

## Railway Corridor La Dorada – Chiriguaná - COLOMBIA Environmental and Social Review Summary (ESRS)

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

The La Dorada-Chiriguaná railway corridor (the "Project") is the first railway public-private partnership ("PPP") led by the National Infrastructure Agency ("ANI") of Colombia, which was born as a government proposal to reactivate the country's freight rail transport, promoting intermodality and logistical efficiency.

For practical purposes, the execution of the Project has been divided into three Functional Units ("FU"): (i) FU1, segmented into 53 sections or Railway Functional Units ("RFU"), which includes the rehabilitation, improvement and maintenance of 526 km of railway infrastructure between La Dorada (Department of Caldas) and Chiriguaná (Department of Cesar) with their respective branches; (ii) FU2, which provides for the construction and operation of administrative and operational infrastructure complementary to the corridor (administrative buildings, control center, heavy and light workshop, communication system, signaling and control); and (iii) FU3, which includes the construction and operation of associated logistics infrastructure (logistics services and cargo transfer centers).

The Project, after completing the corresponding competitive process, was awarded to the Estructura Plural Línea Férrea Consortium (the "Concessionaire", the "Client" or the "Company"), formed by Ortiz Construcciones y Proyectos S.A. (75% participation), Transporte Ferroportuario de Colombia – Transferport S.A.S (15%), and C.I. y Colombian Natural Resources S.A.S. (10%). The concession term of the Project, of 120 months (10 years), comprises the following phases: (i) pre-construction stage, with a duration of 15 months, which includes, among other activities, (a) the development of technical studies and final designs, (b) the signing of the engineering, procurement and construction contractor ("EPC") contract, (c) the financial closing of the operation that will finance it, and (d) the operation of the current corridor; (ii) construction stage, with a duration of 49 months, which basically includes (a) the delivery of the 53 RFUs that make up FU1 and (b) the construction and delivery of FU2 and FU3; (iii) operation and maintenance ("O&M") stage, with 50 months duration, which includes (a) the signing of the O&M stage start certificate, (b) the availability of FU1, FU2 and FU3 and (c) the operation and maintenance of the corridor and the operation, administration and logistics buildings, among other activities; and (iv) reversion stage, of 6 months duration, which includes (a) the signing of the reversion stage start certificate, (b) the analysis of final verifications of Project compliance and (c) the review, by ANI, of the concession assets.

Once executed, the Project is expected to improve road and pedestrian safety by discouraging the use of unsafe means of transport; boost the economy and strengthen existing production chains; improve access to public programs and reinforce institutional management in the territory;

motivate municipalities to review and update their territorial planning instruments, in line with national development goals; and reduce CO<sub>2</sub> emissions, by replacing truck trips with rail transport.

The Project has three instruments for environmental management: i) an Environmental Management Plan ("EMP"), approved through resolution 751 of 2002; ii) an Environmental License for the Puerto Nare Variant, approved through Resolutions 2098 of 2005 and 2167 of 2025; and iii) an Adaptation Plan to the Environmental Guide ("APEG"), in accordance with the Environmental Management Guide of the Railway Subsector. Also, and in accordance with the Concession Contract, it is preparing an Environmental Impact Assessment ("EIA") for the construction of the vehicular and pedestrian bridge "Puente Sogamoso", which it will submit to the Regional Autonomous Corporation of Santander ("CAS") for approval.

The environmental and social due diligence ("ESDD") process included, among other aspects: a visit to the Project site in the month of March 2026; interviews and meetings with the technical, environmental, social, occupational health and safety and land teams of the Concessionaire, the Construction Consortium (Ferrocentral and CAXAR), as well as with workers linked to these companies; and the review of environmental, social ("E&S") and occupational health and safety ("OHS") information provided by the Concessionaire, such as: i) the APEG for operation and maintenance of the La Dorada - Chiriguaná railway corridor, ii) the EMP, iii) the Contractual Social Management Plan ("CSMP"), iv) the Monitoring and Follow-up Plan, v) the Contingency and Emergency Plan, vi) the Involuntary resettlement strategy for housing and buildings present in the operational strip of the railway corridor; and vii) the Sustainable Contribution, Adaptation and Mitigation Program for climate change for the pre-construction phase.

To ensure the Project's commitment to respect and protection of human rights, its zero tolerance for reprisals, and its commitment to provide and guarantee a safe environment for stakeholders to express their concerns without fear of retaliation, the ESDD process also included the review of the following documents: i) Coexistence Manual, ii) Internal Work Regulations, iii) Contractors Manual on Occupational Health and Safety and iv) Safe firearms handling procedure of the subcontractor CAXAR.

## **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 A because it may generate, among others, the following impacts and risks: (i) increase in the emission of dust, gases, noise and vibrations from the passage of rolling stock and from the increase in the frequency in the number of trips; (ii) generation of domestic and industrial waste; (iii) possible soil contamination from spills of hazardous materials such as oils, fuels and paints; (iv) generation of construction waste (excavation material, debris, wooden sleepers, concrete sleepers, metal rails, surplus ballast and sub-ballast); (v) impact on water resources from increased suspended solids associated with erosion processes; (vi) resettlement of social and productive units that informally occupy the operational strip of the railway corridor; (vii) increase in traffic accidents with communities; and (viii) possible impact on cultural heritage. These impacts and risks are estimated to be of medium-high 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; v) PS5: Land acquisition and involuntary resettlement and vi) PS8: Cultural heritage.

### **3. Environmental and social context**

#### **3.1 General characteristics of the project site**

The Project, with an approximate length of 526 km, crosses 25 municipalities <sup>1</sup>located in the departments of Caldas, Antioquia, Santander, Norte de Santander and Cesar. This territory, which presents a wide administrative and community diversity, is located in the so-called middle Magdalena valley basin ("MMV"), which extends between the Central Cordillera ("CCC") and the Eastern Cordillera of Colombia ("ECC"). The route runs over flat terrain and dissected hills at an altitude of between 200 and 1,000 meters above sea level. The region records an average annual temperature of between 27.5 and 29.4 °C. The territory is characterized by alluvial plains, river terraces and wetland areas corresponding to the Magdalena River valley, which is dominated by alluvial and residual soils, with agricultural and livestock vocation and presence of areas susceptible to erosion and sedimentation processes.

The vegetation cover is mainly composed of artificial pastures, low and high scrub, shrubs and very fragmented relicts of tree vegetation, with the presence of patches of gallery forests along rivers and streams. Areas of environmental importance include the wetlands and swamp complexes of the Magdalena Medio, water buffer zones of rivers and swamps, and areas under protection figures, including the Protective Forest Reserve of the Upper Basin of Caño Alonso and various integrated management districts recognized in the municipalities of the corridor.

There are rural and urban communities distributed along the corridor, with a high proportion of rural population in several of the municipalities. The local economy is mainly sustained by extensive livestock farming, agriculture (palm, corn, rice, cassava, fruit trees), artisanal fishing, local commerce and logistics activities linked to transport and railway operation. Although in the broader region there are indigenous and Afro-descendant populations, within the operational strip of the corridor no ethnic communities settled are identified. Population dynamics reflect diverse conditions in terms of access to services, basic infrastructure and rural economic activities.

The populated centers present in the corridor's surroundings are characterized by small and medium-scale configurations; most have a linear urban pattern, associated with main roads and access to basic services. In intermediate and rural sectors, dispersed settlements and hamlets predominate, associated with agricultural activities and with low availability of infrastructure. In municipalities with railway tradition, there are urban facilities historically linked to the corridor, such as yards, warehouses, and industrial zones consolidated around former railway operations.

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<sup>1</sup> La Dorada, Sonsón, Puerto Triunfo, Puerto Nare, Puerto Berrío, Cimitarra, Puerto Parra, Simacota, Barrancabermeja, Puerto Wilches, Sabana de Torres, Rionegro, La Esperanza, San Alberto, San Martín, Río de Oro, Aguachica, Gamarra, La Gloria, Pelaya, Pailitas, Tamalameque, Curumani, Chimichagua, and Chiriguaná.

### **3.2 Contextual risks**

Historically, the territory where the Project is located was of great importance for guerrilla groups, drug traffickers, and paramilitary groups because it provided ease of transport: i) fluvial, via the Magdalena River, ii) air, in Barrancabermeja and clandestine airstrips; and iii) land, via the then-called Pan-American Highway. Although, at present, some guerrilla and paramilitary groups have disarmed and signed agreements with the national government, violence continues to occur, generating pressure and fear on the communities.

The development of the Project in five Departments and 25 municipalities (many of them with populations in vulnerable situations) <sup>2</sup>also implies challenges of coordination and inter-institutional articulation.

Having said the above, the main contextual risks for the Project are manifested in the following five (5) components, with a high or moderate risk level: i) security and conflict, ii) political risk, iii) conflicts over land use and iv) reprisals

## **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

The Concessionaire has an Integrated Management System ("IMS") that contains policies, procedures, instruments, and resources for environmental, social, and occupational health and safety management of the Project. The IMS Manual, currently under preparation, will also describe the Environmental and Social Management System ("ESMS"), which will consolidate: i) policies; ii) procedures for risk and impact identification; iii) management programs; iv) description of organizational capacity and required competencies; v) emergency preparedness and response protocol; vi) stakeholder engagement plan; vii) protocols for external communication and grievance mechanisms; viii) requirements for continuous information to affected communities; and ix) monitoring and review procedures.

#### 4.1.b Policy

The Concessionaire has adopted the following policies: i) of the IMS; ii) of Occupational Health and Safety, iii) of Alcoholism and Psychoactive Substances, iv) of Road Safety, v) of Human Rights, vi) of Human Resources; and vii) of Gender Equity, Diversity, and Labor Inclusion. Currently the Concessionaire is preparing its Sustainability Policy.

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<sup>2</sup> Households in multidimensional poverty, female heads of household, dispersed rural communities, older adults, and internal migrants

#### 4.1.c Identification of risks and impacts

The environmental and social risks and impacts of the Project have been identified in the following instruments: i) the PAGA of the La Dorada – Chiriguaná Railway Corridor; ii) the Environmental Procedures, Operation and Maintenance Activities Plan (PL-CLFC-002); iii) the Environmental Management Plan, Rehabilitation, Reconstruction and Conservation of the Atlantic Railway Network (PL-CLFC-004); iv) the EMP for the construction of the railway bypass in Puerto Nare, Antioquia (PL-CLFC-005); v) the Social Management Plan; and vi) the Environmental Impact Assessment of the Vehicular and Pedestrian Bridge project over the Sogamoso River (under preparation).

The occupational health and safety risks of workers are identified in the hazard identification, risk assessment and control matrix for both operational and project areas (code F-SG-010), as well as for administrative, financial, accounting, procurement, human resources and purchasing areas (code F15-01). The risks derived from exposure to threats of natural, social or unintentional anthropogenic origin are identified in the Prevention, Preparedness and Response Plan for emergencies and contingencies (LFC-PL-AMB-003).

##### 4.1.c.i Direct and indirect impacts and risks

The most relevant direct impacts of the Project are associated with the clearance of the railway right-of-way ("ROW") of the existing corridor, an action that, although not required for the rehabilitation of the railway line, must be executed by the Concessionaire by virtue of the contract signed with the ANI. The other environmental, social, and health and safety impacts are considered of medium intensity and will be managed through the implementation of the PAGA, the PGSC and the Involuntary Resettlement Plan.

##### 4.1.c.ii Analysis of alternatives

The Project contemplates the rehabilitation and improvement of the existing railway corridor, limited to the intervention of the current footprint. Consequently, no location alternative analyses were developed; however, given the occupation of the safety strip of the railway line.

Regarding the "Sogamoso Bridge" project, the analysis of alternatives, prepared by the ANI, is being reevaluated by the Client to prevent the generation of environmental and social impacts and risks.

##### 4.1.c.iii Cumulative impacts

The Concessionaire is developing a cumulative impact assessment of the "Sogamoso Bridge" project as part of the scope of the EIA; this section evaluates the projects under execution within the area of influence and the interaction with the railway corridor.

##### 4.1.c.iv Gender risks

The presence of Project workers in rural areas and in communities with limited access to institutional services may increase the exposure of women, girls and adolescents to risks of gender-based violence ("GBV"), particularly sexual harassment, sexual exploitation, domestic violence and

situations associated with prior gender inequalities. These risks are reinforced by regional patterns such as the increase in femicides and sexual crimes (Antioquia), the sustained increase in notification <sup>3</sup>rates of gender and domestic violence between 2020 and 2025 (Santander and Norte de Santander) and persistence of physical, sexual and <sup>4</sup>psychological violence, associated with structural gender inequalities and sociocultural conditions that increase the vulnerability of women and girls (Caldas, Antioquia, Santander, Norte de Santander and Cesar).<sup>5</sup>

The Project's PGSC incorporates specific measures for the management of GBV risks. The Community Strengthening Program includes (a) a protocol for the prevention and care of GBV cases, (b) periodic awareness campaigns on the topics of violence, gender equality, new masculinities and prevention of sexual exploitation and abuse. The Training, Education and Awareness Program for the Surrounding Community incorporates training content on gender equality awareness and women's rights, GBV prevention and child abuse prevention. The Education and Training Program for Personnel linked to the Project establishes mandatory training on gender approach and GBV prevention, as well as internal action protocols. The User Service Program integrates: i) indirect GBV management measures that use accessible and safe grievance channels for women, girls and vulnerable persons; and ii) contains differentiated guidelines for serving persons in special conditions, as well as procedures to register and manage, in a confidential manner, communications related to violence or harassment.

#### 4.1.c.v Gender programs

The Project has not yet identified gender risks in a specific manner. In this regard, the Concessionaire will prepare a Gender Risk Management Plan ("GRMP") that will include: i) measures to manage the Project's specific gender risks; ii) a Code of Conduct for Workers, also applicable to contractors, that will prohibit discrimination, violence and harassment on the basis of gender; iii) training requirements for Project workers (including contractors) on the plan; and iv) measures to maximize the Project's benefits (including as workers and suppliers) for women.

#### 4.1.c.vi Exposure to climate change

The region where the Railway Corridor is located may present the following climate risks: i) climate variability, which includes extreme events that can affect terrain stability and water availability and that are associated with (a) precipitation and floods associated with La Niña and other variability patterns, and (b) prolonged droughts during warm phases of ENSO (El Niño); and ii) climate change, which includes (a) the increase in future average temperatures, (b) the intensification of heat waves, (c) increasing rainfall variability, and (d) changes in hydrological patterns, erosion, thermal stress.

The Concessionaire will prepare a Disaster Risk Management Plan, which will incorporate measures for the reduction of risks associated with climate change.

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<sup>3</sup> <https://www.defensoria.gov.co/-/panorama-de-las-violencias-de-genero-en-colombia-enero-a-mayo-de-2025>

<sup>4</sup> [https://www.ins.gov.co/buscador-eventos/BoletinEpidemiologico/2025\\_Boletin\\_epidemiologico\\_semana\\_47.pdf](https://www.ins.gov.co/buscador-eventos/BoletinEpidemiologico/2025_Boletin_epidemiologico_semana_47.pdf)

<sup>5</sup> <https://www.sispro.gov.co/observatorios/onviolenciasgenero/Paginas/home.aspx>

#### 4.1.d Management programs

The Project's E&S management programs are included in the ESMP, the CSMP, the Occupational Health and Safety Management System (OH&S MS) programs, and in the ESIA of the Sogamoso Bridge project. These include, among others, programs for: i) environmental management and control, ii) management of (a) quarries, (b) solid waste, (c) liquid waste, (d) water and (e) soil; iii) sediment control, slope and embankment stability, iv) removal of minor landslides, v) revegetation of unstable areas; vi) conservation of wilderness areas; vii) afforestation, viii) biodiversity conservation; ix) community information and participation; x) social management; xi) personnel selection and hiring; xii) support for institutional management capacity; xiii) education and awareness of the surrounding community; xiv) preventive archaeology; xv) support for socio-land management; and xvi) ....???

The Concessionaire has an Occupational Health and Safety Management System (OHSMS), which includes a Contractors' Manual on Occupational Health and Safety; an Annual Occupational Health and Safety Work Plan; an Annual OH&S Training Program; and the following procedures: i) order and cleanliness in the workplace, ii) scheduled inspections, iii) prevention and protection against falls from heights, iv) investigation of work accidents and occupational diseases,

The ESIA of the Sogamoso Bridge project will contain a specific Environmental Management Plan.

#### 4.1.e Organizational capacity and competence

The Concessionaire's organizational structure is composed of: i) an Occupational Health and Safety Coordinator, who reports to the Administrative Directorate; ii) a Social Director, supported by a team composed of 3 social professionals in the field; iii) an Environmental Director, who has a team made up of an environmental resident, a biotic resident, a forestry resident and a sustainability professional; and iv) a Land Director, supported by a team made up of a technical land coordinator, a socio-land coordinator and a legal-land coordinator.

The Concessionaire: i) will ensure that the organizational structure and resources allocated to the implementation of the Project's environmental and social management remain adequate and are strengthened for the construction phase, in the areas of Occupational Health and Safety and Social; and ii) will define roles, responsibilities and authority to implement and monitor the environmental and social performance of contractors and subcontractors.

#### 4.1.f Emergency preparedness and response

The Emergency and Contingency Prevention, Preparedness and Response Plan, prepared and adopted by the Concessionaire in October 2025, contains a strategy for the use of available resources and assigns roles and responsibilities to ensure maximum response capacity within the contractual framework governing the Project.

#### 4.1.g Monitoring and evaluation

The CSLE <sup>6</sup>Consortium exercises supervision of the Project in support of the contracting entity, the National Infrastructure Agency ANI, which implies monitoring of contractual, technical, environmental, social, land and occupational health and safety aspects. As part of the IMS, the Concessionaire has an internal audit procedure whose scope covers the requirements established in the Management Standards adopted by the concession (e.g. ISO 9.001, ISO 14.001, ISO 45.001). Although it also monitors compliance with IMS aspects and current regulations by contractors and subcontractors, the Concessionaire will prepare a procedure for monitoring the environmental, social, labor and occupational health and safety performance of its contractors and subcontractors.

Environmental authorities, labor management, occupational health and safety, cultural management and archaeology authorities will also conduct visits to the Project in order to supervise compliance with applicable administrative acts and permits. IDB Invest, with the assistance of an Independent Environmental and Social Consultant firm ("IESC"), will conduct ongoing monitoring of the Project's implementation.

#### 4.1.1.h Stakeholder engagement

The engagement and participation process with social actors for the rail corridor is structured into several components developed within the CSMP. The Community Strengthening Program includes a Stakeholder Map that contains: i) identification of actors by municipality and village; ii) classification by type of actor (institutional, community, media, CSO, etc.); iii) the level of influence, interest and category (ally, opponent, beneficiary, affected) of each actor; iv) communication channels by actor; v) their needs and expectations; vi) a detailed record in Excel-type format; and vii) procedures for quarterly updating.

#### 4.1.1.h.i Information disclosure

The Project has a Communications Plan that establishes strategies and tools to ensure a permanent flow of information to interested parties, such as: i) publications on social networks; ii) monthly bulletins and informative pieces; iii) short videos on project progress; iv) dissemination of calls and scheduling of mobile offices; and v) pedagogical material (posters, flyers, brochures) on road safety, environmental and social management topics. Additionally, the Concessionaire discloses project information through its website.<sup>7</sup>

#### 4.1.1.h.ii Informed consultation and participation

The Community Information and Participation Program of the CSMP defines a structured scheme of informative meetings in each FU of the Project: i) kick-off meetings, which are held at least 30 days before starting rehabilitation works, to inform authorities and the community about activities, schedule, user service mechanisms, labor recruitment procedure and scope of social and environmental management; ii) progress meetings, which are held at 50% of the progress of interventions, to report progress and preliminary results of social and environmental programs, gather perceptions and adjust actions and closing meetings would be held before completing

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<sup>6</sup> Comprised of Cajín Diseños, Servinc, Latinconsult, Engevix

<sup>7</sup> <https://lfc.com.co>

interventions in each FU, to present the final status of works, results of social and environmental management and recommendations for infrastructure conservation.

To date, the Concessionaire has held eight community socialization and dissemination events for<sup>8</sup> the Project, which addressed topics such as: i) the presentation of the companies participating in the Project; ii) the scope, schedule and projected activities; iii) the contractual social management process (CSMP); iv) details of how environmental and social issues will be managed; v) a description of topics related to land management; vi) a description of the community participation committee; and vii) a detail of the project's benefits. At each event, a space for questions and suggestions was guaranteed.

#### 4.1.h.iii Indigenous peoples

No indigenous peoples or territories have been identified in the Project's area of influence.

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

The stakeholder engagement process in the Project is the responsibility of the Concessionaire, without direct government participation.

#### 4.1.i External communications and grievance mechanism

##### 4.1.i.i External communications

The Project has a formal procedure for managing external communications established primarily in the Community Information and Participation Program of the CSMP, which regulates the preparation, validation, issuance and recording of all communications addressed to communities, authorities and other external actors.

##### 4.1.i.ii Grievance mechanism for affected communities

The User Service Program ("USP") of the CSMP establishes a Petitions, Complaints, Claims and Suggestions System ("PCCS") that allows receiving and managing communications from citizens through multiple channels: in-person service, telephone lines, email, WhatsApp, website and mobile offices. The procedure covers the stages of reception, registration and filing, classification, transfer to the competent area, response, notification to the user, closure and archiving. The USP also contemplates: i) response deadlines for processing PCCS (in accordance with Law 1755 of 2015); ii) monthly monitoring of the process (percentage of PCCS responded to, compliance with legal timeframes and operation of fixed and mobile offices); and iii) semi-annual satisfaction evaluations

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<sup>8</sup> These were: i) Champan, Chinela, and Serenos in the municipality of Curumani; ii) Puerto Viejo, Andian, Mahoma, El Cedro, Palmares, Palenquillo, La Estación, Cascajal, El Progreso, Sabanas de Caballero, Sabana de Chapetón in the municipality of Gamarra and Butarama in the municipality of Aguachica; iii) La Banca, San Martín, Cesar; iv) La Estación La Gloria and the Vereda Torcoroma in the municipality of La Gloria; v) Pacho Prieto, municipality of Chiriguaná; vi) Palestina in the municipality of Pailitas and Palestina in the municipality of Tamalameque; vii) Pueblo Nuevo (San Martín), Corregimiento de Santa Lucía (San Martín), and Corregimiento de Cuatro Bocas (San Martín) and viii) Rivera, Diviso, Cañaguat in the municipality of Pailitas and Mata de Barrios in the municipality of Tamalameque.

(applied by an independent third party) of users who have used the mechanism. However, the Concessionaire will update this mechanism to allow the capture and processing of anonymous complaints.

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

The User Service Program of the Project's CSMP: i) has differentiated measures for people in vulnerable conditions, guaranteeing accessibility and adequate service; ii) establishes specific procedures for people with disabilities (conditions in service offices, accessible spaces and appropriate furniture); iii) contemplates the need for verbal petitions made by people with reading limitations to be recorded by social personnel through transcription or authorized recording.

#### 4.1.i.iv Reporting to affected communities

The CSMP contemplates the periodic presentation of information and reports to the communities of the Direct Area of Influence ("DAI") through the participation mechanisms established in the Community Information and Participation Program.

## **4.2 Labor and working conditions**

### 4.2.a Working conditions and management of labor relations

The Concessionaire has policies, procedures, and instruments to ensure compliance with current labor regulations, such as: i) the provisions contained in the 2025 Labor Reform (Law 2,466 of 2025), whose objective is to strengthen a fair, equitable, and sustainable work environment, balancing the rights and duties of employers and workers, and which regulates aspects such as working hours, minimum wage, vacations and leave, contracts, job stability, gender equality, and dialogue mechanisms between employers and workers; and ii) the conventions signed and ratified with the International Labour Organization ("ILO"), such as Convention 155 (OSH), Convention 187 (promotional framework for OSH), and Convention 29 on forced labor.

#### 4.2.a.i Human resources policies and procedures

The Concessionaire has Internal Work <sup>9</sup>Regulations ("IWR"), as well as labor management policies and instruments, which include: i) a Coexistence Manual; ii) a Code of Ethics and Conduct; iii) a Human Rights Policy; iv) a Human Resources Policy; v) a Work Disconnection Policy; vi) a Workplace Harassment Policy; and vi) a Gender Equity, Diversity and Inclusion Policy.

#### 4.2.a.ii Working conditions and terms of employment

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<sup>9</sup> The Internal Work Regulations address topics such as conditions for worker admission; probationary periods; work schedules; overtime; mandatory rest days; vacations, leaves, and permits; salaries; medical services; security measures; occupational risks; occupational health and safety standards; prohibited work for minors under 18 years of age; obligations and prohibitions for the company and workers; the scale of offenses and disciplinary sanctions; procedures for verification of offenses and forms of application of disciplinary sanctions; mechanisms for prevention of workplace harassment; internal resolution procedure; and mechanisms for prevention, investigation, and sexual harassment.

The Concessionaire has been complying with national labor legislation, including the 2025 Labor Reform (Law 2466 of 2025). To date, it has signed employment contracts with all its direct employees, an instrument that specifies working conditions and guarantees acquired labor rights (bonuses, severance payments, and health and pension payments). Salaries have been paid in a timely manner.

#### 4.2.a.iii Labor organizations

The Concessionaire's IWR recognizes the right of workers to associate and prohibits any type of limitation or pressure on workers in the exercise of this right.

#### 4.2.a.iv Non-discrimination and equal opportunities

The IWR: i) prohibits any type of discrimination based on sex, gender identity, sexual orientation, or any other aspect of their personal life that is not related to or does not influence their work performance; ii) prohibits racism, xenophobia, and any form of discrimination based on political ideology, ethnicity, or religious creed in the workplace; iii) defines mechanisms for the prevention, investigation, and punishment of sexual harassment and workplace harassment; and iv) considers any type of sexual or workplace harassment as a serious offense that may result in termination of the employment contract.

#### 4.2.a.v Workforce reduction

Before starting the construction phase of the Project, the Concessionaire will develop and implement a workforce reduction plan, which will comply with all corresponding legal and contractual requirements, and will seek to mitigate the adverse impacts of worker termination.

#### 4.2.a.vi Grievance mechanism

The Concessionaire has a mechanism for employee attention (its own and for contractors and subcontractors working on the Project), which handles petitions, complaints, claims, and suggestions from personnel through: i) email (buzoninterno@lfc.com.co) ii) physical mailboxes, installed at each of the Project sites; and iii) verbal and in-person requests made to Human Resources personnel. The procedure establishes the possibility of submitting anonymous complaints.

Complaints related to sexual and gender-based violence are processed by the Concessionaire's Labor Coexistence Committee. The Client's Human Resources Area conducts monthly monitoring of how the mechanism is functioning (development and response).

The Concessionaire will socialize the internal complaints mechanism with its employees, contractors, and subcontractors as follows: i) as part of the induction process for new personnel; ii) through periodic short talks (five minutes) at the beginning of the workday; and iii) through events provided for in the training plan.

#### 4.2.b Workforce protection

##### 4.2.b.i Child labor

The Concessionaire does not hire minors.

##### 4.2.b.ii Forced labor

The Concessionaire has not engaged in the hiring of unpaid labor (slave labor).

#### 4.2.c Occupational health and safety

The Concessionaire implements an Occupational Health and Safety Management System (OSH MS) in accordance with what is established <sup>10</sup>in local legislation. In this regard, the medical services required by workers are provided by Health Promoting Entities ("EPS"), Occupational Risk Administrators ("ARL"), Health Service Providers ("IPS"), and in case of non-affiliation, by the Concessionaire.

The Concessionaire will keep statistics on work accidents and occupational diseases, determining severity and frequency rates. It will also conduct an evaluation of workstations, which will allow it to define the appropriate protective elements for each task, according to the risk and frequency of exposure, as well as the physical adaptations that allow each worker to access bathrooms and drinking water.

#### 4.2.d Provisions for persons with disabilities

The Concessionaire will present a procedure to operationalize what is provided by local <sup>11</sup>legislation and: i) ensure non-discrimination of persons with disabilities; ii) adopt reasonable accommodations in the workplace; iii) ensure accessibility in facilities, information, and communications.

#### 4.2.e Workers hired by third parties

The local labor hiring policy for the Project establishes guidelines for the recruitment, selection, and hiring of required personnel (its own and contractors and subcontractors), including operational, technical, and administrative positions.

The Concessionaire's Contractors Manual on Occupational Health and Safety: i) establishes OSH and Road Safety requirements for contractor and subcontractor companies; ii) provides tools to contractors for the implementation of the OSH MS and Road Safety; and iii) requires performance evaluations of contractors. The Manual requires contractors to submit: i) an OSH MS manual, ii) an annual work plan for the Strategic Road Safety Program (PESV), iii) the Social Security System Affiliation registration, iv) Industrial Hygiene and Safety Regulations; v) evidence of the formation

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<sup>10</sup> Single Regulatory Decree 1072 of 2015 issued by the Ministry of Labor, Resolution 312 of 2019, Resolution 3077 of 2022, and other concordant, modifying, or additional regulations.

<sup>11</sup> Laws 1618 of 2013 and 2466 of 2025, and Labor Reform.

of the Joint Occupational Health and Safety Committee ("COPASST") or the Occupational Health and Safety watchman, vi) evidence of the establishment of a Road Safety <sup>12</sup>Committee; vii) a PESV self-management report; and viii) monthly reports on operational management in OSH and road safety.

#### 4.2.f Supply chain

The Concessionaire will extract the materials required by the Project from authorized sites that have permits issued by the competent authority. The Concessionaire will verify that its contractors and subcontractors comply with the provisions of the Contractors Manual, especially regarding child labor and forced labor.

### **4.3 Resource efficiency and pollution prevention**

#### 4.3.a Resource efficiency

The Water, Paper and Energy Saving and Rational and Efficient Use Program, which is part of the Concessionaire's IMS, has a procedure for the efficient use of natural resources through measures to optimize consumption, reduce losses, and promote operational practices. The program incorporates consumption diagnostics, periodic inspections, preventive maintenance of hydraulic and electrical networks, awareness campaigns, and paper reduction and reuse actions, as well as monitoring through monthly and quarterly indicators that allow performance evaluation and ensure continuous improvement.

#### 4.3.a.i Greenhouse gases

The Sustainable Contribution Program – Climate Change Mitigation ("SCP"): i) defines a methodology for estimating the Project's GHG based on the guidelines of the Intergovernmental Panel on Climate Change ("IPCC"), the methodological tool of the United Nations Framework Convention on Climate Change ("UNFCCC") for emissions from fossil fuel combustion, and the Greenhouse Gas ("GHG") Protocol for the delimitation of sources and scopes; and ii) establishes detailed procedures for the identification and classification of sources, the calculation of the baseline, the projection of the reference scenario, and the definition of mitigation targets.

The Concessionaire has selected the year 2026 as the base for building its greenhouse gas ("GHG") inventory. Based on these results, it will define the Project's Mitigation Plan, which will contain measures such as i) energy efficiency; ii) efficient fuel management; iii) logistics optimization; and iv) GHG inventory management.

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<sup>12</sup> The Occupational Health and Safety (OHS) Watchman is a worker designated in companies with fewer than 10 employees to promote, monitor, and support the implementation of the OHS Management System (OHS-MS).

#### 4.3.a.ii Water consumption

The Project activities that require water consumption during the construction phase are: i) production of sleepers; and ii) the preparation of concrete (to be used mainly in the construction of priority works and buildings).

The drinking and industrial water that the Project will require will be provided by nearby aqueduct systems (water purchase and sale contracts), except for the Gamarra, Zapotosa, and San Rafael stations, where it will be provided by wells duly authorized by the competent Environmental Authority.

#### 4.3.b Pollution prevention

ESAP includes programs for managing and controlling the environmental risks and impacts of UF1, UF2, and UF3. Among these, the following programs can be named: i) environmental management and control; ii) management of (a) excess material disposal areas ("ZODMES"), (b) quarries, (c) solid and liquid waste, (d) water, and (e) soil; iii) sediment control, slope and embankment stability; and iv) biannual monitoring of daytime and nighttime noise at the Gamarra, Barrancabermeja, Carare, Grecia, and México railway stations.

Despite the above, the Concessionaire will prepare and implement a Noise and Vibration Management Plan ("PGRV") for the construction, operation, and maintenance phases of the Project that: i) allows for the prevention, reduction, and control of noise and vibrations at work fronts and industrial areas; ii) considers critical receptors; iii) includes management measures for vibrations induced by machinery; iv) contains an inventory of structures that may possibly be affected by vibrations; and v) contains protocols to evaluate potential claims for vibration damage to nearby structures.

#### 4.3.b.i Waste

The Project will generate construction and demolition waste ("RCD"); domestic solid waste, industrial solid waste, hazardous solid waste, and liquid waste; clearing and cleaning surplus; and waste from the rehabilitation of infrastructure and superstructure (wooden sleepers, concrete sleepers, metal rails, ballast and sub-ballast surplus). The ESAP includes measures aimed at the proper management of this waste, which include its separation, reuse, temporary storage (at the México, Grecia, Carare, Barrancabermeja, San Rafael, Gamarra, and Zapotosa stations), and transfer to recovery sites (recycling) or final disposal sites (duly authorized municipal landfills).

To date, the Concessionaire is in the process of selecting managers for: i) RCD, ii) domestic waste, iii) sanitary wastewater, and iv) hazardous waste.

#### 4.3.b.ii Hazardous materials management

The Emergency and Contingency Prevention, Preparedness, and Response Plan establishes guidelines for the management and response to incidents involving hazardous materials, including protocols for the transport of dangerous goods, verification of safety data sheets, labeling,

substance compatibility, and specific procedures for handling dry spills, liquid spills, fires, and explosions, as well as the activation of the Incident Command System in situations involving hazardous chemicals. It also contemplates preventive actions, initial containment, and internal communication during the emergency, along with training requirements in hazardous substance handling and plan implementation.

The Concessionaire will update this plan to incorporate in detail the procedures for handling chemical substances, spill response, storage, handling and disposal of hazardous materials, as well as the training and personnel instruction contents.

#### 4.3.b.iii Pesticide management and use

The Concessionaire has a protocol for pesticide management and chemical risk management, aligned with current regulations. This protocol prohibits the use of compounds classified in categories 1a and 1b of the World Health Organization.

### **4.4 Community health and safety**

#### 4.4.a Community health and safety

Considering that it is the only access route to multiple homes and properties in the region, the railway corridor has been used by different community actors, who travel on it in "motomesas" (for family and collective use), a wooden platform with rollers that is propelled through the railway corridor by a motorcycle.

On the other hand, given that there is no vehicular crossing, the railway bridge over the Sogamoso River is also used for the crossing of vehicles (cars, vans, trucks, motorcycles) and pedestrians.

Given the inherent risk presented by the motomesas that move uncontrolled on the railway line and the use of the Sogamoso bridge for vehicular and pedestrian traffic, the Concessionaire will prepare and implement a Community Health and Safety Plan that will analyze these risks and include: i) a road safety and traffic management program; and ii) measures for emergency preparedness and response in case of accidents with users on the railway corridor. It will also formulate and implement a level crossing regularization plan, according to the typologies defined in the Colombian standard (A, B, and C), and will define actions for the management of informal crossings.

#### 4.4.a.i Infrastructure and equipment design and safety

The Project incorporates safe design and infrastructure and equipment protection measures through the implementation of structural and operational systems aimed at preventing risks to the communities in the area of influence.

The Emergency Response Plan establishes procedures for operational coordination with external entities, activation of call chains, integration of support groups, and definition of information centers and authorized communication protocols, in the event of failures, unforeseen events, or technological emergencies.

#### 4.4.a.ii Hazardous materials management and safety

The Concessionaire has measures for the prevention and response to emergencies associated with the handling of hazardous materials during the execution of its activities and that involve communication with municipal response agencies.

#### 4.4.a.iii Ecosystem services

The most relevant ecosystem services in the Project's area of influence are associated with provisioning services, especially food. These will not be materially affected by the Project.

#### 4.4.a.iv Community exposure to diseases

Given that the majority of the labor force that the Project will use will be of local origin, an increase in the community's exposure to new diseases is not expected, beyond what is currently recorded.

#### 4.4.a.v Emergency preparedness and response

The Emergency Response and Preparedness Plan include formal and operational measures for coordination with the community and authorities in the area of influence, before, during, and after an emergency.

#### 4.4.b Security personnel

The Concessionaire has security services provided by a subcontractor firm duly authorized by the competent entity, which has presented, among other aspects, procedures for the safe handling of weapons, a set of safe rules and procedures that guards must observe, and specific measures for safe loading and unloading of weapons.

The Concessionaire, however, will develop a Security Management Plan that will include: i) an assessment of security risks for the Project; ii) procedures to verify backgrounds of human rights abuses by security personnel; iii) procedures for the use of force; iv) training requirements in human rights and in the use of force for security personnel to be hired; v) protocols to manage additional risks derived from the security measures implemented, for those inside and outside the facilities; and vi) a detail of the training and equipment needs of security personnel.

### **4.5 Land acquisition and involuntary resettlement**

#### 4.5.a General aspects

The activities related to property management in the Project consist of those that the Concessionaire must exercise over the Available Area ("AD") and over the properties required for complementary works.

Within the AD are (31) properties that make up the railway corridor available for rehabilitation, operation, and maintenance (UF1), which, being State property, were delivered in custody to the Concessionaire within the framework of the concession contract and only require administrative procedures called basic sanitation, to formalize the acquisition.

The Concessionaire, by virtue of the concession contract, must also build five new associated infrastructures (heavy workshop, light workshop, Cargo Transfer Center "CTC", Operations Control Center "CCO", and administrative building "ADM"), for which the acquisition of twenty (20) properties is estimated to be required. Of these (which mostly correspond to medium and large-scale agricultural land), the Concessionaire has already managed 60% of early deliveries and has identified nine (9) affected family groups, which were relocated to replacement housing, according to Colombian regulations.

Although UF1 does not require the purchase of new properties for its operation, in approximately 10% of its total length (in the south and center), there are irregular occupants (vulnerable people who do not have legally recognizable rights to the land) who have settled within the minimum safety strip (not in the operational one) of the railway line. Even though the clearance of this strip is not a condition for the start or delivery of the interventions contemplated in the Project, the corresponding concession contract contemplates the execution of <sup>13</sup>Relocation Plans to guarantee the physical and economic resettlement of these Social Units ("US"), which, based on the preliminary information available, are estimated to be around 1200. Additionally, the Project, for safety reasons, contemplates the relocation of two educational institutions that are located near the railway. For the latter, the construction of the new facilities that will replace the current ones.

To date, Concessionaire has acquired the area required for the construction of the bridge over the Sogamoso River, which will allow it to begin the planned activities.

The Concessionaire will present a consolidated matrix that allows tracking of compensation for land, buildings, social compensation and for economic activities, payment dates, visits and follow-up meetings for the relocation process and ex-post monitoring.

#### 4.5.a.i Project design

The Project, in itself, does not produce any type of involuntary resettlement. However, the concession contract, for security reasons, but not for operational requirements, contemplates the <sup>14</sup>acquisition of land and the resettlement of irregular occupants of the minimum-security strip of the railway line.

#### 4.5.a.ii Compensation and benefits for displaced persons

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<sup>13</sup> Framed within ANI Resolution 077 of 2012

In cases where displacement cannot be avoided, Colombian regulations contemplate <sup>15</sup>a defined procedure for land acquisition. This process is reinforced and fully described in Technical Appendix 7: Land Management, of the Concession Contract.<sup>16</sup>

The calculation of compensation for persons who have legally recognizable rights over land and buildings provides for an appraisal of the assets carried out by a third party, which generates the cost of the property at new price. A depreciation factor is applied to this value to establish its market value and ensure that the final compensation cost is sufficient to replace the asset to be disposed of.

Both occupants who have legally recognizable rights over the land, and those who only occupy land in the security strip without holding title to it, are covered by a Socioeconomic Compensation Plan, which also contemplates: i) support for housing reestablishment (according to commercial appraisal); ii) support for residents; iii) relocation compensations (moving and relocation expenses); iv) economic support for economic impacts or loss of income (as applicable); and v) social accompaniment measures for relocation.

#### 4.5.a.iii Community participation

Both the Socio-Land Management Support program and the Community Information and Participation program provide mechanisms to keep the general population informed and especially the Project Affected Persons ("PAP"). However, the Concessionaire will develop a Social Stakeholder Participation Plan that guarantees: i) the participation of women in consultation activities; ii) women's access to land acquisition processes; and iii) access to resettlement plans.

#### 4.5.a.iv Grievance mechanism

Through the User Service Program and community relations offices, the Project receives complaints, claims, requests and suggestions regarding land acquisition, compensation and resettlement processes. However, the Concessionaire will establish specific procedures to guarantee timely attention and adequate response times to serve PAPs, vulnerable communities and people in land acquisition, compensation and resettlement processes.

#### 4.5.a.v Planning and execution of resettlement and restoration of livelihoods

The Land Acquisition Plan, which establishes the general framework for the land acquisition process, provides for three follow-up visits to households once relocated, the purpose of which is to monitor the conditions and livelihoods of resettled people. However, to reinforce the latter, the Concessionaire will develop and implement: i) a Resettlement Action Plan ("RAP"); ii) a Livelihood

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<sup>15</sup>Supported by Law 1682 of 2013 or Infrastructure Law, through which measures and provisions are adopted for transportation infrastructure projects and extraordinary powers are granted.

<sup>16</sup>Infrastructure Law (Law 1682 of 2013); Resolution 898 of 2014 of the Agustín Codazzi Geographic Institute; Resolution 545 of 2008 of the National Concessions Institute ("INCO"), now ANI; ANI Resolution 077 of 2012.

<sup>16</sup> This Appendix: i) specifies the general obligations of both the Concessionaire and the contractor; and ii) describes (a) the voluntary alienation process, (b) the judicial and administrative expropriation procedure, (c) the forms of restitution of public use assets, (d) the management of community benefit properties; and iii) determines the costs of land management and land acquisition.

Restoration Plan ("LRP"); iii) a Land Acquisition and Resettlement Monitoring Program; and iv) external audit of the resettlement process, which will be carried out three years after the last household has been resettled.

#### 4.5.b Displacement

Based on preliminary information available, the Project, for the clearance of the railway line security strip, required resettling approximately 1200 households.

#### 4.5.c Physical displacement

The Concessionaire is updating the socioeconomic census of irregular occupants of the railway line security strip.

#### 4.5.d Economic displacement

The census update will allow the Concessionaire to clearly identify PAPs and determine their status.

#### 4.5.e Private sector responsibilities in government-managed resettlement

By virtue of the concession contract, it is the Concessionaire who, on behalf of the Grantor, has the function of executing land acquisition, socioeconomic compensation and resettlement activities.

### **4.6 Biodiversity conservation and sustainable management of living natural resources**

#### 4.6.a General requirements

The Project is developed on an existing railway corridor (in service), which crosses modified habitats, mostly dedicated to agricultural and livestock activity. In its direct area of influence, no critical habitats have been identified as potentially affected by the Project.

#### 4.6.b Protection and conservation of biodiversity

The Biodiversity Conservation Program contained in the PAGA includes measures to prevent, mitigate and <sup>17</sup>compensate for possible negative impacts on fauna and flora within the Project's area of influence.

The ESIA of the Sogamoso Bridge project will contain specific measures for the prevention of impacts on biodiversity derived from the execution of these works.

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<sup>17</sup> These, among others, include measures for: i) modeling worker behavior; ii) erosion control and solid contributions to water bodies; iii) maintenance of natural drainage; and iv) definition and criteria for the selection of work sites and borrow areas

#### 4.6.b.i Modified Habitat

The Project's area of influence is characterized by containing heavily transformed habitats, where the replacement of forests by pastures, artificial grass, crops and areas of agricultural use is evident. In this sense, no material impacts on these habitats are foreseen.

#### 4.6.b.ii Natural habitat

Although remnants of natural habitats are identified in the Project's area of influence (gallery forests, primary forest relicts and swampy areas associated with the Magdalena Medio Swamp system, which despite being highly intervened, maintain native vegetation elements and fulfill essential ecological functions), material impacts on them are foreseen.

#### 4.6.b.iii Critical habitat

As it involves the rehabilitation of a railway corridor in service, which mainly crosses modified habitats, the Project will not generate material impacts on critical habitats

#### 4.6.b.iv Legally protected and internationally recognized areas

Within the Project's area of influence are the following legally protected areas: i) the Regional Integrated Management District – Chiqueros Swamp and Caño Trapo Swamp, in the municipality of Puerto Berrío, ii) the Madre Vieja – Charca de Guarinocito Integrated Management District, in the municipality of La Dorada, iii) the water buffer zone of Guadales Creek, in the municipality of La Dorada, iv) the protected areas of Simaloa Stream and Jobito Stream, in the municipality of Chiriguaná, v) the Area of Special Ecosystem Importance, in the municipality of Gamarra, vi) the Swamp Complexes of Barrancabermeja, which include (a) the San Silvestre Wetland, (b) Los Mangos Swamp, (c) El Chiquero Swamp and (d) La Jeringa Swamp; vii) the Environmental Protection Areas, in the municipality of Cimitarra, which include water springs, water bodies and relevant ecosystems, viii) the Municipal Conservation Areas in Puerto Wilches, which include areas around the Colorado, Paturia, Yarigués, Manatí Blanco swamps and associated wetlands; and ix) the Protective Forest Reserve of the Upper Basin of Caño Alonso, in the municipalities of La Gloria and Pelaya.

None of these areas will be materially impacted by the Project.

#### 4.6.b.v Invasive alien species

The Project will not use exotic invasive species.

#### 4.6.c Management of ecosystem services

The most relevant ecosystem services in the Project's area of influence are associated with provisioning services, especially food. These will not be materially affected by the Project.

#### 4.6.d Sustainable management of living natural resources

The Project does not contemplate the use or production of living natural resources.

#### 4.6.e Supply chain

The Concessionaire will make its best effort to ensure that the input required for the implementation of the Project have been extracted or processed in ways compatible with rational biodiversity management.

### **4.7 Indigenous peoples**

#### 4.7.a General aspects

The Project will not generate new impacts on the uses, customs or traditional forms of occupation and use of the territory of indigenous populations, black, Afro-Colombian, raizal and palenquera communities or Roma or gypsy peoples.

The Ministry of the Interior determined the non-applicability of the Prior Consultation process for the Project, taking into account that: i) it does not cross territories of indigenous peoples or black communities; and ii) the scope of its activities (rehabilitation, maintenance, operation, land management, social and environmental management of the corresponding infrastructure) will not generate negative impacts on indigenous populations or black communities.

### **4.8 Cultural heritage**

#### 4.8.a Protection of cultural heritage in Project design

In 1996, all existing passenger stations of the railway in Colombia were declared National Monuments, so the existing passenger stations in the La Dorada – Chiriguaná railway corridor are considered Assets of Cultural Importance ("BIC"). This means that, according to applicable regulations, restorations, repairs, remodeling and protection, defense and conservation work that must be carried out on them must have prior permission from the Ministry of Culture.

The Concessionaire has an inventory of the status of the railway stations included in the Project and is evaluating the intervention needs (provision of sanitary units, painting and minor civil works) in each of them. For this, it will prepare a Cultural Heritage Management Plan that will contain: i) intervention rules for each structure; ii) compatible construction methods; iii) restrictions on machinery, vibrations and loads; iv) preventive conservation measures; and v) monitoring actions before, during and after interventions.

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The Preventive Archaeology Program ("PArP"), which is part of the Project's Social Management Plan, establishes actions for the protection of heritage and assets of cultural interest through management plans. The PArP requires that the Concessionaire have an archaeology team for monitoring archaeological findings.

As part of the environmental licensing process for the bridge over the Sogamoso River, the Concessionaire also submitted a PARP and is advancing the approval process before the Colombian Institute of Archaeology and History ("ICANH").

#### 4.8.a.i Procedures in case of chance findings

The Concessionaire will design a chance findings protocol, which will be socialized with workers and the community. The PGSC establishes that in these cases the Concessionaire must report the finding to ICANH within 24 hours, secure the area, implement actions for the protection and conservation of archaeological heritage, and follow the guidelines established by current regulations.

#### 4.8.a.ii Consultations

During socialization and dissemination events, the Concessionaire has presented the conditions of the railway stations and the scope and competence it has over their maintenance and preservation. Likewise, it is approaching territorial entities to reach agreements regarding the use and maintenance of railway stations.

#### 4.8.a.iii Community access

The community can access the railway stations. The Concessionaire is formulating a promotion plan for the recognition of the value of railway stations by surrounding communities.

#### 4.8.a.iv Removal of reproducible cultural heritage

The Project will not cause the removal of reproducible cultural heritage.

#### 4.8.a.v Removal of irreproducible cultural heritage

The Project will not cause the removal of irreproducible cultural heritage.

#### 4.8.a.vi Critical cultural heritage

The Project will not cause the removal of critical cultural heritage.

#### 4.8.b Use of cultural heritage by the project

The Project will not use cultural heritage.

### **5. Local access to project documentation**

Documentation related to the Project can be accessed at the following link: <https://lfc.com.co>