

POLICY FOR THE PREVENTION OF THE USE OF: ALCOHOL AND PSYCHOACTIVE SUBSTANCES

PRINCIPLES

The corporate principles that frame this policy are the following:

Respect

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

Integrity

Responsibility for results, acting with consistency and honesty in search of excellence.

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.

Sense of Belonging

Characterized by our commitment, diligence and opportunity in decision making and meeting objectives

PURPOSE OF THE POLICY

1. Control the risks and adverse effects the consumption of alcohol and psychoactive drugs causes in people, the alteration of their physical and mental capacities, affectation of health, safety and working environment.
2. Improve working conditions and health of workers
3. Generate the culture for the prevention of the consumption of alcohol and psychoactive substances (SPA).

OBJECTIVES OF THE POLICY

In FENOCO, there is zero tolerance level to any degree of alcohol or drugs in people, either at the time of entering the work areas or when starting any work activity. Consequently, procedures will be applied to prevent work from being performed under the effects of alcohol and SPA; or to prevent the access of persons under harmful limiting effects that endanger their own safety and integrity or of others; whether they are FENOCO workers or contractors; visitors or people of the community.

In FENOCO S.A. the prevention of drug addiction is an active process aimed at modifying and improving the quality of life of individuals; to promote individual self-control and collective resistance to the supply of drugs; and to preserve interpersonal relationships, safety and labor productivity.

- **Universal Prevention**

Implement actions aimed at the total working population, the objective of preventing consumption, highlighting the benefits of a healthy lifestyle and work. The actions include performing periodic random tests.

- **Selective Prevention**

Actions directed at specific groups of the company, to whom individual, intra and

extra-occupational risk factors have been identified.

Immediately when a work accident, incident or railway accident occurs, or in which FENOCO vehicles are involved, or leased at its service.

- **Individual Prevention**

Due to the risk nature of the railway operation, all functions and activities are classified as critical and sensitive. Therefore, FENOCO SA will promote with the corresponding EPS the necessary actions so these entities, in compliance with the Law, provide the necessary assistance and support to workers who, by their own decision and for purposes of controlling and remedying their condition, recognize symptoms of abuse or dependency.

This support must be requested in advance by the employee, without waiting for their condition and possession to be made evident during any of the monitoring activities and whose result is a positive test.

In compliance with current legal regulations, FENOCO will provide the treatment and administration of these cases as defined by Colombian law.

CONDUCT AND RECOMMENDATIONS TO BE FULFILLED BY EMPLOYEES.

The consumption, possession, distribution and sale of alcohol and SPA are absolutely prohibited in the work areas of FENOCO S.A.

Due to the harmful implications and risks derived from the consumption that these substances produce, FENOCO S.A. determines that:

- Access to the premises of the company and other areas of work to people who are under the effects of alcohol or some type of SPA is not allowed.
- Also, these people are not allowed to drive vehicles owned by FENOCO or to operate other equipment, either owned or leased to the service of FENOCO; or that are assigned within a contract in force and in execution.
- All employees, workers and contractors of FENOCO S.A. are not allowed to store and maintain alcohol and SPA within the premises of FENOCO S.A. or on board of any of the vehicles or equipment.

It is understood as an exception to the transport of substances mentioned in this policy, those special medicines formulated by a doctor; in which case, the interested person must accredit and carry the corresponding medical prescription.

This exception forces the person to know, understand and report in advance to their supervisor the possible effects of medications or agents that alter their mood. FENOCO S.A. in these cases will define the necessary controls to ensure that in no way will the reported condition adversely affect

the worker or others or cause any damage to the facility or the community.

Any of the following cases are considered a serious offense, which may lead to the termination of the Labor Contract with just cause:

- Come to work under the effects of alcohol or SPA that make the worker unfit, or risky or dangerous to their safety or that of others at work.
- Perform work in a state of drunkenness or under the influence of narcotics or SPA.
- The possession, use, distribution or sale of alcoholic beverages or SPA in the company's facilities and work areas.
- Failure to comply with obligations related to this policy.
- Refusing to be tested for alcohol or drugs. In case of refusal, this must be justified and proven. If this is not the case, the worker must be removed preventively from his duties, while his conduct is subject to a disciplinary examination.

This policy enters 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