Corporate Policy

HUMAN RIGHTS POLICY AND GUIDING PRINCIPLES OF FENOCO S.A.

It is FENOCO's commitment to comply with Colombian law and to respect human rights and fundamental freedoms of individuals.

Our approach to comprehensive management and risk control is based on the protection and care of workers, respect for the community and general interest groups.

We foster the conscious responsibility of our employees, suppliers and contractors for the respect for human rights. In the same token, we incorporate guidelines to ensure compliance with this policy in our internal risk assessment processes .

Our Management, Personnel Administration and Fenoco Code of Conduct systems require our employees to comply strictly with this policy.

We work in partnership with local governments and other stakeholders to strengthen our effective compliance with Colombian law and the principles that govern Human Rights and in particular critical issues related to discrimination, labor harassment, and physical aggression, child labor, forced or compulsory.

PRINCIPLES
The corporate principles that frame this policy are the following:

Sustainability
Responsible management of renewable and non-renewable resources, which allow us to ensure that productivity, competitiveness and profitability do not go against respect for the environment and the development of the communities surrounding our area of influence.

Respect
Operations performed under the strictest compliance with standards and procedures in an atmosphere of cordiality and solidarity with our stakeholders and the environment.

Safety

Strengthening of timely risk analysis, generating a culture of self-care and assurance of our operation and the well-being of our people and communities

OBJECT

Strengthen the management of all our processes and activities in accordance with Colombian law and the Universal Declaration of Human Rights.

To frame the operation and activities carried out by our employees and by our contractors in the respect of the rights of others and the fulfillment of fundamental principles and freedoms.

Identify, assessing the actual or potential consequences our activities may have on the human rights of communities and interest groups.

SCOPE

All railway operations and activities related to the maintenance of railways and railway machinery will include both the identification of the factors that put the rights of individuals in a vulnerable condition and the necessary protective measures to manage the potential impacts on people and the presumed affectation of their freedom and their rights, their culture, customs and customs.

For achieving this FENOCO will:

1. Systematically evaluate the results of management and compliance with this policy, defining control and improvement actions.

2. Identify, for purposes of research, analysis and improvement, the deviations from acts and omissions that endanger the integrity of workers, community and other stakeholders

3. Establish the necessary means to receive and process complaints and claims from communities and interest groups. Will also provide the remediation mechanisms that result from the corresponding investigations.

4. Promote awareness and respect for human rights, strengthening the responsible actions of our employees and contractors.

5. Communicate this policy actively to external employees and contractors and stakeholders.

The information in this policy is public. It will be reviewed and updated in accordance with the Colombian regulations and the best practices of interrelation,

respect and protection of the human rights.

In compliance with the above, the present Policy is signed, entering into effect as of November 28, 2017 and supersedes all previous provisions and will remain in force until a new policy modifies or supersedes the present.

ANDRES SOTO VELASCO
PRESIDENT