

		CHARACTERIZATION			
Date of Update		Process	Due Diligence in Human Rights		
Objective	Identify, prevent and address potential and/or real risks arising from the company's activities that could violate the human rights of related stakeholders, as well as the opportunities that could favor them.				
Scope	This starts with the establishment and/or updating of the institutional commitment, the identification and management of risks and opportunities in human rights in all processes, and the monitoring of performance, and ends with the remediation for those cases that cannot be avoided.				
Process Manager	Legal Area	Responsibility and authority of the process	Senior Management		
Monitoring and Measurement	Dashboard of indicators, follow-up through internal and external audits, Risks and opportunities				
Resources	Financial: budgets, G&A, AFES, OPEX.	Equipment and infrastructure: computer equipment, offices, telecommunication equipment	IT: internet	Human: Manager, Coordinators, Supervisors, Specialists, Professionals, Analyst, Operators External Advisors	Other:
INPUTS		DESCRIPTION		OUTPUTS	
Contribution/Stakeholder	Description	Activities (PHVA)		Description	Recipient/ Stakeholder
INSTITUTIONAL/POLITICAL COMMITMENT					
Senior Management Legal Area Stakeholders	Requirements in application of the framework of action in human rights, expectations of investors, business relations, industrial sector.	<b>Content of the policy:</b> List or make reference to documents, declarations or instruments of human rights, such as the Guiding Principles of Businesses and Human Rights, the Voluntary Principles on Security and Human Rights, the Universal Declaration of Human Rights, the International Agreements on Civil and Political Rights, as well as on Economic, Social and Cultural Rights, the conventions of the International Labor Organization, the ILO Declaration on Fundamental Principles and Rights at Work, and the Global Compact Principles.		Document with an explicit commitment to incorporate due diligence according to the standards involved and to remedy adverse impacts should they occur.	Senior Management Stakeholders The whole Organization
Senior Management Legal Area Strategic Planning Human Talent		<b>Process of preparation and/or updating:</b> approve the policy at the management level and communicate it to stakeholders (employees, partners, authorities at the national and local levels, and their suppliers)		Document with approval at the management level and dissemination and training strategy favoring the organizational culture to ensure due diligence in human rights.	
Senior Management Legal Area Stakeholders		<b>Differential approach:</b> Consider specific groups or populations that require special attention (for example, women, children, indigenous peoples, minorities, persons with disabilities), as well as population groups that		Document with an explicit commitment to incorporate the differential approach.	

		demand greater attention such as the United Nations Declaration on the Rights of Indigenous Peoples, the Convention on the Elimination of All Forms of Discrimination against Women, the Convention on the Rights of the Child, ILO Convention 169 on Indigenous and Tribal Peoples, among others.		
<b>IDENTIFICATION OF IMPACTS/RISKS AND OPPORTUNITIES</b>				
Social Management Sustainability/Process Characterization Planning, Analysis and Risk Management Sustainability/quality Legal Area Stakeholders	Need to integrate the human rights due diligence approach into the risk and opportunity management process across the organization.	<b>Characterization or knowledge of the environment:</b> Develop a baseline allowing to know and understand the social, political, cultural, environmental and economic conditions of the area of influence, incorporating relevant information for the identification of possible impacts on the enjoyment of human rights of stakeholders, also incorporating, with differential approach, the possible impacts that the operation may have on vulnerable populations or populations that require a particular treatment depending on their ethnicity or culture, political affinity, sexual orientation, age and gender, among others. The analysis must include entities at the national level and authorities at the local level with which it is necessary to coordinate in order to prevent the materialization of impacts.	0	The whole organization. Stakeholders
Social Management Sustainability/ Process Characterization Planning, Analysis and Risk Management Sustainability/Quality Legal Area Stakeholders		<b>Identification of impacts:</b> Proactively and constantly identify the risks and opportunities of human rights activities, and update the identification at key moments (for example, policy change, new projects, among others).	In accordance with the guidelines of risk management and opportunities of the organization.	The whole organization. Stakeholders
<b>IMPACT/RISK AND OPPORTUNITY MANAGEMENT</b>				
Planning, Analysis and Risk Management Sustainability/Quality Legal Area Stakeholders The entire organization	Integration of findings of human rights risks and impacts into relevant internal functions and processes, through the adoption of appropriate measures	<b>Integration of the Human Rights Approach:</b> Incorporate the human rights approach associating impacts with rights and prioritize based on the criticality and severity that these represent, including within its Tools (risk matrix) for the weighting of risks the rights affected; the number of people that would be affected if the risks materialize; the	Matrix of risk and opportunities associated with human rights by process.	The whole organization. Stakeholders

	to prevent, mitigate or remedy.	presence of particularly vulnerable populations; and the remediable or irremediable nature of the impact.		
Legal Area Social Management Sustainability Administrative Management		<b>Coordination with Stakeholders:</b> Coordinate prevention, mitigation and remediation actions with entities of the national level, local authorities and other companies, to achieve synergies and effectiveness in treatment measures.	Coordination protocols.	Government, Surveillance and Control Agencies
Legal Area Supply		<b>Value chain:</b> Ensure that contractors know and understand the impacts identified, the measures defined and the behavior expected of them in the framework of due diligence management, including specific human rights clauses in the terms of reference to be published, as well as in the contracts to be signed with suppliers.	Terms and conditions, attachments, addendums.	Contractors and Suppliers
Legal Area Sustainability Social Management Administrative Management		<b>Internal and External Communication:</b> Externally communicate the impacts identified and management measures, especially for potentially affected stakeholders, this through differentiated communication strategies.	Communication and dissemination strategies according to the communication procedure and relationship protocols.	Stakeholders
<b>PERFORMANCE MONITORING</b>				
Senior Management Legal Area Planning, Analysis and Risk Management Sustainability/Quality		<b>Indicators and Processes:</b> Establish specific qualitative and quantitative indicators within an ongoing process for follow-up on management of human rights impacts, also monitoring and evaluating changes in the baseline or contextual analysis.	According to the guidelines of the Current Risk and Opportunity Planning Process for the evaluation of the effectiveness of the management framework.	Senior Management The whole organization Stakeholders
Legal Area Planning, Analysis and Risk Management Sustainability/Quality Sustainability Social Management Administrative Management	Need for follow-up on management of human rights impacts.	<b>Follow-up tools:</b> Integrate follow-up to internal and external audits and make consultations, interviews, focus groups, surveys, among others, to identify the perceptions of stakeholders as to risk management progress.	Communication and dissemination strategies according to the communication procedure and relationship protocols.	Stakeholders
Sustainability/Quality		Integrate the follow-up to internal and external audits	According to the guidelines of the Current Risk and Opportunity Planning Process having as base the evaluation of performance indicators, post-audit exercises.	Senior Management The whole organization Stakeholders

Legal Area Supply		<b>Value Chain:</b> Include within the performance evaluation criteria of contractors or suppliers, the completeness of the measures adopted by them to guarantee respect for human rights.	Mechanisms for verification of compliance with the standards agreed for suppliers, contractors and subcontractors with respect to human rights due diligence	Contractors and suppliers
<b>IMPACT REMEDIATION</b>				
Senior Management Legal Area		<b>Petitions, Complaints and Claims System:</b> Develop a PQRS [Spanish initials for Petitions, Complaints and Claims] system that may be recognized by the different stakeholders as a channel through which they will obtain response and solutions to the situations raised, classifying the PQRS received and identifying which of them involve impact or possible impact on a human right, constantly analyzing and identifying gaps and opportunities for improvement.	PQRS System	Stakeholders
Legal Area Crisis Committee	Need for procedures to provide remediation for a negative impact on human rights and seek substantive results that may counteract, or transform into positive, such impacts.	<b>Mechanisms for Reparation and Restitution of Rights:</b> Establish remediation formulas adjusted to the internationally recognized rights and effectively coordinate with the institutions to restore rights in those cases in which the intervention of national or local entities is required.	State and non-state claim mechanisms, which can be parallel and non-exclusive, and judicial and non-judicial, and of public or private initiative.  Mechanisms alternative to justice for the resolution of conflicts and access to remediation, appropriately coordinated with the judicial ones in their sanctioning as well as indemnifying form.	Stakeholders
Legal Area		<b>Communication:</b> Disclose data on the operation of the systems including in the reports the number of PQRS filed, responded to and resolved on human rights issues.	Reports	The whole organization Stakeholders
Legal Area Supply		<b>Value Chain:</b> Encourage contractors and suppliers to establish PQRS systems according to internationally recognized standards.	Terms and conditions, attachments, addendums.	Contractors and Suppliers
<b>SECURITY</b>				
Sustainability/Security ESG	Maintain the security and protection of operations within an operational framework that may guarantee respect for human	Implement actions in accordance with the Voluntary Principles on Security and Human Rights that extend to contractors and suppliers in the value chain.	Terms and conditions, attachments, addendums.	Stakeholders

Sustainability/Security ESG	rights and international humanitarian law, and may act in a manner consistent with applicable international standards, in particular with respect to the use of force.	Incorporate into security assessments the perceptions and concerns of the communities in this regard, and work with members of the community to improve security or prevent or address stresses related to the operations.		Stakeholders
<b>WATER</b>				
Sustainability-Environmental	Consider the United Nations Sustainable Development Goals and the Water	Implement preventive and corrective action plans for the specific risks identified of the right to water and sanitation in the operations themselves.	Risk management plans  Environmental compliance report	Stakeholders
Sustainability-Environmental	Mandate of the CEO of the United Nations Global Compact.	Establish specific objectives for water management that may take into account the use of water by local communities and other users in the vicinity of the operations, and report on their progress.	Risk management plans  Environmental compliance report	Stakeholders
<b>DECENT WORK</b>				
Administrative Management Legal Area	Establish working conditions under principles of freedom, equity, security and dignity, protected rights, adequate remuneration and social protection.	<b>Union Recognition:</b> Design and implement specific policies and standards to meet the legal requirements in this regard, as well as mechanisms for follow-up and monitoring of their performance	Guide to working conditions	Stakeholders
		<b>Exercise of Union Activities:</b> Implement measures to guarantee respect for the freedom that all workers have, without any distinction or discrimination and in an autonomous manner, to join, not join or disaffiliate from a union organization, provided that they respect the by-laws of the same.	Guide to working conditions	
		<b>Collective bargaining:</b> Implement measures to guarantee the recognition of the right to collective bargaining of union organizations.	Collective bargaining	
Administrative Management Social Management Legal Area		<b>Job Opportunities:</b> Implement measures to generate work alternatives in the direct area of influence of the operations, whenever this is possible. The company will review that its policy and practices have an inclusive approach and a gender perspective to allow a differentiated view according to the vulnerabilities identified in the population.	Comprehensive Social Management Policy	Stakeholders
Administrative Management Legal Area		<b>Labor Conditions:</b> Implement mechanisms to disseminate to workers the labor commitments and obligations in accordance with current legislation. The company will take measures to raise	Work conditions communication	Stakeholders

		awareness about workplace harassment, sexual harassment and other gender-based violence in the workplace		
Administrative Management Legal Area		<b>Child labor:</b> Implement measures within the framework of the legislation regarding the eradication of Child Labor, allowing to identify the related risks, including the risks in the value chain.	Purchasing and contracting manual	Stakeholders
		<b>Equal opportunities:</b> Implement measures to promote the principle of non-discrimination in the framework of contracting, promotion and development processes. Likewise, to ensure that differences in remuneration of employees do not respond to distinctions, restrictions or preferences of any kind.	Guide to working conditions	
<b>ETHNIC MINORITIES</b>				
Social Management		Establish measures to include in all actions a differential approach to ensure respect for the rights of ethnic minorities. In particular, to assess and address the impacts of business activities and business relationships on the culture and territory of the identified ethnic minorities.		Stakeholders
<b>LANDS</b>				
Legal Area Social Management	The need to adopt guidelines for the purchase of land or the acquisition of rights of use within the framework of respect for the dignity and equality of the parties involved, with transparency and through means that do not contravene international standards.	Establish measures so that, in case of any new or ongoing land resettlement, legitimate holders of tenure rights may be identified, with particular attention to holders of vulnerable tenure rights.	Description of Activities of the Land Area	Stakeholders
Legal Area Social Management		Establish measures so that, in case of any new or ongoing land resettlement, financial compensation or other compensation alternatives may be planned or provided, under IFC Performance Standard No. 5 on Land Acquisition and Involuntary Resettlement.	Description of Activities of the Land Area	Stakeholders
Legal Area Social Management		Establish measures so that, in case of acquisitions, leases or other arrangements for the use of land, legitimate tenure rights may be recognized, with particular attention to holders of vulnerable rights.	Description of Activities of the Land Area	Stakeholders
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