedicated to providing maintenance and operation services for the licensed road under the concession contract. It strives to continuously improve processes, reduce possible socio-environmental impacts, and comply with applicable legal requirements. It also strives to meet its stakeholders' legitimate expectations based on continuous improvement processes and the effectiveness of the Integrated Management System, always taking into account the context of the organization, and guaranteeing the necessary resources.

To this end, ARM is committed to:

- Generating strategies for preventing, promoting, protecting, evaluating, assessing, and controlling the risks identified and associated with accidents and incidents, occupational diseases, property damage, deterioration, or affectations of occupational and organizational origin, for employees, contractors, subcontractors, suppliers, visitors, internal and external customers/clients, community in general and others who are potentially at risk.
- Preventing or controlling the environmental impacts identified by the organization, promoting efficient management in the proper handling of renewable and non-renewable resources used in the company's internal processes, in order to ensure environmental protection and mitigate pollution.
- Complying with current legislation, operational requirements, stakeholder expectations and other requirements to which the organization is committed.
- Striving for continuous improvement in all processes and the integral management system to achieve high levels of performance that guarantee the fulfillment of service for the continuity of the business, following quality, environmental, safety and occupational health standards.

Complementing the above policy, additional policies have been developed to help meet the IMS objectives.

Alcohol, Tobacco, and Psychoactive Substances Prevention Policy

ARM reaffirms its commitment to the health and safety of employees, suppliers, contractors, subcontractors, visitors, and other interested parties, taking the necessary measures to prevent and avoid the possession, consumption, distribution, dispensing and/or sale of alcoholic beverages, smoking and psychoactive substances or drugs within the company's facilities or in the operational areas during working hours.

Road Safety Policy

ARM is committed to establishing activities to promote and prevent accidents and near misses in operational areas, in the company's facilities and on public roads. All contractors, subcontractors and own personnel provided with company or third party vehicles to execute their daily work, are responsible for participating in the various activities developed by the company in order to reduce chances of an accident that may affect the physical, mental, and social integrity of employees, contractors, subcontractors, the community in general, private property, equipment, and the environment. It is also committed to complying with the existing applicable regulations regarding road safety (Resolution 1565 of 2014 and other applicable ones).

Workplace Harassment Prevention Policy

ARM is aware of the importance of establishing mechanisms to prevent and mediate harassment at work. For this reason, the Labor Coexistence Committee has been created, and together with all the company's employees, will establish activities aimed at generating a collective awareness of healthy coexistence, which promotes work in dignified and fair conditions; harmony among those who share the company's work life and a good environment in the company, as well as protecting the privacy, honor, mental health, and freedom of people at work.

Legal and other requirements

The internal web tool *Isolución* keeps the legal requirements applicable to the activity being carried out up to date.

Identifying applicable legal requirements is a reference point. ARM monitors and measures compliance with them through internal controls and follow-up audits. Through policies, ARM ensures compliance with legal requirements associated with its processes and others generated by its customers, products and/or activities.

In order to permanently identify, evaluate compliance and define the sources of access and consultation of the legal requirements applicable to Occupational Health and Safety, environment and quality, ARM has established a procedure for the identification and evaluation of the Legal Requirements Matrix, based on the required activities.

Management Programs

In order to comply with the policies and objectives of the OHSMS, the following management programs were created:

- Mechanical Risk
- Road Safety Management
- Prevention and Protection Against Falls from Heights
- Order and Cleanliness
- Inspections
- Induction and Training
- Healthy Habits, Lifestyles and Work Styles
- Epidemiological Surveillance
- Reinstatement and Labor Reincorporation
- Industrial Safety
- Preventive and Corrective Maintenance of Vehicles, Machinery, and Equipment
- Behavior-based Safety

IMS Governance

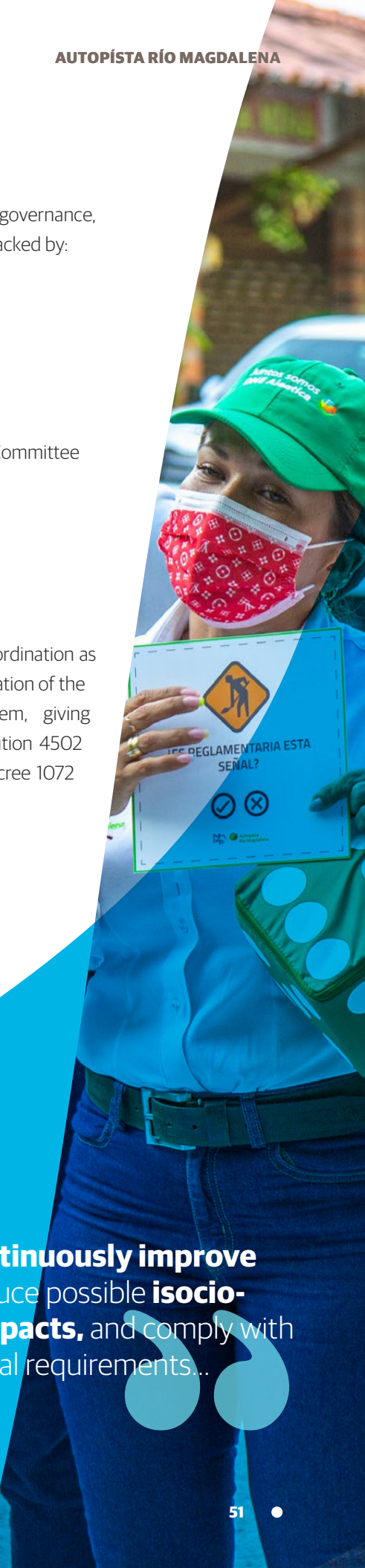
Management is responsible for the IMS governance, supported by the Head of Sustainability, backed by:

- OHS Coordination
- IMS Coordinator
- Environmental Prevention Specialist
- SISOMA⁸ Inspectors
- Joint Occupational Safety and Health Committee
- Coexistence Committee
- Emergency Brigades Internal Auditors
- External Auditors
- External Advisors

The management appointed the OSH Coordination as responsible for the design and implementation of the Occupational Health and Safety System, giving compliance with the provisions of Resolution 4502 of 2012, Resolution 0312 of 2019 and Decree 1072 of 2015.

... **strives to continuously improve processes,** reduce possible **isocio-environmental impacts,** and comply with applicable legal requirements...

⁸ Industrial Safety, Occupational Health, and Environment.





Hazard Identification, Risk Assessment, and Incident Investigation

GRI: 403-2

ARM identifies the hazards associated with the activities performed and evaluates the risks for each job position, in accordance with a methodology for this purpose. Based on the results of the assessment, it establishes the necessary measures and controls to minimize any risk to the safety and health of workers.

The general purpose of ARM's hazard identification, evaluation and assessment of occupational health and safety risks is to identify and understand the hazards that can be generated when carrying out activities, as well as the exposure to which personnel are subjected, so that the company can establish the necessary controls.

The current version of the Colombian Technical Guide GTC 45 is used as a methodology for Hazard Identification and Risk Assessment. In addition, several bibliographic sources are available, including guides, standards, and the principles of the NTC ISO 45001 - 9001 - 14001 standards.

The risk assessment is communicated to employees and reviewed in the event of significant changes in the activities carried out or

in legal requirements and other applicable requisites. Prevention and control measures against hazards and risks are put in place by means of:

- Safe work analysis of non-routine and routine activities.
- Work permits for high-risk activities.
- Integrated Management System compliance audits.
- Emergency plan.
- Management indicators.
- Organizational context analysis.
- OHSMS initial evaluation.
- JHA program implementation.

ARM established the Hazard Identification, Risk Assessment, Controls Determination and Evaluation Procedure, which applies to all areas, processes, routine, and non-routine activities of the organization. The following is the general outline of the procedure:



From the above procedure, the **Hazard Identification and Risk Assessment Matrix** is obtained showing control determination and evaluation for the routine and non-routine activities identified in the project.

To investigate labor incidents, the company has the **Procedure for Investigating Labor, Environmental and Traffic Incidents, Accidents, and Illnesses**. It seeks mainly to establish a procedure for the notification, reporting and investigation of these incidents, in order to identify, analyze the facts and define the set of causes that directly or indirectly intervened in the incident, accident and occupational illness, to prioritize and apply corrective and preventive actions, aimed at eliminating or minimizing the risk conditions and improving the quality of life of workers and productivity.

In 2021, the use of the **ALEATICA Safety Reporting (ASR)**, global platform was consolidated, through which all accidents and incidents are recorded, facilitating the investigation and identification of the root cause of incidents and accidents in order

to propose corrective measures to address, follow up and close the incident.

During 2021, the initiative to communicate lessons learned has been maintained. In that year, there was only one occupational accident, from which the following health and safety lessons learned were obtained:

- Lesson 1: Never handle or lift elements without authorization.
- Lesson 2: Use PPE rigorously.
- Lesson 3: Immediately report any eventuality while on the road.

Occupational Health Services

GRI: 403-3

Health Conditions Diagnosis

By means of occupational medical examinations, combined with the report of absenteeism due to sick leave, accidents and work-related illnesses, employees' health conditions are diagnosed.

Through the Health Service Provider Institution (*Institución Prestadora de Servicios de Salud, IPS*), health condition diagnoses are available, which include the characterization of health conditions, the evaluation and analysis of employee health statistics, both of occupational and common origin, and the results of occupational medical evaluations.

Occupational Medical Examinations

Occupational medical examinations are medical evaluations that determine the physical, mental, and social health conditions of the employee in the process of joining the company, based on the working conditions to which they would be exposed, according to job requirements and position profile. Medical examinations are carried out in accordance with the occupational programs⁹ established for each position and according to the matrix for hazard identification and risk assessment.

Pre-entry, periodic, exit and post-sick leave occupational medical examinations are performed for personnel in administrative positions, personnel with operational contracts and other modalities. For such personnel, the OHS and HR area is in charge of performing occupational medical examinations. Contractors are responsible for their own medical examinations, though the OHS area must verify compliance.

The medical-occupational evaluations are performed by an IPS, complying with current national regulations. The OHS area provides the physician with the job profiles for direct personnel, along with the description of the tasks and the environment in which the job will be performed, with the objective of identifying the hazards/risks to which the employee may be exposed. Evaluations, restrictions, and medical recommendations are communicated in writing to the worker, allowing the job to be adjusted or the worker to be relocated or retrained when necessary. The IPS is in charge of safeguarding medical records.

ARM ensures the performance of entry, periodic and exit occupational medical examinations in relation to occupational health conditions, as per Resolution 2346 of July 11, 2007, and other applicable regulations, whereby the practice of occupational medical evaluations and the management and content of occupational medical records are regulated. The IPSs themselves are in charge of keeping ARM's personnel medical records.

ARL SURA (Labor Risk Management) supports the development and implementation of the occupational medicine and occupational health and safety programs, which is provided by a physician specialized in occupational health and safety. As part of the preventive medicine programs, when a health history is identified in the occupational medical evaluations, the worker participates in such programs and is follow-up on.

⁹ The job description is a technical-administrative document that organizes the interrelation, interaction, and interdependence of a job position from three points of view: Human Talent Management, Occupational Safety and Occupational Health, in which the aptitudes and capacities of the existing job positions and those of the employees are summarized.

Employee Participation, Consultation and Communication on Occupational Health and Safety

GRI: 403-4

ARM has established a communication matrix by process, which determines the mechanisms to receive, document and adequately respond to internal and external communications related to the Occupational Health and Safety Management System, ensuring that employees and contractors are made aware of the system. It also makes sure there are channels to collect concerns, ideas, and contributions from employees regarding Occupational Health and Safety, so that they can be considered and addressed by managers in the organization.

The following are the participation and consultation mechanisms defined by the organization::

a) Joint Committee on Occupational Health and Safety (Comité Paritario en Seguridad y Salud en el Trabajo, COPASST)

The Organization, in compliance with Decree 1072 of 2015 and Resolution 2013 of 1986 of the Ministry of Health and Social Protection and the Ministry of Labor, has a Joint Committee on

Occupational Health and Safety (COPASST), whose functions include conducting accident investigations, participating in internal audits, review of policies, annual work plan, schedule, budget or resource allocation, inspections in the different areas, and evaluation of the impact of activities on people's safety. This committee meets periodically to follow up on the actions determined by each of the work fronts, allowing for an adequate working environment to comply with the objectives of the IMS. Mandatory rules and inductions have been established for visitors and contractors prior to any work scheduling, in accordance with the Contractor Control Manual.

ARM has adopted effective measures to ensure the participation of all employees and their representatives before the Joint Committee, through the allocation of time and other necessary resources, in accordance with current regulations. Employees, contractors, and their representatives before the Joint Occupational Health and Safety Committee are informed about legal and other requirements and the development of all stages of the OHSMS. Recommendations made by the COPASST for the improvement of the OHSMS are also evaluated.



b) Labor Coexistence Committee (*Comité de Convivencia Laboral, LCC*)

In accordance with the provisions of Resolution 2646 of 2008 of the Ministry of Social Protection, Law 1010 of 2006, Decree 1072 of 2015, the coexistence committee has been established, which determines the mechanisms for the resolution of internal conflicts of alleged complaints of workplace harassment.

c) Road Safety Committee

The Road Safety Committee manages all aspects of the **Strategic Road Safety Plan (Plan Estratégico de Seguridad Vial, PESV)** under the guidelines set forth in Law 1503 of 2011 and Decree 2851 of 2013, and is the strategic participatory scenario where the pillars set forth in the legislation are developed:

1. Strengthening institutional management: Complying with the policies and guidelines for occupational road safety established in this Strategic Safety Plan, implementing the activities defined in the action schedule for road safety.
2. Human behavior: Developing educational actions that contribute to the promotion of safe habits, behaviors and conduct on the road and establish the necessary controls in terms of road safety for employees, contractors and third parties working for the organization.
3. Safe infrastructure: Establishing preventive measures on internal and external roads related to the company's own activities.
4. Safe vehicles: Developing control and follow-up actions for the maintenance and good condition of the company's fleet.
5. Attention to victims: Improving preparedness for traffic events involving any vehicle related to the company.

d) Near Miss Program

The Near Miss program is managed and implemented through the ASR platform. This reporting process is part of one of the mechanisms for employee participation in the OHSMS.

In addition, employees have access to the OHSMS through the following mechanisms:

1. *Isolución* Platform
2. Informative billboards
3. Corporate mailings
4. WhatsApp groups
5. Corporate induction and re-induction
6. Participation in the integrated management week
7. Participation in OHSMS training activities.
8. Near Miss report
9. Surveys focused on occupational medicine programs and hazard identification and risk assessment.

Complementing all of the above, ARM enacted the **Communication, Participation, Consultation and Awareness Procedure**, which establishes the mechanisms to ensure that the IMS information reaches employees, contractors, and other interested parties in a clear, timely and concise manner. The aim is to obtain the expected results with its dissemination, control the flow of internal and external communications related to the IMS between the different levels and roles within the company, as well as to receive, record and respond to the concerns of interested parties and thus, keep track of how they are managed.

Occupational Health and Safety Training for Employees

GRI: 403-5

The OHSMS implementation process includes an **Induction and Training Program**, where guidelines are established to direct new employees' activities. This process guarantees the necessary knowledge in quality, occupational health and safety, environment, and the Strategic Road Safety Plan, contributing to the improvement of the Integrated Management System.

Employees training in occupational health and safety is also guaranteed, based on hazard identification, work-related risk assessment and evaluation, and the company's characteristics. Therefore, through the OHSMS, the company implements and develops activities to prevent work-related accidents and occupational diseases, as well as to promote health, according to current regulations.

During 2021, in addition to inductions and re-inductions for new personnel, training was provided on the following topics:

1. JHA program (hazard and risk identification)
2. Near Miss Program (reporting of unsafe actions and conditions)
3. Behavior-based safety program
4. Emergency brigades
5. Psychosocial Risk
6. Chemical product handling, labeling and safety data sheets
7. Mechanical Risk (tool and equipment handling and manipulation)
8. High risk tasks (work at heights, confined space, and dangerous energies)
9. Strategic Road Safety Plan
10. Biomechanical risk (active breaks, load handling, postural hygiene)
11. Waste sorting and proper management
12. COPASST
13. Coexistence Committee
14. Importance and use of PPE
15. Epidemiological Surveillance Programs, among others

The training schedule is tracked and monitored through *Isolución*. This software establishes the topics, divided by program, related to the trainings conducted during the year.

The ARL supports the company with training and specialized OHSMS courses as part of its obligations under the current regulations of the General Occupational Hazard System.

¹⁰ Including training hours for contractors (safety training hours).

During 2021, training hours were as follows:



There is a significant increase in training hours compared to 2020, mainly due to the reactivation process and the termination of the health restrictions imposed as a result of the pandemic.



... through the OHSMS, the company implements and develops **activities to prevent work-related accidents and occupational diseases**, as well as to promote health...

... **the Healthy Habits, Lifestyles and Work Styles**, which seeks to promote healthy lifestyles among the working population, is being developed...

Employee Health Promotions

GRI: 403-6

Every single employee is affiliated to Colombia's social security system, which mainly includes healthcare services through an EPS, access to the retirement system, and ARL coverage. As mandated, the EPSs carry out preventive health activities in relation to common diseases, and the ARL, in work-related issues. ARM supervises that the contractor companies, their personnel and third party contractors comply with the affiliation and payments to the Occupational Health and Safety System so that the activities performed for ARM are covered and in compliance with the legal regulations in force in Colombia.

ARM guarantees that each employee can access their EPS and ARL services when required. Additionally, the **Healthy Habits, Lifestyles and Work Styles Program**, is being developed, seeking to promote healthy lifestyles among the working population, implementing specific health promotion and prevention actions

aimed at reducing the prevalence of chronic non-communicable diseases, cardiovascular, musculoskeletal, digestive, and mental pathologies. Likewise, it encourages physical activity, healthy dietary habits, and psychosocial wellbeing, promoting employee's empowerment towards a self-care culture.

As a result of the health emergency decreed by the national government as a consequence of the COVID-19 pandemic, self-care culture is encouraged through healthy habits in order to minimize the probability of becoming infected by the SARS-Cov2 virus leading to the COVID-19 disease. To this end, an action protocol for preventing transmission was established, setting out all the mitigation measures to prevent the spread of the virus among the working population. ARM also ensures that all contractor companies have this protocol in place and constantly monitors it. A weekly report summarizing the implementation of the protocol is issued on a general basis.

¹¹ EPS: Health Promoting Entities (*Entidades Promotoras de Salud, EPS*) are responsible for enrolling and registering members and collecting their health contributions. Their basic function is to organize and guarantee the provision of the Basic Health Plan (*Plan Básico de Salud, PBS*).

Safety for Customers

GRI: 403-7

For Global Safety Management, 2021 has been a key year for strengthening the **Accident Reduction Programs (Programas de Reducción de Accidentes, PRA)**, which establish the Road Safety strategy for the 2020-2024 period. These programs treat the accident rate as an integrated element made up of three factors identified as the main precursors of an accident: Road Factor, Customer Factor and Vehicle Factor.

With the above, ARM joins the accident reduction commitment of the **"Decade of Action for Road Safety 2021 - 2030"**, adopted in the General Assembly of the United Nations (UN) and recently renewed for a further 10 years in August 2020. The company also adheres to the principles of the National Road Safety Plan 2011 - 2021 (currently being updated), associated with the downward trends in the number of fatalities, serious injuries, motorcyclists, pedestrians, and victims of alcohol-impaired driving.

*Investments under the PRA (2020-2024) amount to approximately **billion Colombian pesos**. As of the end of 2021, approximately **billion Colombian pesos** have been invested, marking a **42%** progress in the total cumulative investments contemplated in the PRA.*

As part of the activities carried out in ARM, interventions in both the geometry and structure of the road, such as deep interventions in the pavement and correction of curves, reduction of slopes and construction of third climbing lanes, with the objective of providing safe routes that guarantee customer comfort, stand out.

In addition, ARM contributes to sustainability, since a well-maintained road helps to reduce emissions from the vehicles traveling on it. It also allows equipment and signaling systems on the infrastructures to be increased, replaced, and improved.

The Global Technical Department is supported by the **Planning, Risk and Reporting Department** together with the **Control and Technical Support Department** within the **Operations Department**. With this structure, the infrastructure service quality is guaranteed throughout its life, from the initial investment stage, through the operation phase, to the final stage, when the infrastructure is returned to the grantor under the minimum conditions established in the concession contract.

Since 2020, through the Operations Department, the actions to meet the goal of reducing the number and severity of road accidents have been transmitted and led by the Operations Department, for which the PRA accident reduction program was established. Subsequently, the Operations Management, supported by the Road Safety Coordination, created the document, and established the methodology to be followed in order to comply with the objectives set forth therein. Finally, the Road Safety Coordination Department executes and monitors both the activities and the budget to achieve the objectives and goals defined in the PRA.

To this end, the Global Technical Department provides support in the preparation and follow-up of planning and economic control processes, as well as in the management of the technical risks associated with the activities of the operating and investment companies, relying on a multidisciplinary team of specialists that coordinates and supports the implementation of the most relevant technical projects within the Business Units.

Safety is a priority for ARM. The main objective is to achieve excellence in safety and thus become a benchmark for both customers and employees, always based on operational excellence.

The pillars of Security, Customer Service and Sustainability are continuously present in all phases of ARM's infrastructure, from engineering to operations.

Throughout 2021, major works continued to be executed for companies in the investment phase, while companies in the

operating phase continued to carry out the maintenance work included in the long-term conservation plans for each of the roads.

ARM's objectives include ensuring, from the investment phase, compliance with and monitoring of the contractual indicators, once the operation has begun and throughout the life of the Business Unit, with the least possible impact on the customers.

The company has collaborated with different Business Units in the implementation process of the Toll Road Management System, through data entry and metrics calculation, contributing to indicator compliance and monitoring.

The following measures have been taken to increase the safety and quality of future service:

- Improving initial designs by modifying geometry, radii of curvature, camber, etc.
- Increasing safety factors considered in the original designs.
- Updating the type of lighting to more environmentally sustainable systems.

During the bidding processes, the technical evaluation is very important in the final choice of each bidder, with the aim of achieving optimal quality of the final infrastructure. In those bidding processes where safety is relevant due to the nature of the works to be executed, the safety strategy and approach have been considered as an important element for the final qualification of the bidder.

Regular multidisciplinary meetings have been held, in which the Technical and Safety areas are present since the company is directly responsible for providing customers and employees with a safe and efficient transport service.

Each action carried out by the Major Maintenance Department is intrinsically aimed at improving the service provided to customers, as well as reinforcing safety. ARM performs periodic inspections and maintenance of all the elements of the road, as well as studies of all assets in order to prevent, optimize and improve the roads.

Road Safety Strategy

In order to reduce the accident rate and ensure greater road safety, the company has set its strategy within the framework of an accident reduction program (PRA), consisting of the following:

Roadway Factor

Infrastructure is the most relevant factor regarding the total investment in 2021. Most of the investments directed to the road factor were made within the framework of EPC¹² contracts to renovate the road infrastructure. In order to have an internal and external vision, the support of external consultancies such as the one hired for the iRAP¹³ studies, the results of which were delivered during the last quarter of the year, will be essential.

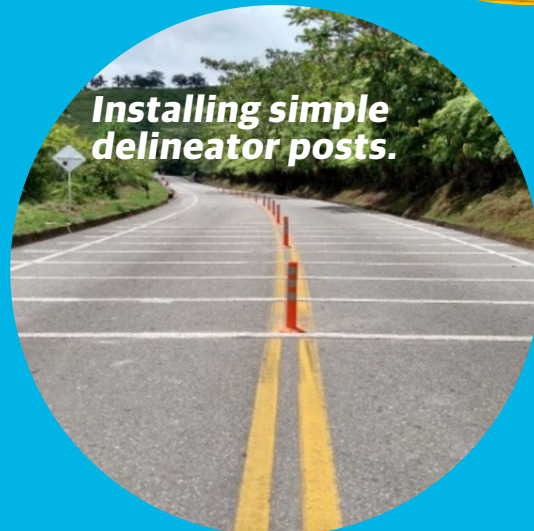
12 Engineering, Procurement and Construction. A highly specialized type of contract generally used in the construction industry.

13 iRAP (International Road Assessment Programme) is an independent consulting firm that issues an opinion on the road safety status of the roads they analyze. They rate the roads in a range of 1 to 5 stars (1 being the lowest value and 5 the highest value) and analyze different issues such as containment systems, sound barriers, road design, operating speeds, among others.

The actions and initiatives that have increased safety standards include the installation of transversal warning strips, vertical signaling, shock absorbers in the toll zone, paving, correction of

curves, reduction of slopes and construction of third climbing lanes, among the most representative.

Some examples of what was done in 2021 in terms of investments are:



Customer and Vehicle Factor

Focusing on the customer and the vehicle is essential to rigorously execute the Accident Reduction Program, to address customer error in driving, to improve vehicle fleet maintenance and to reduce customer accidents.

During 2021, the following activities were implemented:

- Road safety campaigns targeting different road stakeholders and with different topics.
- On-road information campaigns using variable messaging panels (VMP).
- Police controls (documentation, speed, and alcohol-impaired driving).
- Accident investigation with virtual reconstruction of serious and/or fatal accidents.

Some examples of what was done in 2021 are:



Implementing variable messaging panel.



Customer speed control.



Customer alcohol intoxication control.



Quarterly Operation Bulletins.



Traffic accident reconstruction.



Customer satisfaction survey application.



In 2021, the number of road accidents and incidents in ARM was:

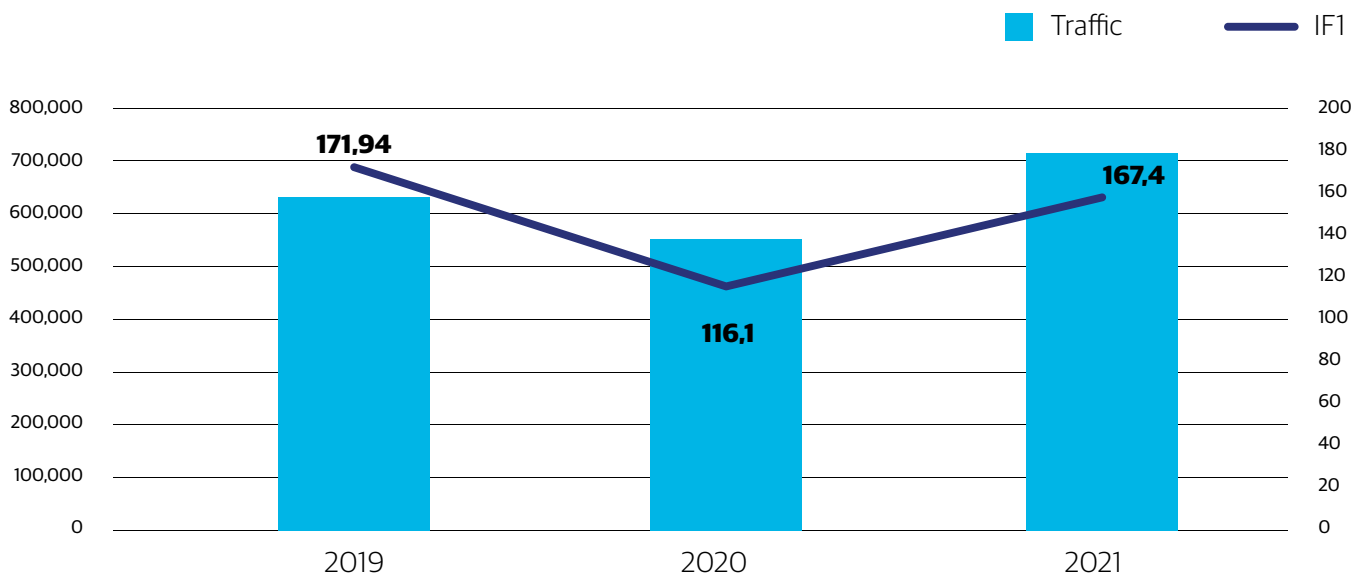
89
Road accidents

73
Road incidents

Accidents with casualties: IF1

This indicator describes the number of customer accidents with casualties per 100 million veh - km.

An increase in this KPI is evident for 2021 compared to 2020, due to the increase in traffic, as well as in accident rates, due to the lifting of pandemic-related mobility restrictions.



Road Safety Campaigns

Road safety campaigns are aimed at providing information and raising awareness among customers on various road safety issues, so that they make responsible use of the road infrastructure.

The company's Operations and Social areas are involved in these activities, supported by the National Police's Traffic and Transportation Directorate.



During 2020 and 2021, campaigns were reduced due to the challenging conditions brought about by COVID-19.



Employees Covered by a Health and Safety Management System

GRI: 403-8

The IMS ensures that all employees of the organization are covered 100% within the OHSMS. To this end, there is an **Internal Audit Procedure**, which defines the methodology for planning and executing audits to evaluate the implementation and effectiveness of the IMS. Compliance with the OHSMS is verified annually through internal audits.

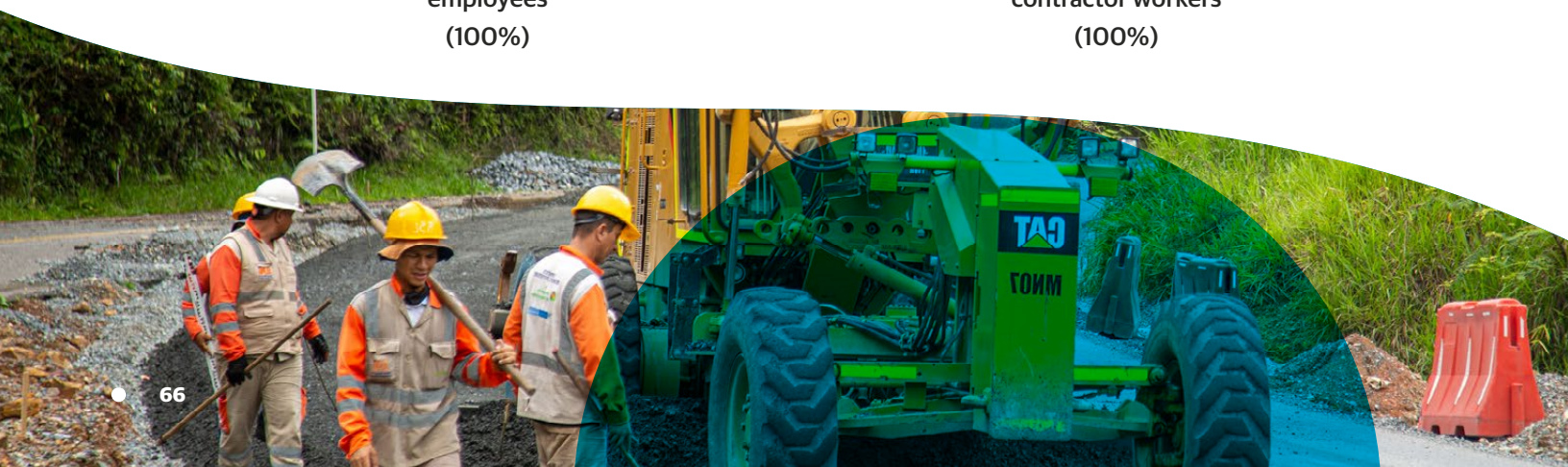
ARM monitors all contractor activities through the OHSMS, seeking to ensure compliance with the safety and health standards

established for the project. When entering into a contractual relationship, obligations are defined to ensure compliance with regulations through the signing of a safety clause that requires each contractor to be responsible for the safety and health of its workers. Consequently, the company performs monitoring and supervision activities in the field in order to ensure compliance with regulatory requirements and procedures established in the OHSMS and compliance with the minimum standards in accordance with Resolution 312 of 2019 of the Ministry of Labor.

Employees and non-employees whose work or workplace is controlled by the organization and who are covered by the occupational health and safety management system:

164
employees
(100%)

2.528
contractor workers
(100%)



Work-related Injuries

GRI: 403-9

During 2021, there was one incident associated with superficial injuries to the face, which resulted in seven days of sick leave.

Between 2020 and 2021, the accident rate was reduced by a significant 80%. During 2020, there were four occupational accidents and in 2021, there was only one, which represents a decrease of three events from 2020 to 2021.

For each event there is an investigation, analysis of causes and an action plan with lessons learned, as per the Procedure for the Investigation of Incidents, Accidents and Occupational, Environmental and Traffic Illnesses.

Concerning contractor companies, during 2021 there were 84 events, resulting in 635 days of sick leave, associated with the following causes: falling objects, people falling, wounds, superficial

trauma, struck by, eye irritation, lumbar pain and struck against, among others.

A 21% reduction in the accident rate is observed when comparing the year 2021 and 2020, since in 2020 there were 107 accidents. Regarding the sick leave days, there was an increase of 7%, since in 2020 there were 589 events and in 2021 there were 635 sick leave days. As a result of the above, the contractors are implementing the respective action plan and increasing controls for the prevention of occupational accidents.

- Number of work-related incidents that could have had serious consequences identified: 0
- Number of near misses identified: 0

EMPLOYEES OR NON-ARM'S EMPLOYEES (OUTSOURCED)	NUMBER OF WORKED HOURS	NUMBER OF FATALITIES RESULTING FROM AN OCCUPATIONAL ACCIDENT INJURY	NUMBER OF OCCUPATIONAL INJURIES WITH MAJOR CONSEQUENCES (EXCLUDING FATALITIES)	NUMBER OF RECORDABLE OCCUPATIONAL INJURIES
For all EMPLOYEES	434.911	0	0	1
For all WORKERS WHO ARE NOT EMPLOYEES, but whose jobs or workplaces are controlled by the organization	6.378.574	0	0	84

EMPLOYEES OR WORKERS WHO ARE NOT EMPLOYEES	RATE OF FATALITIES RESULTING FROM AN OCCUPATIONAL INJURY (CALCULATED ON THE BASIS OF 200,000 HOURS WORKED)	RATE OF INJURIES DUE TO OCCUPATIONAL ACCIDENTS WITH MAJOR CONSEQUENCES (EXCLUDING FATALITIES AND CALCULATED ON THE BASIS OF 200,000 HOURS WORKED)	RATE OF RECORDABLE OCCUPATIONAL INJURIES (CALCULATED ON THE BASIS OF 200,000 HOURS WORKED)
For all EMPLOYEES	0,00	0,00	0,46
For all WORKERS WHO ARE NOT EMPLOYEES, but whose jobs or workplaces are controlled by the organization	0,00	0,00	2,63

EMPLOYEES OR WORKERS WHO ARE NOT EMPLOYEES	RATE OF FATALITIES RESULTING FROM AN OCCUPATIONAL INJURY (CALCULATED ON THE BASIS OF 1,000,000 HOURS WORKED)	RATE OF INJURIES DUE TO OCCUPATIONAL ACCIDENTS WITH MAJOR CONSEQUENCES (EXCLUDING FATALITIES AND CALCULATED ON THE BASIS OF 1,000,000 HOURS WORKED)	RATE OF RECORDABLE OCCUPATIONAL INJURIES (CALCULATED ON THE BASIS OF 1,000,000 HOURS WORKED)
For all EMPLOYEES	0,00	0,00	2,29
For all WORKERS WHO ARE NOT EMPLOYEES, but whose jobs or workplaces are controlled by the organization	0,00	0,00	13,17

SAFETY INDICATORS	EMPLOYEES	CONTRACTORS
Number of occupational accidents with sick leave ¹⁴	1	84
Number of days lost due to accidents with sick leave	7	635
Number of accumulated working hours	434.911	6.378.574
Number of employees or contractors	164	2.528
Incidence rate (LTIIR, Lost Time Injury Incidence Rate) ¹⁵	0,64	3,32
Injury Severity Rate (LTISR, Lost Time Injury Severity Rate) ¹⁶	0,02	0,10
Frequency rate ¹⁷ (LTIFR, Lost Time Injury Frequency Rate) on the basis of 200,000 hours worked	0,46	2,63
Frequency rate (LTIFR, Lost Time Injury Frequency Rate) on the basis of 1,000,000 hours worked	2,30	13,17

During 2021, the event occurred to a male ARM worker (100%). In contractor companies, 94% corresponds to men and 6% to women.

¹⁴ Refers to the Lost Time Injury (LT) indicator.

¹⁵ Calculated as Lost Time Injuries (LTI) / N° of workers during the evaluation period * Factor (100: this factor is the same as the one used by ALEATICA SAU in its annual non-financial report and is intended for comparative purposes).

¹⁶ Calculated as Number of days lost due to accident with sick leave / Total accumulated working hours * Factor (1000: this factor is the same as the one used by ALEATICA SAU in its annual non-financial report and is intended for comparative purposes).

¹⁷ Calculated as Lost Time Injuries (LTI) / Total Accumulated Work Hours * Factor (200,000 or 1,000,000 Work Hours).

Occupational Illnesses

GRI: 403-10

To date, no illnesses related to the work activities of ARM employees have been reported. There is consolidated information on general health conditions identified during occupational medical evaluations, in order to follow up on the performance of their work activities.

Health and Safety Impact Assessment of Product or Service Categories

GRI: 416-1

ARM provides services related to road operation and everything linked to its proper functioning. Customers, communities, and populations neighboring the road, who are the direct beneficiaries of the company's activities, are taken into account in the processes, procedures, policies, and other guidelines previously mentioned. ARM strives to guarantee their health and safety in each of the stages where the OHSMS is planned, executed, verified, and improved.

Non-Compliance Cases Related to Health and Safety Impacts of Product or Service Categories

GRI: 416-2

ARM is a relatively new company constantly improving its processes and procedures to comply with national legislation, the concession contract and corporate mandates given by investors. It is currently in the process of preparing for certification to NTC ISO 14001:2015 and NTC ISO 45001:2018.

The preparation of this report stems from a genuine voluntary interest in complying with the multiple sustainability standards in the world, whereby ARM complies at least with the provisions of the Global Reporting Initiative (GRI). No non-compliance with national legislation, the concession contract signed with ANI, or the provisions of the GRI voluntary standards has occurred up to 2021.



... The preparation of this report stems from a genuine **voluntary interest** in complying with the multiple **sustainability standards in the world...**



Passion for the Team

GRI: 102-8, 102-35, 102-41, 103-2, 202-1, 401-1, 401-2, 401-3, 402-1, 403-9, 404-1, 405-1, 405-2



Data

GRI: 102-7

Number of employees

164

total number of employees
65 women (40%) and 99 men (60%)



Staff turnover

16%

represented by 26 personnel departures

Absenteeism rate

1%

which corresponds to 4,904 hours
of annual absenteeism

Female managers

1

1 management position is held by a woman

Executives with local nationalities

86%

of the executive staff

Parental leave

1

employee took parental leave

Full-time employees

100%

Training hours

4.251

Introduction

ARM's team of employees is of great importance to the company, as they are the backbone of the business, allowing the company to achieve its objectives, and therefore, caring for and recognizing their work is one of the company's top priorities. The company's employee well-being strategy focuses on establishing clear processes, offering development programs, and fostering motivation, as well as promoting the security and stability of each employee.

As a part of its talent management methodology, ARM has placed special interest in offering development and growth opportunities

for its team members, thus contributing to the creation of a safe and comfortable work environment.

Based on its global **Human Resources and Human Rights policies**, the company fosters an environment that promotes inclusion, diversity, respect, and non-discrimination. Likewise, it seeks to promote fair and favorable conditions for employees. Supported by leadership and the Human Resources team, ARM promotes its guiding principles and strives to comply with them.

Key Achievements

2021 was a challenging year due to the continued state of emergency, derived from the COVID 19 pandemic. Therefore, one of the company's main achievements was to maintain a full staff and their full salaries. Also, ARM managed to offer some of the employees the chance to work from home.

On the other hand, institutional benefits were safeguarded. Although there were no physical meetings, the company did reach

the homes of employees on Women's Day, Mother's Day, Father's Day, Children's Day, and Christmas Day and presented them with a gift to express gratitude for their self-care and for not lowering their guard in the face of the global crisis.

Through the protective measures implemented to prevent the spread of the SARS-CoV-2 virus, all employees were protected and constantly monitored, as a result of the monthly testing protocol.



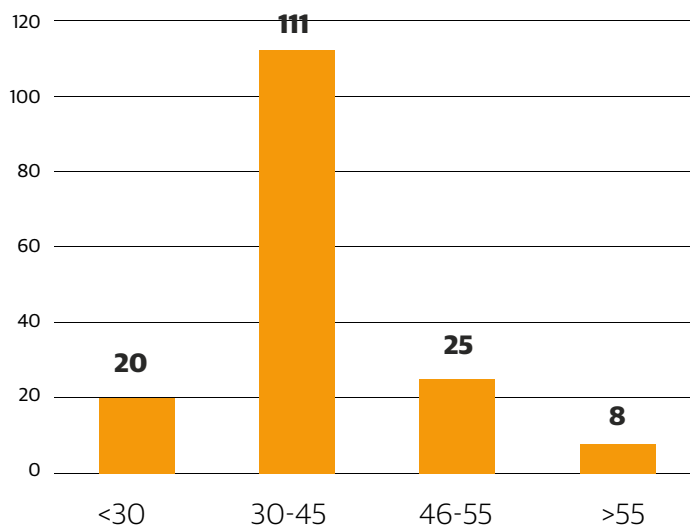
Talent Management

GRI: 102-8; Spanish Law (11/2018): 16, 17, 18

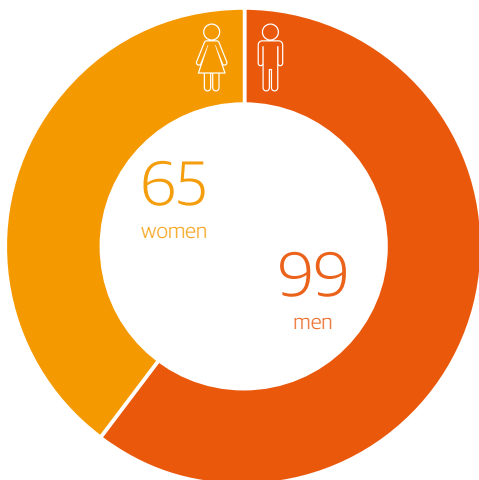
The company's goal is to create a great place to work. Thus, it undertakes actions such as constantly improving its processes for talent attraction and retention, labor development, climate management and work culture, among others. By providing good working conditions for the team, the company ensures that it attracts the best talent in terms of competencies, values and attitudes that are aligned with its purpose and culture. This enables the company to meet tomorrow's challenges and satisfy customer needs.

All the people working with the company contribute important elements to it, with leadership, appropriate management, innovation, and solutions, which today allow it to achieve the expected results. At the end of 2021, there were 164 employees in ARM's team.

The majority of employees are between 30 and 45 years of age.



Distribution by gender

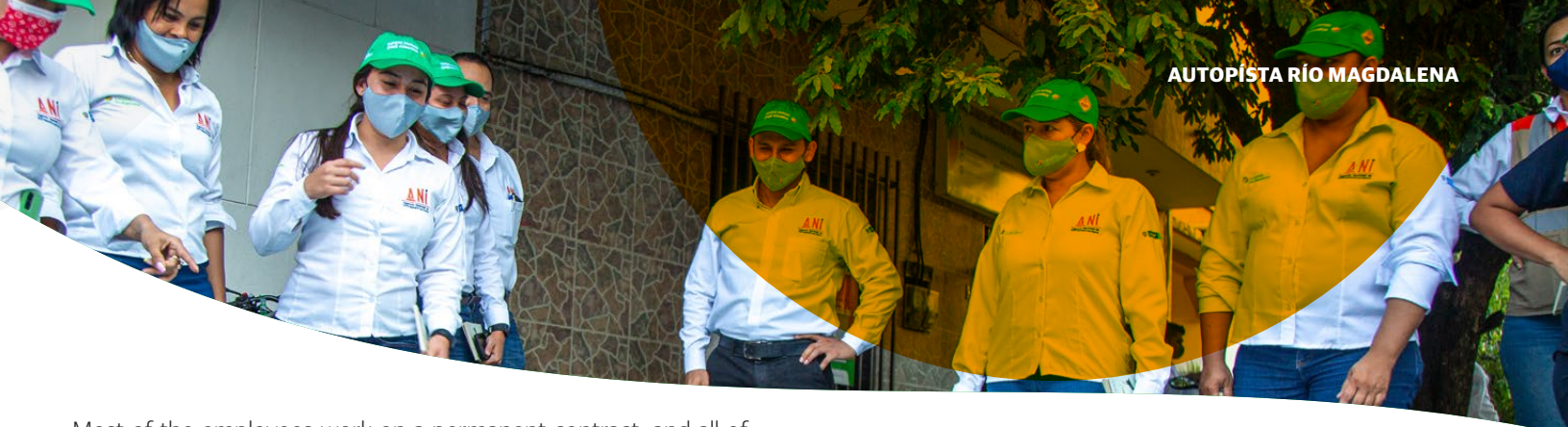


The company is determined to attract the best talent, under equal opportunity conditions and with no discrimination based on gender, race, sexual orientation, religious beliefs, political opinion, nationality, social origin, functional diversity, or any other circumstance.

The roles within the company allow for an adequate management system, as well as clear duties and responsibilities for each of the employees. These are distributed in three job categories: Executives, Middle Management and Administrative/Operations. The distribution by gender and labor category is shown below.

CATEGORY	MALE	FEMALE
Executives	7	1
Middle Management	15	13
Administrative/ Operations	77	51

100% of employees work full time.



Most of the employees work on a permanent contract, and all of them on a full-time basis.

TYPE OF CONTRACT

CATEGORY	TOTAL	PERMANENT	TEMPORARY	% PERMANENT
Executives	8	8	-	100%
Middle Management	28	28	-	100%
Administrative/Operations	128	125	3	98%

There are 164 employees, 98% of whom work under a permanent employment contract, while 2% have a temporary contract, mainly for two reasons: the nature of the service required or because they

are undergoing on-the-job training.

The distribution by age range is as follows:

TYPE OF CONTRACT

AGE RANGE	TOTAL	PERMANENT	TEMPORARY	% PERMANENT
<30	20	20	-	100%
30-45	111	109	2	98%
46-55	25	24	1	96%
>55	8	8	-	100%

The distribution by gender is shown below

TYPE OF CONTRACT

GENDER	TOTAL	PERMANENT	TEMPORARY	% PERMANENT
Male	99	99	-	100%
Female	65	62	3	95%

Collective Bargaining Agreements

GRI: 102-41; Spanish law (11/2018): 33, 34

ARM respects the human and labor rights of its employees. Child labor is prohibited, and when hiring new employees, the company makes sure that they can prove their legal age through a birth certificate.

Likewise, the company rejects any kind of forced labor practice and respects the maximum working day established by law. Whenever

employees work overtime, they are paid in accordance with the law. All employees are enrolled in the Social Security system.

Furthermore, in Colombia there are labor agreements between employees and employers that protect labor rights and make it possible to establish agreements between both. For this reason, there are no labor union agreements in Colombia.

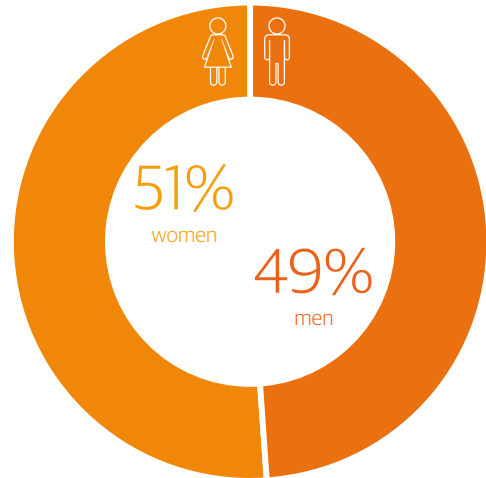
Hiring Employees

GRI: 401-1

Recognizing the importance of supporting diversity in the workforce to contribute to a more inclusive society, as well as to improve business performance, the company promotes egalitarian talent integration and development processes.

Throughout 2021, 45 new hires were made, of which 23 were women and 22 were men. This is equivalent to 51% and 49% respectively. This is evidence of the effectiveness of the company's hiring policies and processes based on equal treatment and free of gender discrimination.

New hires by gender



Absenteeism and sick leave

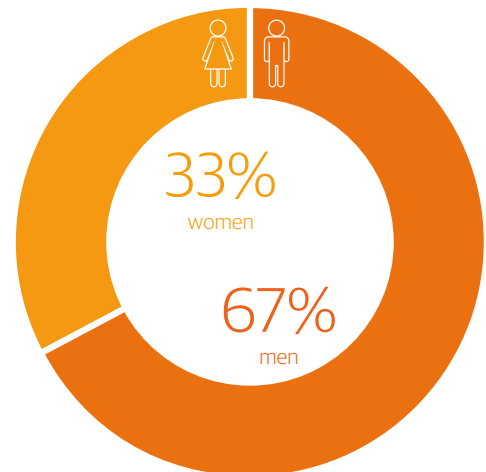
GRI: 401-1; Spanish law (11/2018): 19, 27

In 2021, the absenteeism rate was 1%, corresponding to **4.904 hours.**

HOURS WORKED PER YEAR*	ABSENCE HOURS	% ABSENTISM
434.911	4.904	1%

The distribution of absenteeism by gender was as follows:

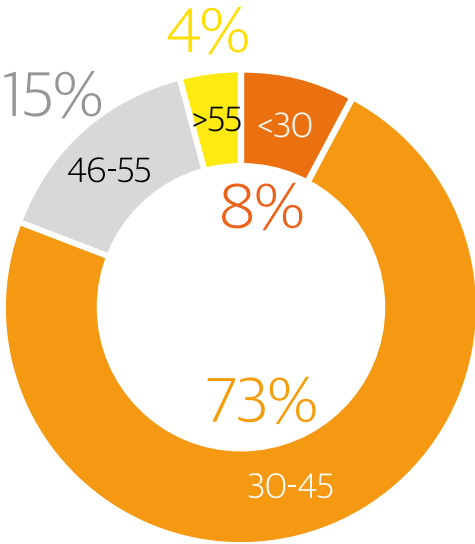
Absenteeism by gender



On the other hand, this year there were 26 employee departures, which represents a turnover rate of 16%. Of the 26 departures, 54% were men and 46% women.

TYPE OF DEPARTURE	MEN	WOMEN	TOTAL
Voluntary	6	9	15
Involuntary	8	3	11
Total	14	12	26

Currently, the smallest part of the workforce is made up of people 55 years of age or older, which is consistent with the fact that fewer people left the labor force in this group than in any other age group.



Most of the departures during 2021 belong to the group of people between 30 and 45 years of age, with 73%. This result is consistent given that this is also the age group that represents the majority of employees.

AGE GROUPS	VOLUNTARY DEPARTURES	INVOLUNTARY DEPARTURES	TOTAL
<30	2	-	2
30 - 45	13	6	19
46 - 55	-	4	4
>55	-	1	1
Total	15	11	26

Significantly, no executive positions were terminated during 2021. Operational and administrative positions had a higher turnover.

JOB CATEGORY	VOLUNTARY DEPARTURES	INVOLUNTARY DEPARTURES	TOTAL
Executives	-	-	-
Middle Management	3	5	8
Administrative/ Operations	8	10	18
Total	11	15	26



Platform for Talent Management

Spanish Law (11/2018): 35

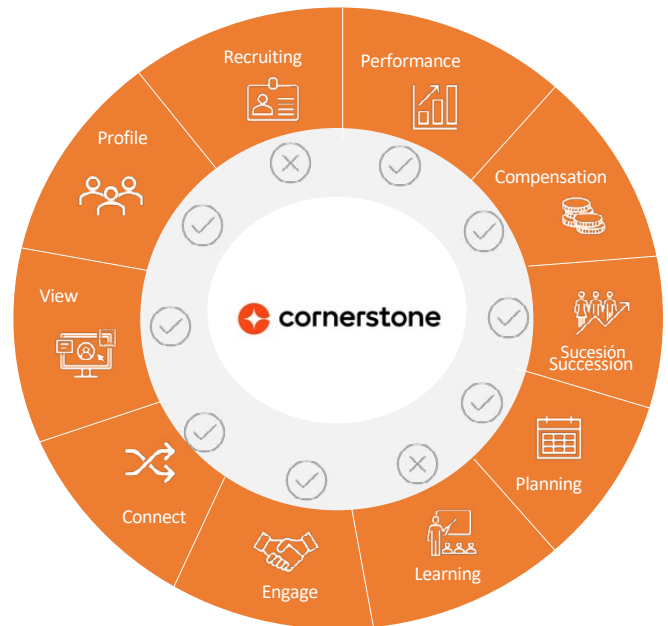
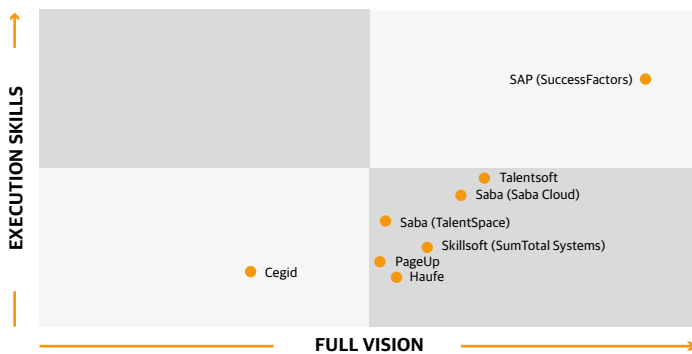
In order to ensure that the best talent is filling the right job positions, it is important to have comprehensive and innovative tools that allow the company to measure and promote productivity. To achieve the above, ARM implemented the Cornerstone system (also known internally as "ALEATICA Go!") which has gained recognition as one of the best systems of this kind, worldwide.

The system will link all Human Resources processes globally and will allow people to directly manage their requirements. By 2022, the integration of systems such as ADP (compensation) to the Cornerstone System is planned.



Leader in Talent Management

- Innovative software in the cloud since 1999
- One single database
- One single software: talent management, recruiting, training
- Talent development and retention
- Recognized in the top 100 software companies in 2020



The use of Cornerstone offers benefits such as:

Digitalization and standardization of employee information.

Visualization of organizational charts.

Administration of the performance management process.



Performance Evaluation

GRI: 404-3

Performance evaluations are important to monitor the fulfillment of objectives, to know and measure the performance of employees, as well as to detect growth areas and needs. This allows for the design and implementation of strategies that encourage staff commitment, continuous improvement, and the development of employee capabilities.

ARM's performance management process for executive positions has annual cycles organized in three phases:

- Objective setting
- Mid-year review
- Cycle-end review

Performance objectives are structured by shared business and individual goals and competencies that allow for a comprehensive employee performance evaluation. In this way, employee objectives are aligned with those of the company and aimed at generating shareholder value.

The performance management process follows the guidelines set by Corporate. Accordingly, this process was carried out in different stages. The first stage was aimed at executives and the second stage will be carried out during 2022 and will be aimed at middle management and professionals. The performance management process is developed through the Cornerstone platform.

The implementation of periodic performance evaluations provides great benefits for the company, among which are the following:

- Focus on productivity, derived from the strengthening of the performance management culture.
- Encourage employee commitment and alignment with the company's objectives.
- Develop and understand individual purpose and contribution.
- Facilitate salary reviews and talent development processes.
- Promote autonomy, empowerment, and a culture of self-management.
- Distinguish core tasks from value contributions.

In 2021, all executive positions underwent performance and professional development evaluation.

Training and Development

GRI: 404-1, 404-2

Employees and their integral development are extremely important to the company. Therefore, it offers the pertinent tools to enrich each employee's skills, which in turn increases the team's well-being and safety. In this way, the company encourages compliance with its guiding principles and values.

*In 2021, ARM invested **\$8.172.175** Colombian pesos in training and development programs.*

***100% of employees** underwent a training and development process.*

Throughout 2021, the company provided training on various topics of great impact for its organizational culture, fostering quality, productivity, and relevant competencies for the development of the business. Employees were also trained on health, safety, and well-being matters, in response to the challenge posed by the COVID-19 pandemic and the adoption of home-based work.

During 2021, a total of **4.251 hours** were allocated to training, with the following distribution by labor category:

JOB CATEGORY	HOURS
Executives	14
Middle Management	367
Administrative/Operations	3.870

The average number of hours allocated to training employees, by gender, was as follows:

GENDER	HOURS
Male	3.020
Female	1.231

In order to have the best training process, plans are underway to implement the Training Needs Detection (DNC) tool by 2022, to efficiently identify the development and training needs of the different areas and job positions. During 2021, the training topics developed were:

- Job technical skills.
- Equity, ethics, and values: code of ethics, conflict of interest, anti-corruption, and human rights.
- Occupational health and safety: safety, promotion, and prevention.
- Technical and specialized positions: Work at heights.
- Technology and cybercrime.

...the importance of carrying out performance evaluations periodically, to monitor objective compliance, to know and measure employee's performance...



Compensation

GRI: 102-35, 102-36, 202-1, 405-1, 405-2

ARM complies with legislation regarding salaries, working hours, working days and social benefits. It also strives to offer competitive compensation and benefits, which are in line with the local market average.

In terms of compensation, the company adheres to the Compensation Policy approved by the Board of Directors of ALEATICA, S.A.U. in December 2019 and by that of ALEATICAS.A.B. in February 2020, so as to ensure competitiveness, fairness and determination based on position and contribution to the business objectives. All employees have access to this policy through the Intranet.

On an annual basis, the company conducts an employee compensation review process that allows identifying gaps, thereby making it possible to implement improvements on an annual basis, seeking to achieve a compensation level of at least 80% of the market average.

It is worth noting that, in order to determine compensation, the company relies on specialized and independent consultants who guarantee and supervise the correct compliance of the compensation processes. Salaries are determined by the job responsibility level and no gender-based distinctions are made. Below are the average annual salaries earned by gender throughout 2021:



On the other hand, the wage ratio is defined as the average base salary of women in relation to the average base salary of men. To calculate this, the formula used is: (men's salary divided by women's salary)-1. When a high percentage is obtained as a result, a larger wage gap that benefits men is displayed. On the contrary, when the percentage is expressed in negative figures, it represents a higher income for women. Finally, when the percentage is close to zero, it indicates wage equality. Within this framework, the wage ratio (men - women) by labor category is presented below:



In addition, compensation reviews for executives who are members of the Business Unit Management Committees must be approved by the Chief Executive Officer.

For ARM it is of utmost importance to offer fair and competitive salaries in all labor categories, as this is a determining factor in attracting and retaining talent. Below are the average annual salaries by labor category:

JOB CATEGORY	AVERAGE SALARY 2021
Executives	27.925.000
Middle Management	6.132.687
Administrative/Operations	2.336.874

Upon joining the company, the minimum monthly remuneration is at least the minimum wage in operational positions (monthly minimum wage equivalent to €213.5), for both men and women, and no discrimination is made on the basis of gender, race, age, or any other characteristic, complying with the law.

Benefits and Working Conditions

GRI: 103-2, 401-2, 402-1

The company's objective is to provide appropriate working conditions for each of its team members to balance their personal and family life in a way that promotes physical and emotional wellbeing.

That is why it offers employee benefits and initiatives that guarantee their well-being. These include:

- Life insurance
- Funeral insurance
- Disability or medical leave insurance
- Statutory parental leave
- Paid days to address personal matters

ARM respects universal human rights, and therefore child labor is prohibited.

In order to ensure this, when hiring new employees, the company requests that they present their identity document to validate their legal age.

Likewise, any kind of forced labor is rejected. Employees may resign from the company whenever they decide to do so, and any irregular situation in this regard may be reported to Human Resources.

In compliance with Colombian regulations, all employees are affiliated to Social Security and parafiscal contributions. Furthermore, compensation funds have an unemployment subsidy that is managed by the former employee in case of retirement or unemployment.



Reimagine ALEATICA

The COVID-19 pandemic was a global challenge. ARM is convinced of the importance of protecting employees and ensuring customer well-being, while keeping in mind the safety of the communities it serves.

Therefore, the implementation of the **Reimagine** program continues, allowing for an appropriate work model for administrative employees to have the possibility to work:

- Two days a week from home.
- Two days a week at the office.

ARM provides its employees with an optimal place to carry out their activities on the days they work from the office. In order to improve their quality of life, as well as to coordinate the work teams, ARM seeks to:

- Establish work schedules that maximize the interaction window between countries.
- Define collaborative schedules and rules for scheduling meetings, calls, and e-mails.
- Set break and disconnection times to promote greater productivity and improve employee quality of life.

Employee Well-being

GRI: 403-1, 403-2, 403-3, 403-6, 403-7

ARM is committed to protecting its employees while simultaneously ensuring the safety of its stakeholders and the well-being of the communities it serves.

In 2021, protection against the COVID-19 pandemic continued to be a priority; as part of the strategy implemented to deal with it, the Health Alert Committee is responsible for disseminating relevant information on the subject, as well as implementing relevant training on contagion, prevention measures, discoveries, among others.

Global health recommendations to avoid contagion are being followed, such as promoting vaccination, avoiding physical contact, using antibacterial gel, and ensuring hand hygiene, avoiding attending the workplace whenever there are any symptoms related to the SARS-CoV-2 virus or if employees have had contact with a person with the virus in the last 10 days.

Today, the company is adapting to a new reality, in which protecting employee wellbeing and health continues to be a major concern, which is why ARM is implementing the following actions:

- Home and staggered work for administrative employees.
- Identification of vulnerable operational employees and positive cases so that they can be fully homebound with 100% pay.
- Use of the COVID-19 Tracker tool to identify possible cases of contagion, positive cases, immunized, hospitalized and deaths.
- Conduct communication and training campaigns to prevent stigmatization of staff recovered from COVID-19.
- Provide medical follow-up, through the Medical Team and the Human Resources department, to vulnerable personnel, suspected cases, and positive cases.
- Provide education and training to prevent and mitigate the risk of contagion.

The company intends to continue working along these lines and to implement prevention and control protocols, as well as protective measures that contribute to the physical, mental, and emotional wellbeing of each employee.

Engaged Performance

ARM knows that what cannot be measured, cannot be improved, so in 2021 the company implemented for the first time the **Engaged Performance** organizational culture and climate diagnostic.

The results of this survey have allowed the company to evaluate the team' commitment and satisfaction, identify strengths to continue promoting and determine the potential growth areas in which the team should work. Plans are in place for 2022 to work on an appropriate action plan to improve in all areas of the organization.



Reconciliation of work and family life

GRI: 401-3; Spanish law (11/2018): 24, 28

Maternity or paternity leaves are breaks established by law and compensated by the Health Promoting Entity, for all those workers who welcome a new member to their family. ARM guarantees that every employee entitled to parental leave. In 2021, one employees exercised this right, equivalent to 2% of our workforce.



Cabe destacar que la persona que ejercio el permiso de maternidad continúa laborando en nuestra empresa.

Equality, Diversity, and Inclusion

GRI: 405-1,202-2; Spanish law (11/2018): 38, 39, 40, 41

Being a company committed to sustainable development means taking actions that improve the world in all areas. This includes being consistent with the provisions of Human Rights and implementing practices that ensure diversity and inclusion of all individuals.

This is why the company implements initiatives to promote the presence of women in all job categories, improve the working conditions of all company employees, and support the rights of each and every individual.

ARM guarantees equal opportunities and is committed to providing the means to assist all employees in their professional and personal development.

Likewise, no discrimination is permitted on the grounds of gender, race, sexual orientation, religious beliefs, political opinions, nationality, social origin, disability, or any other circumstance potentially susceptible to be a source of discrimination. Every employee will promote the principles of equal opportunity and non-discrimination and will contribute to create a diverse and inclusive work environment.

As part of the measures taken to guarantee the above, there is a **Human Rights Policy**, which addresses the implementation of actions focused on gender parity in hiring processes, internal promotion, training, work and family life health and improvements in working conditions, accessibility, and internal communication channels, all of which guarantee the right of employees to be informed and to submit queries, criticisms, complaints, and denunciations.

Likewise, the **Gender Equality Policy** is based on the following guiding principles and guidelines:

- Equal treatment for men and women.
- Ensuring that there is no direct or indirect gender-based discrimination of any kind.
- Banning of moral harassment.
- Zero tolerance for sexual harassment.
- Principle of indemnity against retaliation.

6 of the management positions are filled by local employees.

By the end of 2021, 40% of the workforce was made up of women.



Currently, **1 woman** holds a managerial position.

In addition, through the **Code of Ethics**, any type of discrimination and any type of harassment, abuse of authority, threats, pressure, moral harassment, offense or any other form of aggressiveness and hostility that creates a climate of intimidation is rejected. Should any circumstance arise that goes against the company's values, regulations and principles, employees are provided with channels and mechanisms through which they can make any complaints they deem necessary.

No discrimination complaints were filed.

Online conferences (webinars) have been developed and delivered on the following topics:

Accessibility

Spanish Law (11/2018): 25, 37, 42, 43

The company seeks to provide an inclusive space and have a positive impact through a commitment to functional diversity, in addition to reinforcing the responsibility to provide accessibility conditions for employees as well as for customers and the general public.

1. Equality begins with us
2. Care is a team effort
3. Inclusion in times of crisis
4. Diversity and Inclusion are not the same thing

It is worth noting that during 2021, a total of 28 hours were dedicated to training in policies or procedures related to Human Rights, which means that 34% of all employees underwent a training process on the subject.

The company will continue to work to strengthen a respectful work environment, where all employees feel comfortable, safe, and healthy.

Currently, no disabled personnel are working in the company; however, the new CCO facilities in Puerto Berrío, offer universal access, ramps, and an elevator.

Commitments and Goals for the Future

For 2022, the company has set great challenges to improve employees' quality of life; one of them is to implement teleworking, in order to be able to offer new work modalities.

An Organizational Climate Plan will be implemented and an Incentive Plan will be generated to promote company's pillars.

In addition, a human rights impact assessment will be conducted as part of the organizational diagnosis and in order to determine a roadmap that will allow the company to permanently reinforce risk prevention and mitigation measures regarding human rights.



...The company guarantees equal opportunities and is committed to providing the means to help all employees in their professional and personal development...



Service Excellence



Data¹⁸

Average rating of satisfaction surveys on response to complaints and attention provided

7,8/10¹⁹

Average rating of roadside customer satisfaction surveys

9,5/10

Introduction

Customers are the main focus of ARM's operations and services. For this reason, it strives to meet their requirements and fulfill their expectations when using the roadways, ensuring that they have a first-class experience. Customers are the main focus of ARM's operations and services. For this reason, it strives to meet their requirements and fulfill their expectations when using the roadways, ensuring that they have a first-class experience.

The company seeks to evolve towards a **Customer Experience (CX)**, which will redefine ARM's culture, integrated in all areas of the company, and the perception of its customers, understanding and meeting their needs both internally and externally.

Continuous training and improvement of the service provided are fundamental to the pillar, as well as following best practices and international standards on service and customer satisfaction.

The company has a fresh perspective focused on providing customers with safe, comfortable, and agile journeys. Teams will learn new skills and insights to become Customer Experience (CX) experts.

Autopista Río Magdalena (ARM) intersects the municipalities of Remedios, Vegachí, Yalí, Yolombó, Maceo and Puerto Berrío in the Department of Antioquia and the municipality of Cimitarra in the Department of Santander. Sectors served are **customers of the road and neighboring communities**.

One of ARM's main objectives is to strengthen relationships of credibility and trust with the communities surrounding the project's area of influence and with the customers using the road. In order to achieve this, intervention processes play a fundamental role, addressing the issues that may arise when dealing with the different social actors and stakeholders in the area. ARM implements actions aimed at preventing, mitigating, and compensating for the impacts generated on the socioeconomic context during the execution of the project. With the above, the company seeks to contribute to the strengthening of trust, the recognition of opportunities, and social and economic development, which must be translated into sustainable development for the region the company serves.

¹⁸ All figures are as of the end of 2021.

Key Achievements

From the Customer Service program, community outreach strategies were implemented to promote spaces for interaction, recreation, and training with the communities. Through the implementation of the outreach strategy composed of Challenge: A Vegetable Garden at Home (*Reto: Una Huerta en Casa*), Soccer for Training (*Fútbol Para Formar*) and Christmas Outreach (*Relacionamiento Navideño*), 422 activities were carried out and 1.767 people participated.

Massive community and social communication strategies were designed and implemented, aimed at positioning the project and creating a favorable information and acceptance environment in the community that contributes to the lowest possible social impact and the normal development of the project.

Intelligent Transportation Systems

During 2021, ITS intelligent transportation systems were installed and began operating for the FU4 road corridor, including communication systems for customers consisting of SOS phones

and variable messaging panels, CCTV traffic monitoring, speed and road occupancy sensors, and monitoring of atmospheric conditions that impact road safety in the road corridor.





Customer Service Indicators

ARM has six indicators to measure event response capacity, comfort, and customer perception of road safety.

During 2021, 100% of the service levels (condition and operation indicators according to Appendix 2 of the concession contract) were met.

Operation indicators:

- Attention time for incidents such as stranded vehicles, fallen trees and landslides (signaling - 1 hour, event clearance - 4 hours on roadway and 24 hours on berm).
- Accident and emergency response time (signaling, ambulance arrival - 30 minutes, cranes, and other necessary equipment - 1 hour).

Condition indicators:

- Margin condition (vegetation height <40 cm)
- Potholes (affected area <= 4% of the roadway)
- Surface, longitudinal, and transversal drainage (clogging <=25% of the hydraulic section)
- Vertical signaling (reflectivity >80%)

There are four additional indicators to measure the attention and service provided to customers, through which action plans are developed to follow up on results, address relevant situations and intelligently analyze information.

Complaints and Contacts

INDICATOR	DESCRIPTION
Ratio of complaints to contacts	Percentage of complaints received, given the total number of contacts
Ratio complaints - capacity	Complaints received per million vehicles/users

Customer Surveys

INDICATOR	DESCRIPTION
Customer Satisfaction Survey	Percentage of satisfied customers who consider that they have had a very good service
Net Promoter Score	Measures a customer's loyalty and how likely they are to recommend the company after receiving a service



Means of Contact

Focused on providing an excellent service experience, **the company provides different means of contact with customers**, which facilitate communication and help understand their needs and expectations.

The means of contact used by ARM are:

- Website
- Email
- Document submission channels
- Call Center
- Control Center / Emergency Response Center - CAE
- Contact Center
- Twitter
- Facebook
- YouTube
- WhatsApp

Satisfaction Surveys

Road Customers

Listening to and recognizing the opinion of the customers about the service provided through satisfaction surveys is a fundamental part of the Service Excellence pillar.

Customer satisfaction surveys provide information on the customer's opinion of ARM's service and road conditions.

In August 2021 and February 2022, customer satisfaction surveys were conducted for the first and second half of 2022, respectively.

The purpose was to determine the degree of satisfaction of the customers traveling along the road corridor, regarding different aspects such as the service provided by the Operations Control Center (Centro de Control de Operaciones, CCO), travel times, service and attention provided by road assistance personnel, service and waiting time at the toll booth, signaling, road cleanliness, and safety, among others.

The highest ratings were given mainly to the service provided by the personnel working on the road (repair car, tow trucks and ambulance). Likewise, the attention provided by the CCO and the toll booths, as well as the perception of safety when traveling along the road corridor under concession, also stood out.

Satisfaction survey ratings were 93% and 96% for the first and second half of 2021, respectively.

Furthermore, on a monthly basis, ARM, through the CAE and after the provision of the services, conducts a quick survey to the

customers, which measures their satisfaction with the service provided (NPS).

Net Promoter Score (NPS) is an indicator that measures the customer's satisfaction with the services provided.

On a scale of 1 to 10, would you recommend this service?

0-6 Detractors

7-8 Neutral

9-10 Supporters or promoters

$NPS = (\% \text{ Promoters}) - (\% \text{ Detractors})$

SERVICE	2021 NPS
Repair car	99%
Inspection	98%
Light crane	99%
Heavy crane	100%
Ambulance	100%
CAE	99%



Satisfaction with response and attention to requests from communities and customers

ARM measures customer satisfaction through biannual surveys that help measure the level of satisfaction of customers and communities regarding the service received from the customer service offices.

Satisfaction surveys allow to obtain information on customer satisfaction in terms of response times, the quality of the answers and the attention provided during the process.

The average satisfaction survey rating in the first semester of 2021 (February to July) was **76%**. However, in the last quarter of the year (August 2021 to January 2022) it rose to an average **80%** satisfaction rating, resulting in a score of 78/100.

It is important to mention that the Customer Service program implemented community outreach strategies, which allowed to promote spaces for interaction, recreation, and training with the communities, **where 422 activities were carried out, engaging 1,767 people.** It included the implementation of the outreach strategy composed of Challenge: A Vegetable Garden at Home (Reto: Una Huerta en Casa), Soccer for Training (Fútbol Para Formar) and Christmas Outreach (Relacionamiento Navideño).

Massive community and social communication strategies were designed and implemented, aimed at positioning the project and creating a favorable information and acceptance environment in the community that contributes to the lowest possible social impact and the normal development of the project.





Complaint System

ARM provides customers with different communication channels to listen and attend to their requirements and requests, as well as to ensure the correct reception of complaints.

Complaints are handled by the **Customer Service area**, where **they are attended to, registered, and classified according to the reason behind the request in order to provide a correct follow-up**. In the event that the complaint is not resolved at the first contact, the executives communicate via telephone or e-mail with the customer reporting the incident.

Complaints are forwarded to the areas involved and **analyzed according to the situation reported**, where those responsible

review and resolve the complaint, establishing corrective and follow-up actions, providing the area involved with the corresponding feedback. There is **continuous coordination between operation and maintenance areas**, as well as with contracted suppliers who, due to their nature, have direct contact with customers.

The customer is notified in writing via e-mail of the decision on complaints that have been accepted or rejected in order to meet compliance deadlines.

Complaints

During 2021, there were 235 PQRS (Petitionen, Quejas, Reclamos y Sugerencias - Requests, Complaints, Claims and Suggestions) received, addressed, and closed. Such complaints were received through the different customer service means or channels established by ARM.



Main Reasons for Complaint

During 2021, dissatisfaction and discomfort of customers was identified in travel times along the road corridor, which was reasonable due to the multiple traffic controls due to the progress of work on FU3 and FU4.

From the business unit, in the reported period, the recurring issues are the processes of land acquisition and affectations associated with the construction of the project. The different socializations have been carried out with the owners of land for acquisition, who have expressed concerns in this regard. Meetings have also been held with municipal authorities and control entities such as municipal councils, in order to disclose information about the

process, the laws that support it and how the land acquisition process is carried out.

Regarding impacts resulting from construction processes, the communities' concerns are addressed and the work contractors are informed in order to address and resolve any disagreement in the shortest possible time.

ARM has excelled in customer service provided by the personnel who render road assistance services. Thanks to the customer service training that ARM employees receive periodically, there have been no complaints on this matter.

Personal Data Privacy

GRI: 418-1

ARM is subject to the **DAJ-NORM-04. ALEATICA's Personal Data Protection Standard**, establishing how and who is responsible for carrying out these actions. Likewise, there is a **a Supplier Privacy Notice** (click here to see the Supplier Privacy Notice model: <https://www.aleatica.com/avisos-de-privacidad-global/>).

When data is transmitted to suppliers so that they can process it on behalf of the corporate companies, Processing Contracts

are signed. ARM has a Data Protection Officer appointed by the Company's Board of Directors, who is currently Catalina Rojas.

In addition, the company has a Global Data Protection Delegate established in Spain, with more than 10 years of experience in Privacy and Data Protection, to whom the Heads of the Data Protection Activity of all the Group's companies report and who supports them, whose roles and responsibilities are also defined in the **DAJ-NORM-04 Personal Data Protection Standard**.

ALEATICA's Global Data Protection Officer:

- Defines annual action plans that in terms of Privacy and Data protection must be executed, and follows them up through one-to-one meetings and, also within the Global Data Protection Committee.
- Reports quarterly to the Audit Committee, the status of the annual action plan.
- Reports biannually to the Board of Directors on the status of the implementation of the action plan.
- Performs an annual assessment of Privacy & Data Protection Risks within the framework of ERM (Enterprise Risk Management), defines mitigation plans, follows up on them and reports its status on a quarterly basis.

A **Zero Tolerance Policy for Negligent or Deliberate Non-Compliance** cwith Corporate Rules, including Privacy and Data Protection. Disciplinary sanctions in these cases follow the established labor procedures, guaranteeing full protection of workers' rights.

The **DAJ-NORM-04 Personal Data Protection Standard** establishes that ALEATICA's Management Committee must annually approve an audit plan for the following year, identifying companies, areas, data processing, contracts, security, in order to cover these audits.

In 2021, there were no complaints regarding breaches of customer privacy, theft, or loss of customer data.

Commitments and Goals for the Future

Customer service is a priority for the company, which strives for excellence in service, so the Customer Service program is designed to:

- Provide communities and customers with constant attention, answering questions and concerns, and supporting them in order to guarantee and maintain relationships of trust, as well as developing strategies that allow for project recognition, thus reducing tensions that arise during project execution.
- Keep a customer service system that allows timely and efficient reception, attention and processing of requests, complaints, requests, and suggestions submitted in person, via website or telephone, in order to contribute to the satisfaction of the project's neighbors and customers.
- Promote a proactive coexistence between the project and the community, respect for citizens, timely attention to their concerns and accompaniment at all times throughout the project, while incorporating the Sustainable Development Goals 2030 Agenda in the implementation of relationship strategies.

The Customer Service program, seeking excellence in customer service, has the following objectives:

- To provide warm, respectful, and assertive attention to the customers and neighbors of the project, in order to build growing and lasting relationships between the communities and the project.
- Provide timely response to PQRS (Requests, Complaints, Claims and Suggestions) submitted by the customers and the community neighboring the project according to the provisions of the social management appendix.
- Develop strategies to strengthen trusting relationships and building closer ties between the project and the communities.
- Strive for the continuous improvement of the customer service system through ongoing evaluation and follow-up.
- Mitigate false expectations among the communities that may arise from the execution of the project.
- Keep up the excellence in the provision of road assistance services.

For 2022, ARM will seek to:

- Focus and structure a long-term planning for the maturity of the customer experience, improving customer satisfaction, loyalty and generating a positive impact on ARM's results.
- Create alignment across the organization and bring other teams together around a customer-centric vision, especially with the operational team, who are at the forefront of the service provided.
- Increase self-help channels, so that customers can resolve their needs almost instantaneously thanks to automation and technological tools to develop efficiency and provide an omnichannel experience.
- Conduct quarterly training for the operations team on customer service and customer care, in order to strengthen competencies for providing services rendered by the company.
- Keep up the excellent results in the NPS so that customers will recommend services to their peers.



Social and Environment Sustainability



GRI: 102-11, 102-13, 102-15, 102-16, 102-17, 102-29, 103-2, 103-3, 201-2, 203-1, 203-2, 301-1, 302-1, 303-2, 303-5,
304-2, 304-3, 305-1, 305-2, 305-3, 305-5, 306-2, 307-1, 308-1, 408-1, 409-1, 413-1, 414-1

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Data

Social investment

\$920.270.292 CP

of investment for social management and the Environmental and Social Responsibility plan

Operating energy consumption

126 KW/h

average monthly per capita consumption in operational offices

347 KW/h

average monthly per capita consumption in tolls

Partnership to support conservation programs in the ecosystems surrounding the project

7.100

individuals planted

Operating water consumption

2,2m³

of average monthly per capita consumption

Environmental training

270

employees received environmental training

527,5

hours of environmental training

Introduction

ARM's priority is to be aligned with ALEATICA's global social and environmental sustainability pillar, so its goals and objectives are aligned with the activities set out in the Contractual Social Management Plan, where improvements in the integration of the project in the region with social actors, public and private institutions and trade associations are planned.

The company seeks to effectively manage the risks and impacts considered in the obligations established in the Social Technical Appendix 8, the Equator Principles guidelines, the International Finance Corporation's (IFC) Performance Standards on Environmental and Social Sustainability, and current social standards,

aiming to develop programs that guarantee permanent attention to the communities and the consolidation of sustainable scenarios.

Through the **Integrated Safety, Occupational Health, Environment and Quality Management Policy**, the company seeks to strengthen internal capabilities to ensure the efficient use of renewable and non-renewable resources, to mitigate and prevent socio-environmental impacts, to ensure compliance with applicable legal requirements and the satisfaction of stakeholders.

Therefore, contributing to the Sustainable Development of the regions where it operates is one of ARM's main priorities.



Main Environmental and Social Achievements

- **Social investment** in the Contractual Social Management Plan amounting to **\$915.535.850 CP** and in the Environmental and Social Responsibility Plan amounting to **\$4.734.442 CP**.
- A **Materiality Analysis and a Strategic Plan** were developed for execution in 2022, focused on the reinforcement of actions previously executed throughout the company's operations, considering their current maturity.
- **+ 5.000 people benefited** by the company's intervention and social development projects.
- **+ 680 activities, courses and training** focused on community development through training, education, and certification of competencies in the communities surrounding the project.
- **Contribute to the socioeconomic development of the region** and of the different social players, through the articulation of strategic alliances that promote the implementation of self-sustainable productive initiatives and/or projects.
- **Social innovation with community** relationship strategies such as the **Challenge: A Vegetable Garden at Home**, (*Reto: Una Huerta en Casa*), which has allowed to maintain social articulation with the communities, contributing to food sustainability, mitigating the impact of the pandemic on the family economy, improving nutritional diversity, and raising awareness of environmental protection.
- The **certification process** for measuring the company's carbon footprint began, with the aim of obtaining certification by 2022.
- The company developed its **Mitigation Strategy for the Reduction of GHG Emissions**, aligned with ALEATICA's Global Strategy, with a 2022-2030 action plan, based on the guidelines of the Greenhouse Gas Protocol, Carbon Disclosure Project, and the methodology of the Science Based Targets initiatives (SBTi).
- The company **developed the Adaptation and Resilience Strategy** with an action plan starting in 2022, in order to anticipate and reduce the risks associated with the effects of climate change.



ARM's Social Commitment

GRI: 102-13, 203-1,203, -2, 413-1

ARM develops social and environmental plans, programs and projects that respond to the needs identified in the communities near its operations in order to generate positive and measurable impacts that develop social well-being.

Under the slogan "If it's not sustainable, it's not real development", the company aims to establish a comprehensive social and environmental sustainability agenda to ensure the momentum of measurable contributions to the 2030 Sustainable Development Goals, interrelated to global challenges such as poverty, inequality, climate, environmental degradation, prosperity, peace, and justice.

ARM's Social Work

ARM executes two plans: the Contractual Social Management Plan and the Environmental and Social Responsibility Plan, from which social management programs are derived based on needs identified in the field with the communities, from the context of the territory and social dynamics.

The programs that are part of the Contractual Social Management Plan are framed in actions based on social and environmental responsibility, as well as the care of the communities impacted by the project::

1. Customer Service Program
2. Education and training program for personnel involved in the project
3. Manpower recruitment program
4. Community information and participation program

5. Institutional management capacity support program
6. Training, education and awareness-raising program for the community surrounding the project.
7. Preventive archeology program
8. Road culture program
9. Social and property management support program

The Environmental and Social Responsibility Plan is divided into two lines of work and is executed with the purpose of improving the environmental and social environment, developing strategies in the communities that are part of the area of influence:

1. Environmental sustainability line
2. Sustainable productive projects line

Contractual Social Management Plan

The Social Management Plan provides geographic coverage to the municipalities of Remedios, Vegachí, Yalí, Yolombó, Maceo, and Puerto Berrío in the Department of Antioquia and Cimitarra in the

Department of Santander. These actions allowed for strengthening the relationship with the communities, social actors, public and private institutions, and trade unions.

Customer Service Program

Community outreach strategies were implemented to promote spaces for interaction, recreation, and training with the communities. Through the implementation of the outreach strategy composed of Challenge: A Vegetable Garden at Home (*Reto: Una Huerta en Casa*), Soccer for Training (*Fútbol Para Formar*) and Christmas Outreach (*Relacionamiento Navideño*), 422 activities were carried out and 1.767 people participated.

Empréndelo Strategy Project

ARM continues to promote business growth, and for the fourth consecutive year has led the *Merca-Emprende* strategy with local institutions, creating spaces for local entrepreneurs to market their products, as well as developing a communication and dissemination strategy to achieve greater impact.

In June 2021, the Northeast Regional *Merca-Emprende* version No. 4 was held in the main park next to the Mayor's Office and the Maruja Martínez Educational Park, gathering 46 entrepreneurs, divided into four pavilions, offering gastronomic, agricultural and livestock products and handicrafts, as well as services from different institutions and entrepreneurs.



¡Una vitrina para el Desarrollo!

Supplier Development Program

This program offers micro, small, and medium-sized enterprises (MSMEs) comprehensive support by strengthening and providing specialized support to improve their business competencies and the skills of their work teams. Thanks to the articulation of anchor companies in the territory, such as the Chamber of Commerce of Magdalena Medio and Northeast Antioquia (*Cámara de Comercio del Magdalena Medio y Nordeste Antioqueño*), the Government of Antioquia, Comfenalco, SENA, CEMEX, Gramalote and the Business Units Vías del Nus and Autopista Río Magdalena, 43 companies were registered at the end of 2021, of which the business models of 16 companies, all local, were diagnosed.

Institutional management capacity support program

The graduation ceremony for the diploma course in “Public Management - Digital Innovation and Social Competitiveness” was held for 58 public officials, 30 of whom belong to the project’s area of influence. The partner institutions that made this diploma course possible were CEMEX, Gramalote, Chamber of Commerce of Magdalena Medio and Northeastern Antioquia (*Cámara de Comercio del Magdalena Medio y Nordeste Antioqueño*), Government of Antioquia, Innovation Network from Higher Education (Red de Innovación desde La Educación Superior, RISES) and the University of Medellín.

Manpower recruitment program

Local employment generation through the hiring of labor by complying with the Labor Recruitment Protocol, guaranteeing the prioritization in hiring people from the Area of Direct Influence²⁰. This was achieved in coordination with the Public Employment Agency (*Agencia Pública de Empleo, APE-SENA*), responsible for the labor intermediation processes.

During 2021, 190 corporate induction activities have been carried out for 4.771 employees who have joined the project, 150 trainings for 2.304 employees and 17 awareness activities in the different work fronts of the project, reaching more than 535 employees, disseminating general information, aspects of social management, and labor recruitment protocol, among others.



²⁰ Area of Direct Influence refers to the seven municipalities that the project traverses: Cimitarra in the Department of Santander and Puerto Berrío, Maceo, Yalí, Yolombo, Vegachí and Remedios in the Department of Antioquia.

Integral Community Training Plan (*Plan Integral de Capacitación a Comunidades, PIICC*)

45 training activities were carried out with 1,149 participants, thus continuing to provide training to communities, generating social, economic, and environmental development processes that strengthen the social fabric.

As part of the development of the PIICC's Participatory Environmental Management line, the execution of the "Challenge: A Vegetable Garden at Home" (Reto: Una Huerta en Casa) strategy continues. This proposal emerged in 2020 as a response to the preventive social isolation resulting from the COVID-19 pandemic, seeking to maintain social ties with the communities, contribute to food sustainability, mitigate the impacts of the pandemic on the family economy, improve nutritional diversity, raise awareness of environmental protection, market surpluses in strategies supported by the company, such as Merca-Emprende, green markets, and in this way, build capacity in the communities surrounding the project's Area of Direct Influence (ADI).

ARM accompanied and followed-up the 227 participating families in 38 population centers in the four Functional Units comprising the project. Through 517 field visits and 2,312 telephone follow-ups, progress in the vegetable gardens was verified, concerns were resolved and experiences were shared, in addition to highlighting the benefits of having a vegetable garden at home.



... contribute to **food sustainability**,
mitigate the impacts of the pandemic on the
family economy, improve nutritional diversity,
**raise awareness of environmental
protection...**

Education, sensitization, and awareness program

Civic and environmental workshops on topics such as the Sustainable Development Goals (SDGs), solid waste management, recycling and cleanup and reforestation of water sources were carried out. To this end, coordination efforts were made with institutions, entities, companies, and organizations operating in the territories. During 2021, 65 activities with 937 participants were carried out, where 7.100 trees donated by *Empresas Públicas de Medellín* (EPM) to ARM were planted. These activities are called "SEMBRATÓN" and were developed with strategic allies in the territory and in compliance with the protocols and biosafety measures.



Consultancy for the ASOMUMIVE women's farm in the municipality of Vegachí

Strengthening of productive units identified in Functional Unit 2 continued. In the municipality of Vegachí, support was provided to the ASOMUMIVE women's farm on issues related to the adaptation of ponds, production projection, crop diversification and review of calls for proposals for funding sources.





Consultancy for *Mujeres que transforman el campo* in the municipality of Yalí

Continuing with the identification and follow-up of productive processes in the municipalities in the project's area of influence, in coordination with the Yalí Municipal Mayor's Office, support was provided to *Mujeres que transforman el campo de Yalí* (Women transforming the countryside of Yalí), located in the Santa Bárbara and Montañitas villages. This group of women has a vocation for the transformation of aromatic plants, crops, harvested fruit and fish farming and they are in the process of being formed and formalized.

Road Culture Program

The Road Culture program has two strategic lines, aimed at contributing to the development of a safe road culture in the communities of the ADI. The first is focused on the promotion of road culture, seeking that road actors adopt measures or habits that improve their behavior on the road. The second is to strengthen in a pedagogical way the appropriate and responsible habits that contribute to forge a safe road culture in the educational institutions in the ADI, contributing to the consolidation of a healthy culture in road mobility in the educational institutions of the road corridor.

The company took part in the execution of 155 activities aimed at road actors who travel along the road corridor, communities, employees, and educational institutions, with the objective of reducing accident rates, contributing to the reduction of human and material losses caused by traffic accidents, and strengthening the culture of citizenship in relation to the safe and comfortable use of road infrastructure.

REMEMBER:
**"WE ARE ALL
ROAD SAFETY"**

Have a **safe arrival** to destination. Remember that Sociedad Autopista Río Magdalena is **working to ensure the road safety** of each and every one of the road travelers.



ARM's Environmental Commitment

GRI: 102-11, 103-2, 307-1

Autopista Río Magdalena is committed to fully comply with the applicable environmental laws and regulations through the procedure of Identification of Legal Requirements and other requirements, where environmental legal requirements are periodically identified and evaluated, mitigating, and controlling any non-compliance that may result in fines or penalties resulting from any omission. Furthermore, the Environmental Management System based on ISO 14001:2015 was adopted and implemented in order to improve environmental control and apply best practices in all operations.

During 2021, **there were no cases of non-compliance** with environmental laws or regulations that resulted in any fines or penalties.

In addition, as part of the Environmental Management System, employees were trained to ensure compliance with laws and regulations, ensure proper risk management, and achieve environmental objectives. During 2021, 270 employees were trained, with a total of 527,5 hours of environmental training.



Climate Strategy

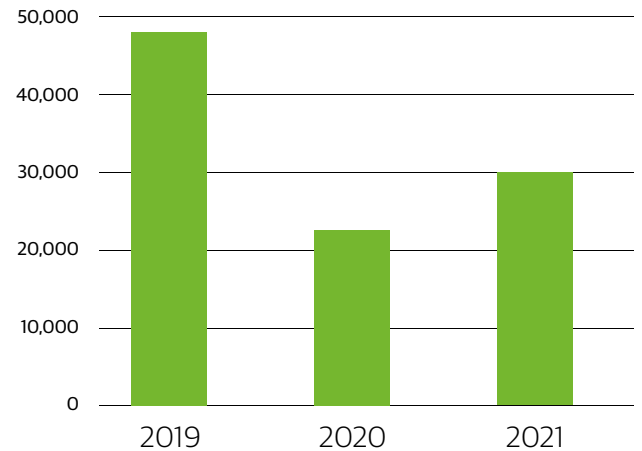
GRI: 103-2, 201-2, 305-1, 305-2, 305-3, 305-5; SASB: TR-RO-110a.1, TR-RO-110a.2

Greenhouse Gas (GHG) Emissions Measurement

During 2021, efforts were focused on the carbon footprint measurement process, in response to the priority issues of the UN 2030 Agenda, to meet the Sustainable Development Goals, accelerating solutions to the world's main challenges in terms of climate change. The purpose is to obtain certification by 2022, with 2019 as baseline, through the Greenhouse Gas Inventory Verification Program in accordance with ISO 14064-3 and ISO 14064-1, which seeks to ensure consistency of data and transparency on emissions.

The **ALEATICA Carbon Emissions Protocol**, establishes the governance and methodologies for managing and reporting greenhouse gas (GHG) emissions, in accordance with the Green House Gas Protocol (GHG), PAS 2050, ISO 14064-1 and ISO 14069 accounting and reporting standards. This protocol will allow ARM to move forward with energy consumption reduction measures and the progressive low-carbon operation of its assets.

CO ₂ e EMISSIONS	TOTAL 2019 (TON)	TOTAL 2020 (TON)	TOTAL 2021 (TON)
Direct Scope 1 emissions (tCO ₂ e)	2.714,88	2.713,10	2.906,52
Direct Scope 2 emissions (tCO ₂ e)	26,23	26,21	21,49
Direct Scope 3 emissions (tCO ₂ e)	44.222,58	20.586,37	27.115,57
TOTAL CCF	46.963,69	23.325,68	30.043,57



Scope 1. Consumption of fuels, lubricants, fire extinguishers, refrigerants, wastewater treatment and land use.
 Scope 2. Consumption of purchased electrical energy.
 Scope 3. Upstream Transportation, Downstream Transportation, Employee Transportation, Business Travel, Purchased Goods, Capital Goods, Final Disposal of Purchased Goods, Used Services.

In the estimation of the carbon footprint referenced in the table above, it should be noted that the results for the year 2020 were not taken into account in the baseline to establish the Greenhouse Gas verification program, since due to the COVID-19 pandemic it was an atypical year with a reduction in activities that are decisive for calculating the carbon footprint.

GREENHOUSE GASES	TOTAL 2021 (TON)
CO ₂	29.668,74
Non-Biogenic CH ₄	0,20
Biogenic and Anthropogenic CH ₄	343,12
Non-Biogenic N ₂ O	16,62
Biogenic and Anthropogenic N ₂ O	2,12
HFCs	12,78

By knowing its carbon footprint, the company has been able to develop its **GHG Emissions Reduction Mitigation Strategy for 2021**. In this regard, the company has committed to reduce its Scope 1 and 2 emissions by 51% by 2030 and to be a net zero emissions organization by 2050. To achieve these goals, the following actions have been identified and established:

- Implementation of renewable energy systems.
- Use of Renewable Energy Certificates (RECs).
- Study to determine the feasibility of implementing an electric vehicle fleet.
- Optimization in the use of refrigerants in air conditioners.
- Carbon footprint quantification and mitigation actions requirements.
- Compensation, restoration, and recovery of more than 1.000 ha.
- Waterway overflow protocol.
- Active drainage.
- Flood emergency protocol.
- Heat wave protocol.
- Forest fire early warning system.
- Energy source diversification, including renewable energies.
- Climate resilience through capacity building.
- Integration of climate change adaptation activities into ARM's pathway position.
- Climate change insurance strategy.
- Weather and climate hazard monitoring.

Climate Change Adaptation and Resilience

ARM is aware of the importance of having a strategy that strengthens the adaptation and resilience capacity of the business to anticipate and reduce the physical and transition risks associated with climate change. For this reason, the **Adaptation and Resilience Strategy** was generated, with an action plan starting in 2022 and a medium and long-term approach, from which the following programs and actions stemmed:

- Green infrastructure for water runoff management and soil retention.
- Cliff detection and stability monitoring system.
- Landslide protection protocol.
- Climate impacts protocol and information system.
- Intelligent transportation systems (ITS) for risk reduction and monitoring.
- Strengthening of communication systems with customers.
- Disaster scenario protocol.
- Adaptation actions and programs for local communities.
- Develop or strengthen local leadership in adaptation.



Energy Consumption and Efficiency

GRI: 302-1,302-2, 302-4, 302-5; SASB: TR-RA-110a.3, TR-RO-110a.3

Energy consumption

ARM considers it essential to contribute to mitigating climate change and the environmental impact generated by conventional energy consumption. Therefore, the company incorporates efficient technology in its lighting system and raises awareness among its employees, promoting energy-saving habits and efficient use of energy.

Electricity consumption

170.521
KWh

Gasoline consumption

80.954
liters

Diesel fuel consumption

74.971
liters

ARM is aware of the need to make progress in mitigating its impact on the environment in terms of energy. Therefore, renewable energies will be included in the **GHG emissions mitigation strategy by the year 2022.**

Water Consumption and Treatment

GRI: 303-2, 303-3, 303-4, 303-5

ARM is aware of how important it is to use water responsibly. For this reason, it has established the Efficient Use and Water Saving Program, which includes a set of management measures aimed at minimizing water consumption. At the same time, employees are made aware of the importance of caring for this resource. In addition, ARM treats the water resulting from the operation at the Puerto Berrío tollbooth through a septic tank and infiltration field, which is periodically reviewed to ensure compliance with the maximum permissible limits.

Currently, the **company's operational activities** source water is solely from the distribution network (pressurized pipes, pipelines, and irrigation ditches). **In 2021, total consumption was 337 m³, with an annual per capita average of 2,2 m³.**

The company is in the **construction phase** and carries out **road repair and maintenance activities**. As a result, an **atypical amount of water is consumed** on an annual basis, specifically for preparing concrete, hydrating embankments, washing the road, and controlling particulate material through irrigation on the project's unpaved roads, among other activities necessary to ensure the safe use of the roads. This is carried out within the framework of the Efficient Use and Water Saving Program, consuming a total of 68.099 m³ of water annually.

CONSUMED WATER	2021 (m ³)
Water consumed from the distribution network (pressurized pipes, pipelines, and irrigation ditches)	337
Water consumed from surface water (rivers, lakes, canals, reservoirs, etc.)	63.447
Water purchased from third parties or public service companies (tank truck or tanker)	4.315
Total	68.099

Waste

GRI: 103-2, 306-1, 306-2, 306-4, 306-5

To generate less environmental impact from waste generation, the company promotes integrated waste management through its Integrated Hazardous and Non-Hazardous Waste Management Procedure, which brings together the activities that contribute to a strategy of low environmental impact, efficiency, and competitiveness. Waste is disposed of in accordance with the Colombian legal framework, and the company promotes improvements through Management Plans and strategic alliances to contribute to waste recovery and generate an impact in favor of the environment, promoting good practices in business activities.

As part of the **Training, Education and Awareness Program for the Community Surrounding the Project**, in a complementary manner, activities and civic-environmental workshops are carried out to promote the acquisition of individual and collective actions for the sustainable development of the environment on a day-to-day basis. Thus, from the strategic line of sensitization and awareness, progress is made in the strategy of education, training, and environmental awareness, on issues such as the Sustainable Development Goals (SDGs), solid waste management, recycling, and civic-environmental days for cleaning and reforesting water sources.

Non-hazardous and hazardous waste and disposal

In view of the concern for the impacts generated by waste, the company has managed to recover waste with high potential to prevent it from reaching landfills as well as materials that can be

used in other processes, thus mitigating the negative impact on the environment.

NON-HAZARDOUS WASTE	2021 TOTAL KG	TYPE OF DISPOSAL
Plastics	141	Recovered
Mixed non-hazardous waste (soil, vegetable and ordinary)	205.105	Deposit areas / landfill
Paper, cardboard (office use or packaging)	190	Recovered
Electronic waste	41	Submitted to recovery process
End-of-life tires (ELTs)	380	Submitted to recovery process
Amount of scrap waste	15	Recovered

Likewise, an annual report of the hazardous waste generated by the company is made through the IDEAM platform and ensures that operators providing collection, transportation, treatment, and final disposal services have the necessary agreements, permits and environmental licenses.

HAZARDOUS WASTE	2021 TOTAL KG
Contaminated plastic waste (including packaging)	15
Oil filters	3
Contaminated absorbents (rags, sepiolite, etc.)	108
Lamps / fluorescent light bulbs	34

Ecosystems and Biodiversity Preservation

GRI: 103-2, 304-2, 304-3

One of the company's environmental commitments is to ensure the protection of the environment, working in a preventive manner to minimize the environmental impacts produced as a result of the activities carried out in the areas where it operates, respecting ecosystems and biodiversity.

As part of the Environmental Sustainability line of the Environmental and Social Responsibility Plan, the company continued recovering the ecosystems present in the territory as generators of social, cultural, environmental, and economic well-being for the area. The company continued with the maintenance work of the connecting channel between El Encanto and La Chiquita marshes, located in Cimitarra, Santander, in coordination with the fishermen associations of the area. They removed the vegetal material found in the body of water, which proliferates to a great extent and obstructs the passage of boats, in addition to withdrawing the logs and wood that fall into the navigable channel.

These ecosystems are of great importance to the area and it is necessary to keep the channel navigable so that fishermen can carry out their fishing activities.



Biodiversity Compensation

For ARM, protecting and restoring ecosystems, as well as acting responsibly and promoting respect and care for the environment is a priority. Thus, it has established compensation plans approved by the competent environmental authorities, setting out intervention

lines that will be executed in more than 1.000 hectares, aimed at compensating for the impact caused by the effects of developing the road in the area.

Reforestation in Ecologically Relevant Areas

During 2021, 65 activities with 937 participants were carried out, where 7.100 trees donated by Empresas Públicas de Medellín (EPM) to ARM were planted. These activities are called **"Sembratón"**

and were developed with strategic allies in the territory and in compliance with the protocols and biosafety measures.



Flora and Fauna Rescue and Monitoring Actions

Prior to intervening in the areas, reconnaissance activities were carried out as part of the construction activities of new roads, as well as renovation and improvement of the existing ones, where vegetation cover is being affected. Regarding the flora biotic component, saplings and poles were rescued, and epiphytes were rescued, removed, and relocated. The relocation of these individuals ensures that they can adapt to the environment in areas of floristic enrichment.

For wildlife management, prior to the interventions, the environmental crews perform preliminary work, where the wildlife professional undertakes activities to help, rescue or relocate species that could be impacted by the project.

ARM uses information panels to disseminate messages to raise awareness among customers about the passage of wildlife along the road corridor.

By 2022, the company plans to have three arboreal wildlife crossings and two terrestrial wildlife crossings on the operational road. It also plans to implement preventive signage warning of the presence of wildlife. Other plans are in place to raise awareness among road customers and communities through campaigns about the importance of wildlife, bearing in mind that it is everyone's responsibility (customers, operators, and local and regional authorities) to ensure the protection and care of wildlife as an invaluable natural resource of the nation.

All of the flora and fauna rescue and monitoring actions comply with environmental instruments such as the Environmental Guidelines' Environmental Management Plans, Environmental License, and Adaptation Plans.

...by means of **information panels**, the company **disseminates messages** that seek to raise awareness among **the road customers about the passage of wildlife** along the road corridor...



Environmental Emergency Response

GRI: 201-2, 307-1

The Emergency Preparedness and Response Plan DOS-PRCS-08 includes the analysis of possible emergency situations that may occur in the work centers, establishing the necessary measures to prevent their occurrence and that, in the event of a potential emergency situation, the company can respond appropriately to minimize the damage to the environment and ensure that such damage can be controlled and mitigated.

This plan contains a set of guidelines and directions that are applied in all ARM's work centers with the project's own particularities and risks. In this way, the company complies with national regulations on the evaluation of environmental threats and risks, which is communicated to all personnel through corporate induction.

Supply Chain

Procurement Structure

Taking into account that the supply chain of a company like ARM is centered on the suppliers that provide all the necessary inputs to operate the road under concession, it is becoming more and more strategic to consolidate the relationship with suppliers in order to be more efficient every day.

For this reason, ARM has a Procurement Controller who is responsible for the supervision and control of the procurement and hiring process.

In 2021, the company had 327 suppliers, of which 99% were local suppliers and 1% were foreign suppliers. The total expenses incurred for the year 2021 correspond to \$288.782.892.106 Colombian pesos before VAT (€63.422.143). The report does not include the

costs associated with internet, telephone, energy, water, television, radio, and cleaning services. Likewise, those related to financial and legal advisory services, and the costs derived from lodging, travel expenses, transportation (air), and canteen supplies.

In order to maintain the best service standards, during 2021, the procurement process was supervised through the Supplier Approval, where suppliers are certified from the technical, financial, legal and compliance point of view. Each purchase is approved in accordance with the approval flow defined in the **Delegation of Authorities Policy**.



Supplier Evaluation

GRI: 103-3

In order to ensure the continuity of the operation and service to the customers, during 2021, ARM continued to carry out a risk assessment, identifying and classifying among the operational risks those arising from contracts entered into for executing the construction, managing the road operation, as well as labor, environmental, social, technology and systems aspects.

Supplier compliance with the standards of conduct and the Code of Ethics is permanently required and is formalized through the signing of contracts, purchase orders and/or services, which include a clause on knowledge of and compliance with the company's Code of Ethics. Additionally, a due diligence evaluation process is carried out for suppliers exceeding \$22 million Colombian pesos, in order to formalize their good practices.

The Code of Ethics includes, among others, respect for and compliance with the following guiding principles:

- Respect for legality.
- Respect for human rights.
- Equality and non-discrimination.
- Diversity
- Occupational health and safety
- Eradication of child and forced labor
- Privacy of personal data and confidential information
- Respect for free competition
- Prevention of money laundering and terrorist financing
- Environmental protection

Additionally, it includes a commitment to avoid any form of corruption and to scrupulously comply with all applicable anti-bribery and anti-corruption laws, regulations, and procedures, as well as to follow the recommendations of international organizations such as the OECD and the United Nations.

In order to strengthen and improve our suppliers' due diligence process as well as to ensure the proper measurement of risks that

may arise from the potential contractual relationship, the **RHS-NORM-20 Supplier Approval, Registration and Evaluation Standard** Standard is applied to suppliers according to their classification, based on the amount of the purchase or contract.

ARM does not classify suppliers as "critical" or "non-critical", instead they are reviewed to ensure that they comply with technical, financial and compliance requirements, which have been defined in **RHS-NORM-20 Supplier Approval, Registration and Evaluation Standard, as applicable.**

Therefore, through the technical, legal, financial and compliance evaluation, risks associated with compliance, legal, regulatory, or reputational principles or facts are identified. In the financial analysis, solvency, liquidity, and indebtedness ratios are calculated, based on the financial statements of the third party (supplier) and qualitative information available regarding news on incidents, and financial capacity is assessed. Finally, the technical perspective is based on internal information sources, such as previous experience, and external sources, such as project references, incidents, and degree of conflict.

During 2021, all our purchasing processes have been strengthened, providing legal certainty, through the signing of service contracts in accordance with the standards established by national legislation, as well as our regulations.

To ensure that there are no suppliers with significant risk in the operation, through the application of due diligence, during 2021 ARM continued to request suppliers to sign the Responsible Declaration, issued by the Compliance area, where they declare to be within the legal framework and agree to adhere to company's Code of Ethics and the Anti-Corruption Policy.

No operations owned by the company or its suppliers were identified as **involving child labor, forced labor or human rights violations.**

In 2021, pursuant to the classification established in the **RHS-NORM-20 Supplier Approval, Registration and Evaluation Standard**, suppliers continued to sign an external questionnaire for the third party due diligence process (suppliers), issued by the Compliance area, thus ensuring that no operation and/or supplier registration was carried out outside of the regulations. This questionnaire includes information on the control procedures and policies implemented to ensure that suppliers comply with national legislation, as well as safety, labor, and human rights aspects, with respect to their employees.

In 2021, ARM suppliers were evaluated on environmental and occupational health and safety issues, identifying the risks that could potentially materialize during the execution of the activities established within the contractual scope. Based on this identification, ARM included the environmental and occupational health and safety obligations that they had to comply with while performing their duties, with the respective compliance clauses.

However, by 2022, the following will be implemented in the **Supplier Approval, Registration and Evaluation Standard**

- **Sustainability Assessment** that, during the Supplier Approval process, allows confirming the supplier's risk (low, medium, high) in environmental matters for carrying out the service. This assessment must be carried out for suppliers providing services related to:
 - Execution of social or environmental projects.
 - Major or minor maintenance projects.
 - Construction or demolition projects.
 - Leasing of major and minor machinery or vehicle fleets.

Once the supplier has rendered its service (totally or partially), the company will carry out the **Supplier Service Evaluation** in which, among other topics, reagents related to Sustainability will be analyzed.

Additionally, in 2022 the company will implement the **Responsible Sustainability Statement**. The Supplier will be bound to comply with environmental and social care and, in that sense, work to reduce the social and environmental impact of its operations and promote responsible behavior throughout its value chain.

The person in charge of the Requesting Area shall contact the person in charge of Environmental or Sustainability Control, indicating the supplier's name, contact information and the scope of the service or product to be hired. With this information, ARM's Environmental or Sustainability Control Manager will request from the supplier the documents on environmental regulatory compliance that are applicable according to the scope of their services and products offered. Once the sustainability assessment has been carried out, the Environmental Control Manager will issue the certificate with the associated environmental risk.

The following basic principles of supply chain management have been defined in the **Purchasing and Contracting Standard**:

- **Principle of competition:** A minimum of three Stakeholders shall be invited to participate in the Procurement process, unless otherwise expressly permitted by this regulation. The invited candidates must have a homogeneous and sufficient performance level for the execution of the contract so that, as a matter of fact, ALEATICA should be willing to engage with any of them. Unless there are justified reasons, suppliers that, according to previous experience, have obtained an "unreliable" evaluation, issued under the terms of RHS-NORM-20 Supplier Approval, Registration and Evaluation Standard, shall not be invited.

- **Principle of publicity, equal treatment, and non-discrimination:** Requires that the call for bids be made known to the interested parties under the same conditions, providing the same information and received with equal anticipation prior to the day of submission of bids. It also requires that the selection be carried out taking into account objective criteria, mainly of a technical (safety processes, proven experience, execution time) and economic nature.
- **Principle of confidentiality:** The selection process shall take into account criteria of maximum confidentiality. No information provided by the companies participating in a selection process may be disclosed. Likewise, the company will not provide confidential information or information that includes personal data except when justified and after signing a Confidentiality Commitment.
- **Principle of efficiency:** Adequate and timely contracting is essential for the fulfillment of the objectives. For this reason, the procedures described in this document must be carried out in a timely and expeditious manner.
- **Principle of transparency:** The evaluation criteria will be expressly indicated in the Letter of Invitation, unless the Director of the Requesting Area understands that it is in the best interest of the tender not to share them with the interested parties. On the other hand, once the supplier has been selected and the contract signed, the Responsible of the Requesting Area will notify the remaining unsuccessful candidates of the award. This communication will briefly indicate the criteria that have been considered for the selection, without sharing the specific conditions and terms of the winning bid.
- **Principle of Documentation:** All actions of every procurement process shall be documented, so that they may be recorded and may be subject to review and verification.
- **Principle of Sustainability:** Suppliers will be asked for the social -safety and labor- and environmental regulatory commitments that by law they must comply with, as well as the support of this compliance or monitoring. Additionally, once the participating company is contracted, the company reserves the right to carry out any review, audit or verification of the information requested in this process, in which the supplier may be asked for information and documentary evidence to

prove and ensure that the company has actions aligned with the international sustainability standards to which the company is committed, and monitor ESG aspects (environmental, social and corporate governance) that allow the company to gradually comply with the indicators related to suppliers and the supply chain, avoiding any conduct that, even without violating the law, could damage the reputation of the participating company and consequently, ARM's own. This Principle was integrated into the latest update to the Standard and will be implemented in 2022.

From a social perspective, ARM's **Procurement and Contracting Regulations** define the **Principle of publicity, equal treatment, and non-discrimination:** It is required that the call for bids be made known to the interested parties under the same conditions, providing the same information and received with equal anticipation prior to the day of submission of bids.

By 2022, the company's goal in the Procurement Area is to work with suppliers that comply with environmental and social legislation. For this reason, within the process of acquiring goods or services, the **Declaration of Responsible Sustainability** will be shared with each supplier/contractor, and the sustainability criteria will be included in the supplier's evaluation.

Commitments and Goals for the Future

The objectives projected from ARM are:

- Structuring activities aimed at reducing social risks and impacts that may be generated during the execution of the contract.
- Contribute to the strengthening of communities through road connectivity as part of the economic development of the region.
- Build trust and credibility between the communities, the company, and the government entities responsible for the project.
- To be part of the stakeholders seeking social improvement in the region through competing with local players present in the project's municipalities of influence.
- Contribute to the region by providing mechanisms that facilitate an effective and constructive relationship between the communities and the project.
- Achieve synergies with national and regional public entities in the pursuit of the fulfillment of their goals and articulating their efforts with the project in a structured manner.
- Provide timely attention to the road customers and communities in the project's area of influence, in order to satisfactorily respond to their needs and concerns during each stage of the project.
- Reduce the lack of information and the generation of false expectations in the project's community of influence through accurate and truthful information provided by the project's personnel.
- Contribute to improving the quality of life by generating employment, linking personnel from the area of influence directly in the execution of the works.
- Strengthen relations with the project's communities of influence by structuring effective communication processes and strategies to keep citizens permanently informed, seeking acceptance and ownership of the project.
- Provide comprehensive support to the social units involved in the process of requiring land plots for the project, during the adaptation and appropriation of new places of residence, as well as for the development of productive activities that will allow them to maintain and/or improve their living conditions and economic sustainability.



Under the slogan **“If it's not sustainable, it's not real development”**, the company aims to establish a comprehensive **social and environmental sustainability agenda** to ensure the momentum of **measurable contributions to the 2030 Sustainable Development Goals.**

Corporate Integrity

GRI: 103-2, 205-1, 307-1



Introduction

Autopista Río Magdalena S.A.S. (ARM) understands that integrity, transparency, and corporate governance are basic principles that should characterize the way the company does business. ARM wants its customers, employees, suppliers, and allies, as well as the authorities and communities in the area of influence of the project, to consider it as a reliable partner. To this end, the company has the support and experience of **ALEATICA**, as one of its shareholders, which is a signatory of the United Nations **Principles for Responsible Investment** and constantly monitors ARM's operations.

ARM's governing bodies are aware of the integrity and transparency that must govern the company's actions in everything it does. These bodies have a direct participation in the decisions that make possible the creation of a **Corporate Governance** that adopts the most recent standards, consequently seeking the implementation of corporate policies that reflect the aforementioned.

Main Achievements

In recent years, with the support of the Board of Directors and the company's Senior Management, the Legal Department has made a great effort to promote the Compliance program within ARM, as well as to foster transparency and integrity in the company and to reassure third parties about the way ARM operates.

These efforts became a reality in 2021 through the following actions:

- Provide adequate support to all areas of the company that have required it.
- Carry out and/or coordinate an adequate defense of the company's interests when required.
- Manage an adequate relationship with the granting entity, when required.
- Follow up on Due Diligence - DD in the procurement processes.



Corporate Governance

GRI: 102-18, 102-24

ALEATICA, S.A.U., is a Spanish company based in the city of Madrid, which indirectly is the controlling entity of Autopista Río Magdalena S.A.S. and holds participation and control over all the shareholders of the latter. ALEATICA has subsidiary holding companies from which in turn the concessionaire companies in the following countries derive: Spain, Mexico, Colombia, Chile, Peru, Luxembourg, and Italy. The legal nature of ALEATICA, S.A.U. is that of a sole shareholder corporation.

Autopista Río Magdalena S.A.S.²¹ is currently the concessionaire in charge of the project Autopista al Río Magdalena 2, through Concession Contract 008 of 2014, signed between this company and the National Infrastructure Agency (Agencia Nacional de Infraestructura, ANI).

Autopista Río Magdalena S.A.S.

The governance structure of the organization is as follows:

1. Stockholders' Meeting:

- a. ALEATICA SAS (Colombian Company)
- b. ALEATICA SA (Chilean Company)
- c. ALEATICA SAU (Spanish Company)

2. Board of Directors:

- a. Carlos Lorenzo García-Faure - President²²
- b. Pablo Ybañez Rubio
- c. Joaquín Gago de Pedro
- d. Hermenegildo Moreno Loriente (independent member)

3. Legal Representatives (Managers and alternates):

- a. Alejandro Niño Arbeláez, CEO and Legal Representative
- b. Joaquín Gago de Pedro, Manager and Legal Representative
- c. Carlos Lorenzo García-Faure, alternate to the Chief Executive Officer and Legal Representative

4. Area Directors:

- a. Natalia Zuluaga, Director of Planning and Financing
- b. Julián Arbeláez, Director of Operations
- c. Javier Seara, Director of Construction
- d. Gustavo Chaverra, Director of Administration and Finance
- e. Hernán Santana, Legal Director

The Board of Directors is made up of **four members**, of which, in accordance with ALEATICA's policies and in compliance with the concession contract, twenty-five percent (25%) are independent members.

²¹ The Simplified Joint Stock Company (Sociedad por Acciones Simplificada, SAS) was created in the Colombian legislation by Law 1258 of 2008. It is a capital company, commercial in nature, which may be incorporated by means of a contract or unilateral act and which will be recorded in a private document.

²² The Chairman of the Board of Directors is ALEATICA's Regional Director for Latin America.



Regulatory Assessment and Compliance

In each functional unit and stage of the project, ARM guarantees to have the required environmental licenses, other permits and all matters related to the acquisition of the right of way. For operations, the compliance focuses on the fulfillment of the indicators established in the concession contract and current legislation.

Zero Tolerance to Corruption

GRI: 103-2, 205-1, 205-2, 205-3

In 2021, ARM provided trainings for its employees on Compliance topics such as:

- Conflict of interest
- Anti-corruption
- Use of the ethical channel

All members of the governing bodies, as well as all ARM managers and employees, have been informed and trained on the company's anti-corruption policies and procedures.

Important communication and awareness-raising actions have also been carried out in the areas of anti-corruption, dealing with public officials and fraud prevention, issuing periodic communications through the company's internal newsletter, as well as through e-mails.

All third parties with whom the company works sign a responsible statement on, among other things, anti-corruption issues, which also includes a link to the Anti-Corruption Policy. In addition, specific clauses addressing anti-corruption issues are also included in all contracts.

ALEATICA's Risk Management together with ARM's management performs an annual corruption risk assessment both at corporate level and for the different business units. In this process, the main potential risks related to corruption have been identified. These include bribery, influence peddling and corruption in business, being assessed with a very high risk due to ARM's type of business, which, among other things, involves the relationship with public officials. Notwithstanding this assessment, and given the evolution of the business, it has been established that the incidence of these risks in ARM is low.

ARM has a policy of not making any contributions to politicians and/or their parties.

This can be seen in the Anti-Corruption Policy, available by clicking on the following link:

https://www.autopistamagdalena.com.co/wp-content/uploads/2022/03/Politica-Anticorrupcion_ES-1-SM.pdf (See section 4 of the ALEATICA principles against corruption).

In 2021 the company reported a case investigated for not being in accordance with the company's compliance policies, which developed around an accident involving a customer on the road and a livestock. After due process with the employee, the respective disciplinary measures were taken.

Regarding contractors and third parties, in 2021 there were no cases contrary to the company's compliance policies associated with the activities contracted or developed.

In addition, there were no public legal cases related to corruption brought against ARM or its employees.





Crime Prevention Model

GRI: 103-2

At ARM, together with ALEATICA, continuous training processes are implemented for all personnel, emphasizing the commitments of the Code of Ethics and the Anti-Corruption Policy.

Furthermore, employees, contractors, third parties and other relevant stakeholders are informed of ARM's whistleblowing mechanisms and channels.

Prevention of Money Laundering and Terrorist Financing

As established in the Code of Ethics and the Anti-Corruption Policy, ARM personnel at all levels are obliged to perform Due Diligence on all new employees, contractors, and suppliers, taking preventive

care of conducts that may be related to money laundering and the financing of terrorism, and cooperating with the competent authorities whenever deemed necessary.

Code of Ethics and Ethics Channel

The **Code of Ethics** establishes the guiding principles for the behavior of all ARM's stakeholders. It guides ARM's relationships with its stakeholders: partners, customers, employees, suppliers, contractors, allies, authorities, communities and any other group

or person related to the project. Everyone who is part of ARM, without exception, is committed and obliged to know the Code and strictly comply with it.



To learn more about the **Code of Ethics** click here:

https://www.autopistamagdalen.com.co/wp-content/uploads/2022/03/Codigo_Etico_ES-SM.pdf



Ethical Channel

GRI: 102-17, 411-1, 418-1, 419-1

Through the platform made available by ALEATICA, this channel is accessible to all the people who are part of ARM and to all its stakeholders. The aim of this channel is to guarantee independence, confidentiality, and objectivity, as well as to ensure the anonymity and protection of the customers. Upon receipt of any report, the Compliance Department responds to the informant stating that it has been received and, if necessary, requesting additional information.

Should the company decide to conduct an investigation, it will appoint an investigation manager based on the nature of the allegation. The investigation manager then involves those areas deemed necessary to develop the investigation and determines whether it is advisable to adopt precautionary measures while the investigation process is being conducted and resolved.



In 2021, **ARM did not receive any complaints** related to the project.

At the beginning of 2022, there will be a change in the management of the Ethical Channel, evolving towards a new platform operated by **Convercent**, an external company devoted to managing ethical channel platforms of multiple companies around the world, providing all quality warranties when delivering its services.

The new channel is called **I CARE**. This name has been chosen to reflect a shared commitment. As a company, ARM cares about what each employee and stakeholder have to say, whether it is denouncing an unethical or illegal behavior, a query, or a question. Employees care about their source of work and have a personal commitment to take care of it and report any unethical or illegal behavior that sets the company at risk in any way.

The following means of contact are available to make inquiries or report illegal behavior, inconsistencies, and non-compliance with ARM's internal policies and/or the Code of Ethics:

Intranet > Integridad Corporativa > Canal Ético I CARE
Internet: <http://icare.aleatica.com/>
Telephone: Colombia: (+57) 601 3816523

ARM's governing bodies are aware of the standards of transparency and integrity that must govern the company's performance. To this effect, these bodies have a direct participation in the decisions that allow the creation of an updated corporate governance through the approval of corporate policies.

In addition, ARM's internal procedures have been developed so that the governing bodies receive independent information from ALEATICA's Compliance and Internal Audit Departments, which permanently support all ARM's Compliance actions, thus allowing for an assessment of the state of compliance in different aspects of corporate life.

Periodically, campaigns are carried out to promote the use of the Ethics Channel among the different stakeholders, explaining the ways in which the channel can be accessed, the possibility of anonymous reporting, and the **Zero Tolerance to Retaliation Policy**.

During 2021, ARM did not receive any reports related to the violation of human rights, rights of indigenous peoples or non-compliance with laws and regulations in the social and economic areas.

Conflict of Interest

GRI: 102-25

The Anti-Corruption Policy determines the procedure for reporting a conflict of interest that may arise in any of the activities carried out by employees, establishing that the hierarchical superior with a minimal status of Director must be informed, who in turn must report it to Compliance. This same regulation provides for the Ethical Channel to be used as a means to communicate possible or potential conflicts of interest. In addition, board members and officers annually complete a declaration of interests including information on professional activity in entities other than ARM, affiliations, family members' interests, etc., and a review is conducted to determine if there is an actual conflict.

In the event that an employee or board member becomes involved in a conflict of interest, they shall:

1 Communicate the conflict of interest to the Compliance Department as soon as the potential or actual conflict of interest with business relationships with customers, suppliers or any other organization with which ARM has any kind of relationship is known.

2 Said communication to the Compliance Department must be made in writing by the employee or director involved in the conflict of interest or who must make the decision.

3 Act diligently with respect to the conflict of interest until it is resolved. Thus, as soon as the employee has notified the existence of a conflict of interest, the following measures must be taken:

- Refrain from making decisions that could undermine ARM's decision-making processes.
- Refrain from using the information obtained in the performance of their duties at ARM for their own benefit or for the benefit of third parties.

Compliance will analyze the information on the conflict of interest to determine the impact of establishing a business or employment relationship where such a conflict exists. To date, there have been no cases of conflict of interest in ARM.

Unfair Competition

GRI: 206-1

Unfair competition is not allowed in ARM, as well as any other practice that goes against good business faith and does not comply with the necessary ethical standards to be considered honest.

In 2021, ARM has not been subject to investigations, actions or litigation for unfair competition, monopolistic practices, or anti-competitive practices.

Human Rights

GRI: 103-2, 410-1

Through the **Human Rights Policy** the company establishes an institutional commitment to respect and protect the Human Rights of its employees, customers, suppliers, communities, and any other stakeholder related to ARM.

The following are the main initiatives and guidelines that serve as a basis for working and ensuring compliance with human rights at all times: The following are the main initiatives and guidelines that serve as a basis for working and ensuring compliance with human rights at all times:

- Universal Declaration of Human Rights.
- United Nations Global Compact.
- Tripartite Declaration of the International Labor Organization (ILO) concerning Fundamental Principles and Rights at Work.
- OECD Guidelines for Multinational Enterprises.
- United Nations Guiding Principles on Business and Human Rights.

ALEATICA Human Rights Principles, which have been adopted by ARM:

- Eradicate forced labor.
- Work for equality and fight discrimination.
- Provide decent work.
- Ensure the health and safety of people.
- Respect minorities and indigenous communities.
- Promote freedom of association and collective bargaining.
- Eradicate child labor.
- Protect people's environment.
- Physical security, security companies and Human Rights.

The following are the actions taken to prevent and address any violation of human rights:

- Compliance with applicable labor legislation and procurement processes for goods and services.

- Code of Ethics, governing the conduct of all employees.
- Responsible Procurement Policy, which includes clauses to ensure respect for and protection of Human Rights.
- Human Rights clauses, aligned with compliance with labor, environmental and occupational safety regulations.
- Clauses in all employment contracts, requiring recognition of the Code of Ethics.
- Questions, queries or complaints through the Ethical Whistleblower Channel via the Internet and telephone.
- Analysis of the work environment in work centers to prevent and resolve any situation that could result in a violation of employees' human rights.
- Processes and practices have been adopted to ensure the respect and protection of Human Rights, the right to free association and the eradication of forced and/or compulsory and child labor.

Human Rights training for Physical and Property Security personnel

As part of the training strategy for the Physical Security area, the company is demanding that security companies that provide services to ARM and construction companies provide training in human rights, use of force and application of security regulations under the parameters of Colombian law.

The inclusion of this type of training is valued in the terms of reference of the tenders managed by the Procurement areas of the Business Units. It is estimated that 100% of these personnel have received some type of training in Human Rights.



Commitments and Goals for the Future

Currently, ARM has a solid Compliance program, based on international best practices. The area's efforts for the next three years are focused on consolidating a Compliance culture throughout the organization, encouraging reporting, and making processes more efficient, whilst maintaining the required rigorousness and strengthening participation as a strategic ally in all business operations.

ARM shall ensure compliance with Colombian regulations, as well as its interests. Additionally, ARM adopts the policies of ALEATICA, among which are those related to Compliance matters.

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The entire ALEATICA team has dedicated great efforts to accelerate the company's path to **become a flagship and an accountable company.** This vision has enabled the company to evolve into an **increasingly recognized global transportation infrastructure platform.**

-Kenneth Frederick Daley

Chairman of the Board ALEATICA S.A.U.

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