

Environmental and Social Review Summary (ESRS) Atis Telecom Towers Equity Investment - Regional

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1. General information about the project and scope of IDB Invest's Environmental and Social Review

ATIS Group ("ATIS", the "Company", or the "Client") is an independent tower operator for Mobile Network Operators ("MNOs"), with more than one thousand sites in Argentina, Paraguay and Uruguay. The present operation (the "Project") aims to strengthen ATIS financially, enabling it to expand the capacity and coverage of the mobile broadband network through the expansion and improvement of its infrastructure, aligning with the growth plans of the MNOs.

The environmental and social due diligence ("ESDD") process included, among other aspects, interviews and meetings with Company executives, and the review of environmental and social ("E&S") and occupational health and safety ("OHS") information provided by the Client, such as: i) responses to IDB Invest's Environmental and Social Due Diligence questionnaire; ii) CV and experience of external experts and consultants advising the Company on E&S matters; iii) Protocol for Preventive, Corrective and Structural Control and Maintenance of Facilities; iv) Permits Matrix for Argentina, Uruguay and Paraguay; and v) Integrity Program and Conflict of Interest Questionnaire for Suppliers.

To ensure the Client's commitment to respect and protection of human rights, its zero tolerance for retaliation, and its commitment to provide and guarantee a safe environment for stakeholders to express their concerns without fear of any retaliation, the ESDD process also included the review of the ATIS Group Code of Conduct, Ethics and Anti-Corruption.

2. Environmental and social classification and justification

In accordance with IDB Invest's Environmental and Social Sustainability Policy, the Project has been classified as Category B because it may generate, among others, the following impacts and risks: i) increased health and safety risks for workers (work at height, electrical risk, handling of large and heavy structures, use of power tools, vehicular and machinery movements, work in confined spaces, etc.) and the community; ii) atmospheric emissions; iii) generation of solid and liquid waste (non-hazardous); and iv) use of resources. These impacts and risks are estimated to be of medium-low intensity.

The Performance Standards ("PS") activated by the Project are: i) PS1: Assessment and Management of Environmental and Social Risks and Impacts; ii) PS2: Labor and Working Conditions; iii) PS3: Resource Efficiency and Pollution Prevention; iv) PS4: Community Health and Safety.

3. Environmental and social context

3.1 General characteristics of the project site

ATIS Group is a company that provides infrastructure services to telecommunications operators, service providers and other clients, through a network of towers designed to promote the expansion and improvement of communication services. ATIS Group began its operations in Argentina in 2017, later expanding its activities to Paraguay and Uruguay. In 2025, ATIS had a total of 1012 sites (306 in Argentina, 425 in Uruguay and 281 in Paraguay), 251 of which were shared by more than one operator, bringing the total figure to 1263 contracts. Build-to-Suit ("BTS") projects are adapted to the specific needs of the MNO client and the characteristics of the chosen location. Thus, wide-coverage infrastructure is used, such as towers, monopoles and masts, or lower-height infrastructure installed on public roads, near the end user. These low-height structures are designed to integrate discreetly into the urban environment, providing telecommunications services effectively, with reduced visual impact. The shared use of telecommunications infrastructure through co-location of other clients allows for accelerated installation times, division of operational costs among the different clients installed at the site, promotion of resource efficiency and reduction of environmental and visual impacts.

3.2 Contextual risks

Argentina, Paraguay and Uruguay, like other countries in the region, face challenges in social issues with the penetration of criminal organizations associated with drug trafficking and other crimes. While the risks are moderate, there are certain sectors of the population or geographic areas where acts of violence related to rivalries or territorial disputes have increased. In an environment where state organizations dedicated to combating crime are heavily taxed by serious crimes, other minor crimes such as theft, vandalism and property damage have increased significantly, given the limitation of the forces that control and combat them. In this context, telecommunications facilities may suffer theft of cables or other elements, as well as damage to fixed installations (vandalism).

4. Environmental risks and impacts and proposed mitigation and compensation measures

4.1 Assessment and management of environmental and social risks and impacts

4.1.a Environmental and Social Management System

ATIS Group manages the environmental, social and health and safety issues of its operations by focusing on compliance with national legal and regulatory requirements in each of the countries where it operates. Each country, even each subnational division, has differences in requirements. By way of example, each location may require municipal or departmental permits, height authorization (requested from the Air Force or respective entity), environmental permit or license

(EIA or DIA), construction¹ ²permits, land use license, permit from the local telecommunications' regulatory authority, etc. ATIS Group has personnel in charge of managing permits in each of the jurisdictions where it operates.

ATIS Group will develop and implement an Environmental and Social Management System ("ESMS") composed of documented plans and procedures, whose minimum content includes the following elements: i) policy; ii) identification of risks and impacts; iii) management programs; iv) emergency preparedness and response; v) organizational capacities and competencies; vi) stakeholder engagement; vii) external communications and grievance mechanism; viii) reporting to affected persons; and ix) monitoring and evaluation. In addition, it will ensure that its ESMS is adopted and implemented by contractor and subcontractor companies in charge of the construction, installation and maintenance of the Client's telecommunications infrastructure.

4.1.b Policy

The ATIS Group Code of Conduct, Ethics and Anti-Corruption contains much of the elements required by a management policy. However, ATIS will develop and adopt an Environmental, Social and Safety and Hygiene Management Policy that: i) ratifies the Project's commitment to comply with applicable legal requirements; ii) aims to protect the health and safety of workers and compliance with employment legislation, and care for the environment; iii) seeks the well-being of the immediate community (neighbors, clients, contractors, suppliers and other stakeholders); and iv) aligns with international best practices. The Policy must be communicated to all levels of its organization, including major contractors and suppliers, as well as the general public.

4.1.c Identification of risks and impacts

As part of the ESMS to be developed, ATIS will generate a risk and impact matrix, which takes into consideration the area of influence of each site, and which maps the processes, physical facilities, equipment, and internal and external elements that may generate such risks and impacts. This identification will allow prioritization of the management programs to be developed based on their probability of occurrence and the severity of their effects.

4.1.c.i Direct and indirect impacts and risks

The environmental and social risks and impacts associated with the Project during the construction phase include: i) labor risks and occupational health and safety related to construction work (work at height, use of lifting and construction machinery, entry into confined spaces, ergonomic risk, electrical risk, risks associated with the handling of optical fiber, among others); ii) impact on road safety and traffic flow due to transportation of materials and large elements (towers, poles, masts or structures); iii) generation of solid and liquid waste (domestic, industrial, hazardous and non-hazardous); iv) emissions of gases and dust to the atmosphere (use of vehicles, machinery and electric generators); and v) noise (electric generators, refrigeration and air conditioning equipment). During its operational phase there will be: i) an improvement in connectivity for neighbors; ii) risks

¹ Environmental Impact Assessment

² Environmental Impact Statement

associated with maintenance (electrical risks, work at height, entry into confined spaces, use and handling of pesticides, among others).

4.1.c.ii Analysis of alternatives

The alternatives analysis is carried out at the selection stage of each site, when the client indicates to ATIS where it requires the construction of the tower based on the coverage needs of the mobile network. Thus, a search ring is determined, with a specific radius within which an attempt must be made to find a site for the construction of the tower. Based on the regulations of the municipality or department, and commercial, as well as environmental and social considerations, the search for possible locations begins, selecting 3 suitable options to offer to the client, who makes the final decision.

4.1.c.iii Cumulative impacts

The incremental impact that other past, ongoing and reasonably foreseeable projects to be built in the future in the area of influence of the Project are considered non-material, which is why a cumulative impact mitigation plan is not required.

4.1.c.iv Gender risks

Some of the main gender risks widespread in most Latin American countries include: gender-based violence; discrimination in the workplace; sexual harassment; physical violence and verbal abuse; unequal treatment in compensation and promotion opportunities; differentiated wages; and difficulties in accessing credit and training opportunities. The gender gap indices for 2025 of the countries involved in the Project (Argentina, Uruguay, and Paraguay) place them in positions 7, 17 and 20 respectively, among the 21 Latin American countries analyzed, although the dispersion in the index is relatively low (0.76, 0.72 and ³0.70 respectively).

ATIS is a relatively small company in terms of personnel, with a total number of employees in the range of 30 people, of which more than a third are women. However, the risk may increase among its main contractors, particularly in the construction sector, where there is a predominance of male labor that occupies around 90% of the construction personnel. As for structure suppliers, the proportion of women in the industrial workforce is barely higher than in construction.

The ATIS Group Code of Conduct, Ethics and Anti-Corruption contain specific clauses against harassment or offensive conduct, both internally and for those who carry out activities for the company. There are internal mechanisms to report such conduct, including anonymously.

4.1.c.v Gender programs

ATIS female personnel currently represent 38% of the total, a figure slightly higher than the average for Argentina. ATIS will work to increase the participation of women, particularly in its senior management group.

³ <https://www.statista.com/statistics/803494/latin-america-gender-gap-index-country/>

4.1.c.vi Exposure to climate change

The possible effects of climate change foresee an increase in the frequency and intensity of extreme weather situations (greater and more intense precipitation, strong wind events, sustained increase in the frequency and duration of heat waves). Structure suppliers use standards approved by each country for their calculation and construction, which take these natural phenomena into account. Contractors will include provisions in their management systems to prevent associated risks, as well as have emergency response procedures.

4.1.d Management programs

ATIS will establish plans, programs and procedures to manage the environmental, social and health and safety risks and impacts identified in the risk matrix. These programs will contain, among others, the following elements: i) purpose of the procedure, specifying the target risk; ii) scope, specifying which location, components or persons it applies to; iii) definitions, whenever necessary to avoid doubts; iv) responsibilities, determining who is responsible for planning, execution, supervision and control, etc.; v) references, applicable standards, manuals and associated documentation; vi) resources, materials and supplies, tools and equipment, human resources; vii) management methodology, work instructions; viii) training requirements; ix) key indicators, records; x) approval authority, version and date; and xi) annexes (formats, application records, etc.).

4.1.e Organizational capacities and competence

Occupational health and safety issues, as well as environmental issues are the responsibility of the Operations and Maintenance Department, led by the Director of Operations. The Department has a procurement area, an engineering area, a construction area and a maintenance area. Based on the client's needs, the location of the tower is decided, the type of structure to be used is defined, the site lease is negotiated and permits are obtained. The construction area is in charge of contracting the work and its supervision.

ATIS has external advisors for the identification, evaluation and management of environmental and health and safety risks. An expert in telecommunications and electromagnetic emissions advises ATIS on issues related to the health and environmental impacts of non-ionizing radiation and electromagnetic fields. In turn, an expert in occupational hygiene and safety issues collaborates on specific occupational health and safety issues during the construction and maintenance stages.

Social aspects are handled by the Operations Department together with the municipalities when managing permits. When a location is selected, in the process of obtaining permits there is contact between the municipality and members of the community where concerns or requests for modification may arise. There are few cases in which the community does not agree with the location of a tower, since it is generally perceived as an improvement in connectivity.

4.1.f Emergency preparedness and response

As part of the ESMS, ATIS will prepare and implement an Emergency Prevention and Response Plan ("EPRP") for the construction stage and the maintenance of the sites. This plan will define the minimum content that must be incorporated into the specific emergency plans to be prepared by contracting and subcontracting companies, and will identify: i) specific emergency scenarios according to what is identified in the risk matrix, including those associated with adverse weather conditions (strong winds and electrical storms); ii) the actions to be executed to prevent and to face the emergency; iii) the chain of command that will act during the emergency; iv) the data of external actors potentially involved during an emergency (ambulance, medical assistance centers, firefighters, police, municipalities and other civil authorities, etc.); v) the communications flowchart and the authority for decision-making; vi) meeting points, emergency exits and the location of specific facilities (such as fire extinguishing equipment, flammable material storage, power cut-off switches, rescue and primary care equipment, among others); and vii) the methodology and assignment of responsibilities for the reporting and investigation of accidents and incidents, which allows identifying preventive or corrective measures to avoid their future occurrence.

4.1.g Monitoring and evaluation

ATIS will develop and implement an Environmental, Social and Safety and Hygiene Monitoring Plan, to monitor, among other aspects, the following: i) frequency and severity rates of accidents for its own personnel and contractors; ii) records of incidents and unsafe working conditions; iii) other parameters that require monitoring as specified in the Study and Safety and Hygiene Plan of the work; iv) number of community complaints received and resolved or pending resolution; v) a detail of water, electricity and fuel consumption; vi) a detail of the quantity and volume of hazardous and non-hazardous waste generated and their forms of treatment; and vii) a detail of the training courses provided and attendance records.

4.1.h Stakeholder participation

The main social actors are the members of the communities where ATIS Group places telecommunications antennas. These communities, in general, act through municipal authorities, whose support is fundamental for interaction, facilitating exchange spaces, providing agility in approval processes, and providing regulatory accompaniment.

The identification of sites, whether to rent or buy, is carried out by ATIS managers who perform an analysis of the neighborhood situation in terms of security and potential conflict situations with neighbors. The latter have access to municipal or departmental offices, and it is these that convey possible concerns and demand the corresponding response.

4.1.h.i Disclosure of information

Many of the Project sites have signs that have been placed at the entrances with the company name and a telephone number dedicated especially for any emergency, inquiry or need that whoever is

at the site may have. Additionally, the official ATIS website⁴ provides information about the Company, including its Code of Conduct, Ethics and Anti-Corruption, and offers the possibility of making an inquiry, complaint or claim by filling out a form completely anonymously for the peace of mind of whoever does so.

4.1.h.ii Informed consultation and participation

Although current legislation does not require the establishment of a citizen participation mechanism, ATIS will identify key social actors before the start of the work to learn their perception and capture their concerns regarding the Project.

4.1.h.iii Indigenous people

The project will not affect indigenous people.

4.1.h.iv Private sector responsibilities within the framework of a stakeholder engagement process led by the government.

The responsibility for the stakeholder engagement process is assumed solely by the Project. No consultation with stakeholders by the government is foreseen or has been conducted.

4.1.i External communications and grievance mechanism

4.1.i.i External communications

Communications with the community near the sites where ATIS operates are conducted through municipal agencies. Notwithstanding this, ATIS has its website through which it can disseminate information to the general public.

4.1.i.ii Grievance mechanism for affected communities

In addition to the possibility of filing a complaint or claim through the Company's website, ATIS also offers an email address to anonymously write any inquiry, claim, or need that one wishes to report. This claim reaches an external hotline administrator (NAVEX/EthicsPoint) who notifies the Company's legal department of the claim or complaint received and carries out follow-up on the management and resolution of the case.

The legal department is conducting a preliminary review to confirm the nature of the complaint and determine whether an internal investigation is required. Matters involving potential legal, financial, or ethical risk are escalated to the Chief Executive Officer ("CEO"), Chief Financial Officer ("CFO"), and Chief Technology Officer ("CTO") and, where appropriate, to the Board of Directors. The Chief Executive Officer and Legal Director jointly make disciplinary decisions for proven misconduct. The Legal Department documents and retains all steps, findings, and actions taken.

⁴ <https://atis-group.com/>

4.1.i.iii Provisions to address complaints from vulnerable groups

ATIS has not identified communities or vulnerable groups among those potentially affected by its activities.

4.1.i.iv Reports on affected communities

In the event of complaints or claims, ATIS and the involved contractor companies will prepare and submit reports to respond to any requirements that relevant stakeholders may have. ATIS will internally determine which persons will be designated to make such communications on behalf of the institution.

4.2 Labor and working conditions

4.2.a Working conditions and management of labor relations

4.2.a.i Human resources policies and procedures

The ATIS Group Code of Conduct, Ethics and Anti-Corruption establish guidelines for ethically acceptable conduct for directors, executive officers, and employees. The provisions of this Code also apply to all suppliers and service providers, shareholders, customers, and other third parties that have any type of relationship with the Company. ATIS is committed to complying with employment and labor laws and regulations applicable in each place where it operates, which includes rules on wages, hours, privacy, immigration, non-use of forced and child labor, collective bargaining, anti-discrimination, and similar rules on employment.

The Code explains the responsibilities of employees and the obligation to report any possible non-compliance and cooperate in any investigation that may be conducted subsequently. Suppliers and service providers must sign a letter of commitment to comply with the principles and obligations provided therein.

4.2.a.ii Working conditions and terms of employment

The ATIS Code of Conduct, Ethics and Anti-Corruption, to which every contractor and subcontractor must adhere, establishes the need to comply with legislation on safety, health, and working conditions of each country within the full scope of the Project.

4.2.a.iii Labor organizations

In accordance with the legislation of each of the countries where ATIS operates, its workers have no restriction whatsoever to form unions or join them and negotiate collective contracts. However, at present, ATIS employees are not affiliated with any labor organization.

4.2.a.iv Non-discrimination and equal opportunities

ATIS develops a culture of respect for diversity in the workplace through hiring, retention, promotion, and other employment-related activities, ensuring, in addition, hiring based on the qualifications necessary for the position, and not on race, age, sex (including pregnancy), national origin, ethnicity, color, sexual expression or orientation, religion, or other characteristics that the worker may have. This principle is reflected in its Code of Conduct, Ethics and Anti-Corruption.

4.2.a.v Workforce reduction

No reductions in the workforce are foreseen. Construction processes are relatively brief and with personnel that companies hire regularly.

4.2.a.vi Grievance mechanism

Workers, whether own or contractors', can access the same grievance and complaint mechanisms existing for the general public through the Company's website. Internally, there is an email box(etica@atis-group.com) for sending inquiries, complaints, or anonymous complaints that are received by the legal department and the CEO of the company.

4.2.b Protection of the workforce

4.2.b.i Child labor

ATIS Group does not hire minors and also ensures that contractor companies comply with the corresponding national legislation, which sets 18 years as the minimum age to work. According to the legislation of each country, minors are allowed to perform non-hazardous tasks and comply with the requirements of each of the legislations that establish, among other things, the minimum age to work, authorizations from parents or guardians, and permits processed before the corresponding public agencies.

4.2.b.ii Forced labor

ATIS Group does not employ and will not employ forced or unpaid labor.

4.2.c Occupational health and safety

The protection of occupational health and safety, including external collaborators, is explicit in the Company's Code of Conduct, Ethics and Anti-Corruption. However, to be able to guarantee the above, ATIS will develop and implement the Management Programs that are necessary according to the identification made in the risk matrix. Notwithstanding the above, the safety plan for each job must comply with the regulations of the country where it is carried out.

4.2.d Provisions for people with disabilities

The ATIS Code of Conduct, Ethics and Anti-Corruption establishes its commitment to guarantee equal opportunities for its personnel and to execute actions aimed at promoting the full exercise of the rights of people with disabilities. Given that, to date, ATIS does not have employees with physical or mental limitations, nor facilities suitable for the mobilization of persons with disabilities, it will work on a strategy for the inclusion of employees with disabilities and will consider the incorporation of universal design principles, in the design, construction, and operation (including emergency and evacuation plans) whether it be new construction or restructuring, expansion, or modernization of facilities, to maximize use by all potential users, including persons with disabilities, in its facilities.

4.2.e Workers hired by third parties

According to the ATIS Code of Conduct, Ethics and Anti-Corruption, subcontractors must comply with the same requirements as contractors, whether they are companies or self-employed workers. These requirements include contracting personal accident insurance policies and executing safety programs prepared by Hygiene and Safety professionals that include risk assessment, accident prevention measures, necessary hygiene and safety controls, and required training. ATIS extends its grievance mechanism to workers hired by third parties.

4.2.f Supply chain

ATIS, together with its suppliers, develops solutions based on the needs of its customers, seeking the adoption of emerging technologies. Thus, it has an experienced group of structure suppliers, mainly in the local Argentine market, who source local inputs and labor.

Suppliers of construction materials and inputs, as well as components for structures that will be manufactured in workshops, present low risk of child or forced labor, since they are mostly industrial suppliers accredited in the market.

4.3 Resource use efficiency and pollution prevention

4.3.a Resource use efficiency

4.3.a.i Greenhouse gases

Scope 1 GHG ⁵emissions (direct emissions) consist mainly of emissions from vehicles used by ATIS personnel in their tasks. Scope 2 emissions (indirect emissions from energy) correspond mainly to the electrical supply of the towers, which comes from the electrical grid, generally provided by the operator. Both emissions are considered non-material.

⁵ Greenhouse Gases

4.3.a.ii Water consumption

Water consumption occurs during the civil construction phase and, to a lesser extent, during maintenance tasks. In case there is no supply availability on the premises, water is provided by the contractor in a cistern tank from a local supplier, although normally they are reduced quantities. The amount of water required for the project is non-material.

4.3.b Pollution prevention

4.3.b.i Waste

Non-hazardous waste generated during construction or maintenance stages is managed by contractors, following local regulations. For this they are required to obtain the corresponding discharge authorizations.

4.3.b.ii Hazardous materials management

Hazardous waste generated during construction will be managed by contractors through authorized companies, which will comply with current legislation and document the transport, treatment, and final disposal.

4.3.b.iii Pesticide handling and use

Pesticide handling is carried out by technicians from companies that provide maintenance services, when the existence of any damage to the facilities is detected. ATIS will verify that products containing components in categories 1a or 1b according to the World Health Organization ("WHO") toxicological classification ⁶are not used. If they exist, immediate replacement of such products will be requested.

4.4 Community health and safety

4.4.a Community health and safety

4.4.a.i Infrastructure and equipment design and safety

The structures used by ATIS are designed and calculated under the National Structural Safety Regulations issued by CIRSOC ⁷belonging to INTI of Argentina. ⁸These regulations are a national reference in construction in that country, minimizing risks to surrounding communities.

Before construction, ATIS manages a construction permit, for which it must submit: a construction plan, an electromechanical plan, a soil study, an engineering study, and a calculation report. Once the work is completed, there are jurisdictions that only require notification of completion of works,

⁶ <https://www.who.int/es/publications/i/item/9789240005662>

⁷ Research Center for National Safety Regulations for Civil Works

⁸ National Institute of Industrial Technology

while others (such as most municipalities in Argentina) require submission of a final construction plan and processing of a Final Construction Certificate or Site Authorization to authorize its operation. The procedures are similar in Paraguay and Uruguay.

Currently, ATIS is working on the installation of structures that enable the placement of equipment inside them, considerably reducing the space needed for construction and operation of the site, as well as its visual impact.

4.4.a.ii Hazardous materials management and safety

The procedures that will be included in the ESMS will establish how hazardous materials used by contractors during construction and maintenance will be managed.

4.4.a.iii Ecosystem services

The Project will not materially impact any ecosystem services.

4.4.a.iv Community exposure to diseases

Except during maintenance tasks (which require few people working a couple of hours), the tower facilities are closed and devoid of personnel, so the risk of exposure to diseases is considered practically nil.

Regarding non-ionizing radiation emitted by antenna operators, international health organizations, such as WHO and ICNIRP, conclude ⁹that there is no solid evidence of health risks from telephone antennas that comply with standards, as they emit low-energy non-ionizing radiation.

4.4.a.v emergency preparedness and response

As part of the development of the EPRP, ATIS will invite municipalities and other civil authorities to participate in integrating the nearby community into emergency response processes.

4.4.b security personnel

ATIS does not use security personnel.

4.5 Land acquisition and involuntary resettlement

The sites where ATIS will install the antennas are leased or purchased from owners in market transactions. There are also facilities on publicly owned sites under municipal or departmental concessions. The Project will not generate involuntary physical displacement of people or economic activities.

⁹ International Commission on Non-Ionizing Radiation Protection

4.6 Biodiversity conservation and sustainable management of living natural resources

No impacts on biodiversity or living natural resources are expected. The sites have a very small footprint, approximately 100 square meters. This facilitates the choice of location alternatives for tower construction respecting established zoning limitations, as well as biodiversity protection and conservation requirements, without affecting ecosystem services. These limitations are determined when permits are processed with the corresponding authorities.

However, if it is unavoidable to locate the tower in a protected area or sensitive habitat, ATIS will conduct an ESIA and will seek to minimize impacts by using pre-existing access corridors and will develop specific impact mitigation procedures during construction and maintenance (avoid breeding or nesting seasons of native species, avoid introducing invasive flora, seek to minimize the footprint, among others).

In order to minimize possible bird collisions with towers, ATIS will limit their height, avoid locating them on migratory bird routes or nesting or foraging sites, choose tower designs that help minimize collisions (for example avoid towers that require flight deterrents), reduce or eliminate lighting that attracts flying insects that encourage the presence of birds (strobe lights for aerial marking), and install underground electrical wiring, among other measures.

4.7 Indigenous people

In general, the sites for locating telecommunication structures are in urban or suburban areas, or in rural areas outside indigenous communities, so no impacts on such communities are expected.

For cases where one of the towers has to be located within these territories and this fact generates negative impacts on the indigenous population, ATIS will analyze the advisability of changing the proposed location and, if not feasible, will ensure a process of prior, free and informed consent of the affected community.

4.8 Cultural heritage

No impact on tangible or intangible cultural heritage is anticipated. In any case, ATIS will develop and adopt a procedure in case of chance findings, consistent with what is required by relevant legislation.

5. Local access to project documentation

Documentation related to the project can be accessed at the following link:

<https://atis-group.com>