

Human Rights Policy

Approval: Board of Directors
No. 379 of August 5th, 2022



Construcciones
EL CONDOR S.A.
Ingeniería de Infraestructura e Inversiones

PRELIMINARY CHAPTER

Construcciones El Cóndor S.A, establishes within its Superior Purpose to be a sustainable alternative in the management of Engineering and Infrastructure projects and profitable investments; in a framework of transparency, respect for the law and development of all its stakeholders, to contribute to the development and growth of the country.

The adoption of this Policy by Construcciones El Cóndor S.A. (hereinafter "the Company"), seeks to determine and communicate the commitments of the Company and the Business Group of which it is the Parent Company, in relation to the respect and guarantee of human rights in all its activities.

For the preparation of this Policy were taken into account, among others, the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, the International Covenant on Economic, Social and Cultural Rights, the fundamental principles and rights at work established in the Declaration of the International Labor Organization (ILO), the Equator Principles, the OECD Guidelines for Multinational Enterprises, the objectives of sustainable development and other standards applicable in Colombia and in other countries where the Business Group has or will have active operations.

CHAPTER I

GENERAL PROVISIONS

ARTICLE 1. Scope of application. This Policy applies to the Company and the other companies that conform the Business Group. For those companies where the Company does not exercise control, the Company will promote its implementation through its participation in the company, if possible.

The declarations and commitments of the Policy constitute a guideline of behavior for all the administrators, collaborators, contractors, and suppliers of the Company.

ARTICLE 2. Declaration. The Company commits to protect and respect human rights in its relationship with its stakeholders, abiding by what is enshrined in the International Bill of Human Rights and the ILO declarations, as well as in the regulatory provisions of the countries where it has presence.

Consequently, the Company expressly commits to:

IN RELATION TO EMPLOYEES

1. Being a reference employer, respecting the rules established in the regulations in force in Colombia and in the countries in which it has active operations, especially in relation to the maximum working time, rest periods, decent salary, paid leaves, and formal employment.
2. Not participate in any form of forced labor or servitude. The labor relationship with its employees is duly regulated within the limits established by Colombian law and in general, under the applicable law in the country where it operates.
3. Provide the mechanisms required for the protection of employees against any form of harassment, abuse, intimidation, or violence in any of its manifestations.
4. Guarantee safe work environments, providing the training and protective equipment required by law for the safe performance of work, complying with the standards and procedures regarding occupational health and professional risk prevention.
5. Reject all forms of discrimination based on race, ethnic origin, nationality, citizenship, religion, creed, political affinity, gender, sexual orientation, disability, age, marital status, or socioeconomic status.
6. Promote gender equity, seeking for the equality of opportunities at work.
7. Promote the proper balance between work life and personal and family life.
8. Guarantee the compliance and respect for labor disconnection, respecting the rules established in the regulations in force in Colombia and in the countries in which it has active operations.
9. Reject child labor, verifying and complying with the legal limits for the minimum age to work, according to the labor regulations of the country of operation.

IN RELATION TO SUPPLIERS AND CONTRACTORS

1. Promote the formalization of the commitment of suppliers and contractors with human rights, encouraging safe work environments and equal opportunities, free from harassment in any form, guaranteeing compliance with labor rights and associated regulations.
2. Include specific clauses on respect for human rights in the contracts established with suppliers and contractors.
3. Communicate this human rights policy among its suppliers and contractors, especially among those whose origin, activity or relevance to the Group recommends it.

IN RELATION TO THE COMMUNITY

1. Publicly promote respect for human rights, with special attention to the vulnerable population located in the influence area of the places where the Company carries out activities or works.
2. Seek to minimize the socio-environmental impacts in all operations and, for this purpose, monitor the related impacts.
3. Make our investments in a sustainable way and promote value initiatives to promote social inclusion, respecting the rights of local communities, contributing to their economic and social growth.
4. Respect the right to free and informed prior consultation in accordance with current law, as well as the promotion of social inclusion actions such as the involvement of local labor and collaboration with local actors.

IN RELATION TO CUSTOMERS

1. Guarantee the quality of the activities and operations in a way that promotes and prevents the affectation of human rights such as the life and health of all users, for this, the Company is committed to complying with all the technical specifications ordered by legal regulations in force.

ARTICLE 3. Special Declaration. The Company expressly declares that it will not recognize as a valid interlocutor, nor will it establish any type of commercial or institutional relationship with illegal groups or with actors outside the law.

ARTICLE 4. Personal Data Protection. The Company recognizes and protects the right of all people to know, update and rectify the information that has been collected about them in databases or files owned by the Company, and undertakes to apply the provisions of its Personal Data Protection Policy, and to promote the adequate and restricted use of the information.

CHAPTER II

DISCLOSURE AND EVALUATION

ARTICLE 5. Disclosure. This Policy and any modification made to it from time to time will be disclosed to stakeholders through the established relationship mechanisms and will be consolidated in the annual management report.

ARTICLE 6. Information Obligation. Every administrator, employee, contractor and supplier of the Company has the obligation to report any conduct that contravenes the provisions of this Policy through the Company's ethics line, which includes the following channels:

- etica.elcondor@resguarda.com
- 01-800-752-2222

ARTICLE 7. Evaluation. The results of compliance with this Policy will be reviewed at least once a year by the Sustainability area, who will present the results of the evaluation to the Board of Directors.