

## Environmental and Social Review Summary (ESRS)

### Buenaventura Highway Corridor – Loboguerrero - Buga - COLOMBIA

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#### 1. General Information of the Project and Scope of IDB Invest's Environmental and Social Review

The construction, upgrade, and operation of the Buenaventura – Loboguerrero - Buga (the “Corridor”) Highway Corridor, which spans 128 kilometers, is a Fifth Generation Concessions (“5G”) project led by the Government of Colombia through the National Infrastructure Agency (“ANI”). This project was awarded to Unión Vial Camino del Pacífico, S.A.S. (the “Concessionaire”, “UVCP” or the “Client”), a company composed of 99% Sacyr Concesiones Colombia S.A.S., a subsidiary of Sacyr Concesiones S.L. and 1% by Sacyr Concesiones Participadas I. SL.

This transaction (the “Project”) involves the financing, construction, rehabilitation, improvement, commissioning, operation, and maintenance of the Corridor, located in the Department of Valle del Cauca, Colombia.

For construction purposes, the Project has been divided into twenty-two sections or Functional Units (“FUs”).<sup>1</sup> Its pre-construction phase (which includes, among other activities, the preparation of technical studies and final designs, the operation and maintenance of existing roads, and the processing and acquisition of the required permits, licenses, authorizations, and concessions from state and environmental authorities to begin construction) began in early 2023. The construction phase, which started in August 2024, is expected to last approximately 3.5 years, while the operation and maintenance phase (“O&M”) will extend for 29 years from the start date of the concession.

The environmental and social due diligence (“ESDD”) process included, among other aspects, a site visit; interviews and meetings with the Company’s employees, as well as with stakeholders in the area of influence; and a review of environmental and social (“E&S”), and occupational health and safety (“OHS”) information provided by UVCP.

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<sup>1</sup> UF0, which covers the O&M of the 128 km that comprise the Buenaventura – Loboguerrero – Buga corridor; FU1, FU1, a 15 km long road, which includes the upgrade and regular maintenance of the road; FU2, 6.5 km long, which includes the construction of an interchange and a second lane, as well as improvements to the existing road; FU3, which includes the construction of a parking lot, a service area, and an operations control center; FU4, 3.5 km long, which includes the construction of the second lane and the improvement of the existing one; FU5, 5.17 km long, which includes the construction of the second lane and the Citronela and Aguadulce intersections; FU6, 19.31 km long, which provides for the improvement and ongoing maintenance of the dual carriageway; FU7, 8.21 km long, which includes the construction of the Cisneros II toll booth and the upgrade of the lane; FU8, 0.96 km long, which includes the construction of a second lane and a tunnel; FU9, 3.16 km long, which includes the construction of a second lane, the improvement of the existing lane and the Cisneros crossing, and the construction of a second tunnel; FU10 and FU11, of 12.16 km each, which provide for the upgrade and regular maintenance of the left and right lanes, respectively; FU12, 4 km long, which includes the construction of the second lane, the improvement of the existing one, the construction of the Loboguerrero interchange, and completion of bridges and viaducts; FU13, 2 km long, which includes the construction of the second lane and the commissioning of bridges; FU14, 3.15 km long, which includes the construction of the second lane, the improvement of the existing one, and the commissioning of viaducts; FU15, 1.85 km long, which provides for the construction of the second lane, the improvement of the existing one, and the construction of the Zabaletas interchange; FU16 and FU17, of 14 km each, including upgrade and maintenance of the lane; FU18, 7.84 km long, which includes the upgrade and maintenance of the two lanes; FU19 and FU20, of 3.17 and 2 km, respectively, including the construction of the second lane and a bike lane; and FU21, of 2.38 km, which includes the construction of a second lane and a bike lane, as well as the improvement of the existing lane.

To ensure the Project's commitment to respecting for and protecting human rights, upholding zero tolerance for retaliation, and providing a safe environment where stakeholders can voice their concerns without fear of retaliation, the ESDD process also included a review of additional documents, such as Sacyr's Code of Ethics and Conduct, physical security personnel manuals, and training records related to human rights.

## **2. Environmental and Social Categorization and Rationale**

The project has been classified in Category A, in accordance with IDB Invest's Environmental and Social Sustainability Policy ("E&SSP") as it is likely to generate the following environmental and social impacts and risks, among others: i) increased risks to workers health and safety; ii) dust, vibrations and gas emissions; iii) increase in noise levels due to the use of heavy machinery and increased traffic; iv) generation of solid (excavation material, paving waste, rubble, paper, wood, scrap metal, oily rags, etc.) and liquid waste during construction phase; v) potential soil pollution; vi) removal of vegetation cover; vii) impact on fauna; viii) potential community safety risks associated with increased heavy machinery traffic during construction; and ix) physical or economic displacement of the population due to the release or establishment of the right-of-way. These impacts are expected to range from medium-high to high intensity.

Based on the information received and reviewed to date, the Performance Standards (PS) that the Project is likely to trigger are: PS1 Assessment and Management of Environmental and Social Risks and Impacts; PS2 Labor and Working Conditions; PS3 Resource Efficiency and Pollution Prevention; PS4 Community Health, Safety, and Security; PS5 Land Acquisition and Involuntary Resettlement; PS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources; and PS7 Indigenous Peoples.

## **3. Environmental and Social Context**

### **3.1 General Characteristics of the Project's site**

The Project is located entirely within the Valle del Cauca department ("VDC"), whose capital city is Cali. VDC is one of the thirty-two departments of the Republic of Colombia and situated within both the Andean and Pacific regions.

The Project, whose main objective is to connect the Port of Buenaventura, Colombia's main seaport, with the country's interior, includes: i) the upgrade and improvement of the 128 km of the existing corridor; ii) improvement works in 17 tunnels and 26 existing bridges; and (iii) the construction of 7.6 km of bicycle lanes, 35 km of new carriageways, and 1.4 km of additional tunnels. Existing associated infrastructure includes one operating toll station at Loboguerrero (to be relocated to Cisneros II), two weighing stations, an active Operations Control Center ("OCC"), a service area, and three customer service offices.

The area of direct influence of the Project ("ADI") comprises predominantly of flat and dissected hilly terrain bordering the Cordillera Occidental mountain range. The regional climate features stable annual temperatures ranging from 25 °C and 28 °C, typical of altitudes between 0 and 1,000 meters above sea level. Water resources within the area of influence include numerous streams that feed into the regional fluvial system, particularly tributaries of the Dagua and Cauca rivers. The ADI encompasses 7 of the 42 municipalities in the VDC: Buga, Yotoco, Restrepo, Calima Darién, La Cumbre, Dagua, and Buenaventura.

According to population estimates, these municipalities are collectively home to approximately one million inhabitants, representing a significant proportion of the department's total population.

The main economic activities in the ADI include tourism, agriculture, livestock farming, mining, and port activities. Land use in the area reflects a mix of commercial agriculture, sugarcane cultivation, extensive cattle ranching, and urbanized areas, coexisting with remnant patches of tropical dry forest and managed pasturelands.

### **3.2 Contextual Risks**

The context risk analysis conducted identified five (5) components with a high or moderate level of concern: i) security and conflict; ii) political situation; iii) social cohesion; iv) retaliation; and v) labor rights.

The territory where the Project is located has historically been affected by armed conflict due to the presence of guerrilla and paramilitary groups, which have leveraged its strategic geographic location and highway corridors for illicit activities such as drug trafficking, extortion, and kidnapping. Although the peace accords have significantly reduced the activity of insurgent groups, criminal gangs continue to operate in the region, posing security risks to the population. However, these activities are mainly concentrated in the southern region of the department and the urban area of Buenaventura, far from the Project's highway corridor.

In terms of social cohesion, inequalities, inclusion gaps, and group grievances have the potential to trigger protests along main roads. This has occurred with some frequency on the Loboguerrero - Buenaventura corridor, where demonstrators have demanded greater state presence to address issues related to security, energy, and healthcare, among others. In response to these risks, the Concessionaire has retained specialized consultancy services to identify, analyze, and manage potential security threats. It has also implemented a comprehensive surveillance system that incorporates advanced technology, including security cameras and satellite monitoring.

It is worth noting that prior to the award of this contract to UVCP, a previous concessionaire was responsible for the execution of the works included in the Project, as well as the management of its socio and environmental impacts.<sup>2</sup> In this context, UVCP has assumed responsibility for inherited environmental and social liabilities, ensuring their management in accordance with Colombian environmental regulations, the commitments outlined in the Project's environmental studies and licenses, and the agreements with the financing bank.

## **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 developed an Environmental and Social Management System ("ESMS") that complies with the following ISO standards: ISO 9001 (quality), ISO 14001 (environmental management system) and ISO 45001 (occupational health and safety).

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<sup>2</sup> As part of the "Construction of the Second Lane - Loboguerrero - Mediacanoa Section" contract.

#### 4.1.b Policy

The Project has a Quality, Environment, and Energy Management Policy, as well as a Sustainability Policy, which covers various areas of application and addresses issues related to social impact, the fight against inequality, quality, environmental stewardship, governance, human resources and work-life balance, health and safety, innovation, and human rights. These policies are communicated to workers during their induction process and annually through re-induction sessions.

#### 4.1.c Identification of Risks and Impacts

##### 4.1.c.i Direct and Indirect Impacts and Risks

To date, the Project has Environmental Impact Assessments (“EIAs”) and Environmental Guidance Adaptation Plans<sup>3</sup> (“EGAP”) for all FUs. It holds nine (9) environmental licenses that were obtained and managed by the previous concessionaire, subsequently transferred to the National Highway Institute (“INVIAS”) then to the National Infrastructure Agency (“ANI”), and finally endorsed to UVCP. Although Colombian legislation does not require it, as the changes are considered minor, the Concessionaire is in the process of amending six (6) of the nine (9) existing licenses to meet requirements that are specific to the works in FUs 5, 7, 12, 13, 14, and 15.1. Similarly, although (a) the Project’s design and alignment have not substantially changed from their original conception and (b) the EIA-related studies cover the same footprint and area of impact, UVCP has completed the preparation of a new EIA to address modifications in FU8 and FU9, which currently under review by the National Environmental Licensing Authority (“ANLA”).

The Concessionaire also has a procedure in place for identifying and evaluating environmental aspects arising from its activities, which uses matrices to summarize the significance, magnitude, and likelihood of occurrence of each impact.

##### 4.1.c.ii Analysis of Alternatives

Since these activities focus on the replacement or repair of an existing asset, the Project did not include a formal analysis of alternatives to the original alignment of the highway corridor. However, in the design of new works, the best options were identified to reduce involuntary resettlement and minimize the environmental and social (“E&S”) impacts<sup>4</sup>.

##### 4.1.c.iii Cumulative Impacts

UVCP has conducted an independent preliminary cumulative impact assessment for each FU. For this purpose, it identified the following as Valuable Ecosystem Components (“VEC”): tropical dry forest, surface and groundwater bodies, and flora and fauna. Based on this analysis, the Concessionaire has adopted measures to minimize impacts on these VECs, including replanting in disturbed areas, the construction of wildlife crossings, and continuous monitoring of water and air quality.

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<sup>3</sup> EGAP is a document that sets out the environmental management programs or projects, taking into account the social and environmental impacts that may be generated, depending on the type of activity and the socio-economic, physical, biotic, and cultural characteristics of the area where the project is developed.

<sup>4</sup> Such as adjusting the geometric design of tunnels and roads to reduce the impact on sensitive ecosystems and nearby communities; prioritizing the use of already intervened areas to minimize the impact on sensitive habitats such as the tropical dry forest; or optimizing the disposal areas for leftover material to mitigate the impact on sensitive communities and ecosystems.

Nevertheless, UVCP will update this analysis using the entire Corridor as a basis and will evaluate the incremental impacts that past, ongoing, and planned future projects may have on identified VECs, and will develop a cumulative impact management plan. To perform this analysis, the Concessionaire will follow IDB Invest's Practical Guide for Cumulative Impact Assessment and Management in Latin America and the Caribbean<sup>5</sup>.

#### 4.1.c.iv Gender Risks

The environmental studies conducted for the Project have identified the following risks faced by women: i) structural and cultural barriers that limit their equal participation; ii) a disproportionate burden of domestic work; iii) restrictions on mobility; iv) unequal access to economic resources and employment opportunities; and v) limited representation in decision-making processes.

Likewise, the contextual risk analysis highlights that social tensions, reprisals, and conflicts in the region could increase women's exposure to specific forms of gender-based violence, including domestic and sexual violence in an environment of heightened insecurity. These gender dynamics could intensify women's vulnerability to the Project's impacts, particularly in terms of economic, social, and safety-related exclusion.

#### 4.1.c.v Gender Programs

The Project has implemented various measures to address gender-related risks, including gender-sensitive labor recruitment and the promotion of equal conditions for men, women, vulnerable groups, people with disabilities, and individuals with diverse gender identities. In addition, the Project has a strategy called "*Mujeres Todoterreno*" ("All-terrain Women"), which aims to i) develop women's skills in infrastructure, ii) empower women through technical courses such as scythe operation and gasoline engine repair, and iii) strengthen their employability by expanding training in construction and site work.

However, the Client will develop an integrated gender-based violence ("GBV") risk management framework that will include: i) a comprehensive policy on gender-based violence and harassment; ii) the update and integration of internal and external grievance mechanisms to address GBV-related complaints; iii) a specific plan to manage gender risks; and iv) mandatory training modules for direct and indirect employees, with a focus on GBV prevention and the promotion of a safe and equitable environment.

#### 4.1.c.vi Climate Change Exposure

The Concessionaire has conducted a comprehensive assessment of climate change risks in the Project's area of influence, considering climate scenarios for the years 2040, 2070, and 2100. This analysis, which incorporated variables such as sea level rise, changes in average air temperature, and variations in precipitation, identified flooding<sup>6</sup> —particularly at the ends of the corridor in Buga and Buenaventura—, and landslides in the central section of the corridor, exacerbated by the ENSO phenomenon,<sup>7</sup> as the main threats. In response, and to ensure the resilience of the infrastructure under future climate scenarios, the Project will incorporate slope, drainage, structural, and pavement stabilization works, and will develop corresponding emergency protocols.

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<sup>5</sup> <https://idbinvest.org/es/publicaciones/guia-practica-para-la-evaluacion-y-gestion-de-impactos-acumulativos-en-america-latina>

<sup>6</sup> Which will intensify as a result of climate change.

<sup>7</sup> ENSO: El Niño-Southern Oscillation, a natural climatic phenomenon that affects the temperature of the ocean and the atmosphere.

The Project is considered aligned with the Paris Agreement, based on an analysis conducted using the IDB Group's Implementation Approach for Alignment with the Paris Agreement.

#### 4.1.d Management Programs

Management programs are primarily governed by contractual instruments such as the EGAP and the Contractual Social Management Plan ("CSMP"). These instruments include a series of programs and plans designed to mitigate risks and undesirable impacts, including the integrated management of construction materials and solid, liquid, and hazardous waste, as well as surface and groundwater management.

In addition, UVPC has: i) implemented protocols to protect biodiversity, strategic ecosystems, wildlife, and manage epiphytes; ii) installed environmental signage at work fronts; iii) implemented programs to restore affected areas; iv) prioritized community participation in project works and in the processes of land and right-of-way acquisition; v) implemented mechanisms to address complaints; vi) launched road safety awareness programs; and vii) conducted educational outreach activities targeting neighboring communities.

#### 4.1.e Organizational Capacity and Competency

UVCP and the engineering, procurement, and construction ("EPC") contractor, Sacyr Ingeniería e Infraestructura, have established robust organizational structures for the environmental, social, and occupational health and safety ("OHS") management of the Project. In this regard, the Concessionaire's E&S management is distributed across four roles reporting directly to general management: (i) the Property Director, responsible for land acquisition, resettlement, and compensation processes, leads a team of 33 people; (ii) the Environmental Director, responsible for compliance with environmental licenses and environmental management plans, is supported by a team of 11, including three field supervisors and one Geographic Information Systems ("GIS") specialist; (iii) the Social Director, responsible for prior consultation processes and community engagement, is supported by three coordinators and field staff; and (iv) the Head of OHS, who leads a team consisting of two inspectors specialized in occupational safety. In addition, the Concessionaire relies on external consultants to prepare the environmental studies required for license amendments and forest reserve exemption processes.<sup>8</sup>

The EPC contractor's Environmental, Social, Occupational Health and Safety Management team is led by an environmental manager, to whom an archaeologist, an environmental coordinator, a GIS professional, a biologist, and a social coordinator report. The OHS team is led by an OHS manager and includes several occupational health and safety technicians. These teams will be scaled up as needed to respond to the demands of the Project.

#### 4.1.f Emergency Preparedness and Response

The Concessionaire has an Emergency Preparedness and Response Plan ("EPRP") and a Contingency Plan that identify threats and vulnerabilities and establish standard operating procedures to be followed if risks materialize. In addition, these plans include, among other elements, details on the composition of the

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<sup>8</sup> Process through which the Environmental Authority evaluates the appropriateness of lifting the legal status of a forest reserve (Law 2° of 1959) in a specific area for the development of a project, work or activity.

emergency response teams, personal training requirements, necessary resources, the communication chain before, during, and after the occurrence of unforeseen events, as well as the format and frequency of emergency drills.

#### 4.1.g Monitoring and review

The Project has a Monitoring and Review Plan that includes a detailed description of the measures required to gather information on the performance of the implementation of the E&S management measures contained in the respective programs,<sup>9</sup> the development of key performance indicators, and the specific records or documentation required to verify compliance. The results of this plan are submitted quarterly to ANLA.

Additionally, to verify the effectiveness of its ESMS and its compliance with national regulations and contractual obligations, UVCP conducts annual internal audits, the results of which are communicated to senior management as part of the continuous improvement process.

#### 4.1.h Stakeholder Engagement

The Concessionaire has a Stakeholder Engagement Plan that, from the early stages of the Project and through monthly meetings, has disseminated information to communities within its ADI to enable them to express their concerns. However, the plan has primarily focused on ethnic communities. In this regard, and to prioritize relationship strategies that address the risks and challenges of the Project's social management, the Client will update the plan to: i) include non-ethnic communities; and ii) assess the power, influences, needs, and expectations of each of the key stakeholder group.

##### 4.1.h.i Disclosure of Information

The Concessionaire has implemented a Community Information and Engagement Program ("CIEP") that integrates both community-based and mass social communication strategies. In addition, it maintains a continuous flow of information with local authorities and communities within the Project's ADI, primarily through the Community Action Boards ("CABs"). As part of its communication strategy - and with the aim of disseminating general information about the Project, including its potential impacts and benefits - UVPC has developed and distributed informative materials (including brochures and online videos), and organizes periodic meetings<sup>10</sup> with communities and local authorities at the departmental, municipal, and village levels to provide updates on Project progress, share details on environmental and social management, and present information works in progress.

##### 4.1.h.ii Informed Consultation and Participation

The consultation process with affected communities carried out by the Project guarantees access to relevant information before, during, and after the execution of the works. In this regard, it has held socialization meetings with CABs, social organizations and local authorities, promoting the effective participation of various population groups, including women, Afro-descendant communities, and people living in vulnerable conditions. UVPC continues engage with the communities and other stakeholders to,

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<sup>9</sup> Abiotic, biotic, and socioeconomic aspects.

<sup>10</sup> Routinely at the beginning, during, and at the end of the interventions, and extraordinarily according to the needs of the stakeholders or when requested by them.

among other objectices, define the location of certain infrastructure (mainly pedestrian bridges), review some pedestrian mobility measures, and address aspects related to programs aimed at minimizing negative impacts and maximizing the social and economic benefits of the Project, including employment opportunities.

#### 4.1.h.iii Indigenous Peoples

As required by local legislation, the Project has conducted sixteen (16) free, prior, and informed consultation processes with eleven<sup>11</sup> (11) Community Councils of Black Communities (“CCBC”), the agreements from which will be honored by the Concessionaire. It is worth noting that prior to the signing of this concession contract, two prior consultation agreements were signed with two Indigenous communities,<sup>12</sup> which were concluded and approved by the respective communities and competent authorities at the time.

#### 4.1.h.iv Private Sector Responsibilities Under Government-Led Stakeholder Engagement

Under local legislation,<sup>13</sup> the Ministry of the Interior, through the Directorate of Prior Consultation, is responsible for leading and coordinating the processes of prior, free, and informed engagement with indigenous, ethnic, and Roma communities. The Concessionaire is responsible for supporting the dissemination of information and facilitating engagement spaces as established by government entities. Likewise, in cases where the government capacity is limited, the Concessionaire expected to assume an active role in the planning and follow-up of these processes, ensuring the proper implementation of the agreements and commitments arising from the consultation process.

#### 4.1.i External Communication and Grievance Mechanisms

##### 4.1.i.i External Communication

UVCP has established an external communications and grievance mechanism. Both processes are interconnected and are managed from the moment a communication is received through any of the channels designated for the Project.

##### 4.1.i.ii Community Grievance Mechanism

UCVP has a mechanism to receive and process inquiries, complaints, claims, and suggestions (“ICCS”) submitted by stakeholders. ICCS can be submitted via telephone, e-mail, the Operational Control Center (“OCC”), permanent offices (located in Buenaventura, Loboguerrero, and Buga), mobile customer service offices, the Project’s website, or verbally to the Concessionaire personnel. However, this mechanism will be updated to: i) include differentiated procedures to address the needs of vulnerable communities or populations, including women and ethnic groups; ii) ensure shorter response times for ICCS submitted by vulnerable communities and resettled individuals; iii) allow the receipt of confidential and anonymous complaints; iv) handle complaints related to gender-based violence and harassment separately and with

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<sup>11</sup> The ethnic communities consulted were: i) CCBC of the upper and middle Dagua river; ii) CCBC of Córdoba, San Cipriano, and Santa Helena; iii) CCBC of the lower Calima river basin; iv) CCBC of la Esperanza; v) CCBC of Citronela; (vi) CCBC of the upper Dagua-Pacifico river basin Cimarrones de Cisneros; vii) CCBC of la Caucana; viii) CCBC of Trapiche, Carrizales and Zabaletas; ix) CCBC of Loboguerrero; x) CCBC of Gamboa and; xi) CCBC of Guinea Alta, Guinea Baja, La Puerta, and La Victoria; and Zelandia, Juntas, and Cisneros Dagua districts.

<sup>12</sup> Emberá Chami Indigenous Community - Aizama and Nasa Kiwe Indigenous Community.

<sup>13</sup> Decree No. 2353 of 2019.



greatly diligence, while also providing the necessary protection to victims; and v) ensure that users of the mechanism are not subject to any retaliation for submitting an ICCS.

#### 4.1.i.iii Provisions for addressing vulnerable groups' grievances

The updated ICCS management mechanism will include protocols to capture and diligently manage complaints from vulnerable stakeholders, including women, the elderly, and ethnic communities.

#### 4.1.i.iv Ongoing Reporting to Affected Communities

The Concessionaire conducts periodic briefings with communities to share updates on Project progress, the implementation of E&S management programs, design modifications, and other relevant announcements. These meetings - coordinated with both ethnic and non-ethnic community leaders, as well as with local and regional authorities - are documented through meeting minutes.

This briefings are complemented by a media plan that leverages the Concessionaire's website, social media, billboards, bulletin boards, radio spots, magazines, informational brochures, and other media to disseminate information about the Project to the broader population.

## **4.2 Labor and Working Conditions**

The Concessionaire prioritizes the hiring of people from the Project's area of influence to mitigate the negative impacts associated with the presence of non-local personnel, promote local employment, and reduce the need for temporary housing.

While the number of indirect workers is expected to exceed 2,100 at peak construction (30% of whom will be women), the number of direct workers employed by the Concessionaire during this phase will be approximately 330. This figure is expected to decrease to around 230 during the operation and maintenance ("O&M") phase.

#### 4.2.a Working Conditions and Management of Worker Relationships

##### 4.2.a.i Human Resources Policies and Procedures

In order to attract, promote, and retain talent, as well as to foster the personal and professional development of its employees, UVPC has adopted Sacyr's human resources policy, adapted to the Colombian context. In addition, the Project has established a set of procedures that address matters related to conduct, gender equality, personnel selection, disciplinary processes, performance evaluations, training programs, compliance with labor rights, and the prevention of and response to workplace harassment.

##### 4.2.a.ii Working Conditions and Terms of Employment

In compliance of applicable regulations, the Concessionaire has formalized labor contracts with all its direct employees. These contracts guarantee the payment of benefits, severance and pension contributions, and document other labor rights.

#### 4.2.a.iii Workers' Organizations

Although, by constitutional mandate workers are free to associate, form unions or join existing unions, and exercise their right to collective bargaining, to date no unions have been registered among the Concessionaire's or the EPC contractor's workers.

#### 4.2.a.iv Non-discrimination and Equal Opportunity

The Client's Code of Ethics affirms respect for the right to equality and non-discrimination based on race, gender, ideology, national origin, language, religion, sexual orientation, age, disability, political or union affiliation, or any other personal or social condition of the personnel. Through its corporate diversity and inclusion policy, UVCP is committed to fostering an inclusive work environment that offers equal opportunities regardless of gender or functional, cultural, social, or generational characteristics.

#### 4.2.a.v Retrenchment

The Project has developed a retrenchment plan aligned with local labor regulations, which will be implemented as construction activities begin to wind down.

#### 4.2.a.vi Grievance Mechanism

Workers have access to several channels for reporting harassment and safety-related complaints. However, the Project will update the Internal Grievance Mechanism to expand available reporting channels, allow for anonymous complaints, ensure a clear and timely resolution process, and incorporate a victim-centered approach to GBV cases, ensuring both anonymity and confidentiality.

#### 4.2.b Protecting the Workforce

The Concessionaire does not employ child labor, nor does it use products or services produced through child labor. Likewise, it does not engage in forced or coercive labor and avoids hiring suppliers, contractors, or external collaborators who may be involved in such practices. To ensure compliance, UVCP conducts control and compliance audits of the working conditions of both its employees and contractors.

#### 4.2.c Occupational Health and Safety

Sacyr's Health and Safety Management System, based on ISO 45001:2018, aims to ensure a safe working environment by: i) eliminating or minimizing risks to personnel and other stakeholders exposed to health and safety hazards related to the Project's activities; ii) implementing, maintaining, and continuously improving the health and safety management system; and iii) ensuring compliance with the Occupational Health and Safety Policy. To achieve this, the Concessionaire has established processes for hazard identification, risk assessment, and control determination, in line with the hierarchy of controls. Similarly, high-risk activities are standardized and governed by written procedures that are readily accessible.

#### 4.2.d Provisions for People with Disabilities

Although UVCP does not practice discrimination against employees with disabilities, it has not yet incorporated people with disabilities into its workforce.

#### 4.2.e Workers Engaged by Third Parties

The Concessionaire's Integrated Manual for Contractors, Subcontractors, and Suppliers establishes the obligation for contractors and subcontractors to comply with the Project's environmental and social management requirements, including the implementation of an OHS system. In this regard, UVPC conducts periodic audits to verify the working conditions of both its own workers and those engaged by the EPC contractor.

#### 4.2.f Supply Chain

Sacyr's Code of Conduct includes a commitment to implementing practices that promote equal opportunity, non-discrimination, work-life balance, the eradication of child labor, and the elimination of forced labor. This commitment extends across the entire value chain through its Supply Chain Management Policy. In addition,, the Concession Procurement and Subcontracting Manual requires all suppliers to hold valid environmental licenses and certifications authorizing them to provide services or exploit resources, thereby ensuring compliance with environmental and social standards.

### **4.3 Resource Efficiency and Pollution Prevention**

#### 4.3.a Resource Efficiency

The Project has been implementing various measures to reuse pavement milling and to optimize the consumption of energy, water, and other resources (such as construction materials). To support his efforts, the Integrated Management Plan to Reduce Electricity Consumption monitors progress toward the achievement of established targets.

##### 4.3.a.i Greenhouse Gases

The main sources of greenhouse gas ("GHG") emissions during the construction and operation of the Project include fossil fuel combustion by heavy machinery, the use of asphalt and concrete plants, the use of explosives for excavations, and industrial processes such as cement manufacturing (scope 1). During the operation phase, the primary sources of emissions include maintenance vehicles, emergency power plants, and stationary equipment such as generators and ventilation systems. While GHG emissions are estimated to be less than 25,000 tons of CO<sub>2</sub> equivalent per year, the Concessionaire will conduct an annual GHG emissions inventory including scope 1 and 2.

##### 4.3.a.ii Water Consumption

During construction, water is used for activities such as concrete mixing, dust control, soil compaction, cleaning of machinery and work areas, and to mitigate environmental impacts. During the operation phase, water will be used for general services, facilities maintenance, irrigation of green areas, and other activities related to highway infrastructure.

The Project has applied for seven water concessions: six from surface sources and one from a groundwater source. As part of the environmental commitment contained in the EGAP, the Project will implement programs for the conservation and efficient use of water resources.

#### 4.3.b Pollution Prevention

The Project implements measures to prevent noise, dust, and vibration pollution. To this end, it uses low-emission equipment and acoustic barriers, has adopted daytime schedules for noisy activities, and conducts regular monitoring. For dust control, it performs frequent sprinkling, covers particulate matter, and has installed dust suppression systems in concrete mixers and asphalt plants. Regarding vibrations, activities are scheduled based on geotechnical studies and use construction techniques designed to minimize their impact on nearby structures and communities.

##### 4.3.b.i Waste

The Project generates inert solid waste (such as debris, excavation leftovers, domestic waste, and construction and demolition waste) and hazardous waste (including used oils, hydrocarbon-contaminated materials, chemical containers, and sludge from cleaning and maintenance activities). To minimize waste generation, the Project has adopted efficient planning practices, such as material reuse and debris. Hazardous waste is temporarily stored in designated areas, in labeled and protected containers, and its final disposal is carried out by authorized companies.

Wastewater includes that generated during tunnel excavation, which will be treated through sedimentation, flocculation, and degreasing before being discharge into the Dagua River and Los Indios Creek. Domestic wastewater will be managed by a certified company using portable sanitary units. Workshops will be equipped with grease traps to separate oils and surface sludge, which will then be treated by authorized waste managers.

##### 4.3.b.ii Hazardous Materials Management

The Project will handle hazardous materials such as oils, fuels, solvents, paints, lubricants and, when necessary, explosives for specific construction activities. These materials must be stored in resistant, airtight, and properly labeled containers, in accordance with local regulations, and separated based on their chemical compatibility. The Project will also establish designated storage areas that are properly ventilated and signposted, with access control and spill response kits. To minimize the risk of accidents and ensure compliance with national regulations, explosives will be managed under strict protocols for registration, transportation in authorized vehicles, storage in secure magazines, and surveillance.

##### 4.3.b.iii Pesticide Use and Management

The Project performs vector and plant control using Integrated Pest Management (“IPM”) practices that favor the use of non-chemical products and resort to pesticides (low toxicity, approved by the competent regulatory authorities) only when strictly necessary. Management measures include storing these products in ventilated and signposted areas, as well as training the personnel in charge of them. These actions will be documented in a vector management and plant control procedure.

### **4.4 Community Health, Safety and Security**

#### 4.4.a Community Health and Safety

Community risks include noise, dust, vibrations, traffic accidents, and emergencies. To mitigate this risks, the Concessionaire has installed road signage, implemented emission and noise control programs, and

delimited safe zones for pedestrians and cyclists. In addition, it has established a community education and training program to inform and train local communities on issues such as vector-borne disease prevention, communicable disease control, road safety, water and energy efficiency, and waste management.

Nevertheless, the Concessionaire will develop a Comprehensive Community Health and Safety Plan that to outline the preventive measures and strategies necessary to effectively manage these risks.

#### 4.4.a.i Infrastructure and Equipment Design and Safety

The design of the works includes specific measures to ensure road safety, including for vulnerable road users such as pedestrians and cyclists. To this end, crosswalks will be installed in both urban and rural areas, and measures such as speed controls, road signage to regulate traffic and prevent accidents, and physical barriers to limit unauthorized access to highways will be implemented.

#### 4.4.a.ii Hazardous Materials Management and Safety

Risks associated with hazardous materials management include fuel spills, explosions, fires, traffic accidents, vehicle rollovers, and contamination of soil or water bodies due to improper transport and handling. These risks are particularly critical during the mobilization of machinery and materials such as oils, fuels, and asphalt mixtures. To mitigate them, the Project uses specialized vehicles designed for the safe transport of hazardous materials, which are regularly inspected and maintained as required by national regulations. These vehicles are also equipped with safety features such as fire extinguishers, absorbent materials, and spill containment systems. Heavy machinery is transported exclusively in suitable vehicles, such as low bed trucks, in compliance with ANI provisions.

The hazardous materials management procedure will include specific provisions to ensure that transportation complies with both local legislation and applicable international standards.

#### 4.4.a.iii Ecosystem Services

The ecosystem services identified by the Project in the FUs requiring an environmental license include: (i) provisioning services, such as fresh water, construction materials, timber, biomass, fisheries, agriculture, and medicinal plants; (ii) regulating services, such as erosion control, carbon storage and sequestration, pollination, and water purification; (iii) supporting services, such as wildlife habitats and the conservation of genetic diversity; and (iv) cultural service, such as tourism and spiritual or religious values. The Project will develop the ecosystem services impact assessment in the EGAP areas and update the environmental management plans to include mitigation and compensation measures derived from this assessment.

#### 4.4.a.iv Community Exposure to Disease

The community has been historically exposed to vector-borne diseases such as dengue and malaria. The execution of the Project will introduce additional risks associated with the presence of temporary workers during the construction phase. To mitigate both two types of exposures, the Project routinely fumigates key locations (including service areas and nearby communities) and carries out awareness campaigns promoting the use of mosquito nets, the elimination of vector breeding sites (stagnant water), and improved hygiene practices, disease prevention, and relations with non-local personnel. These measures will be integrated into the Community Health and Safety Plan.

#### 4.4.a.v Emergency Preparedness and Response

Although it has already held sessions to disseminate the EPRP, the Concessionaire will involve local communities in conducting emergency drills and provide them with training on this topic. It is currently scheduling these sessions to ensure community participation in the planned activities.

#### 4.4.b Security Personnel

The Concessionaire has hired a specialized firm to manage and prevent security risks, through which it has implemented a comprehensive system that includes CCTV, video cameras, and geopositioning devices (“GPS”) in vehicles, ensuring continuous satellite monitoring. UVCP also holds a private security contract with a company accredited by national authorities. The only armed personnel are assigned to the Loboguerrero tollbooth and receive training in human rights, use of force, weapons handling, and the Code of Ethics. To date, no incidents affecting the Project or its personnel have been reported.

UVCP will develop a Security Management Plan that will address topics such as: the Project’s context; applicable policies and standards; criteria for verifying the selection of security contractors; the need for training in the use of force, human rights, and proportionality principles; protocols for incident reporting and investigation; coordination mechanisms with public security forces; and guidelines for community relations.

### 4.5 Land Acquisition and Involuntary Resettlement

#### 4.5.a General

To date, 531 properties that would be required for the development of the Project have been preliminarily identified.<sup>14</sup> Of these, 71 were acquired by the previous concessionaire in accordance with national regulations and are registered under ANI's name. There are no outstanding liabilities associated with these transactions. Even so, the UVPC estimates that a total of 786 Social Units (“SUs”), including residents and productive units, will have to be resettled.

The Concessionaire has an integrated land acquisition strategy that complies with Colombian legal requirements, ensuring compensation, monitoring, and socioeconomic support. As part of this process, it will update the Resettlement Action Plan (“RAP”) to include: i) monitoring of resettlement processes involving already-compensated Project Affected Persons (“PAPs”), addressing risks and applying corrective measures; ii) provisions for future resettlement, ensuring full reinstatement, security of tenure, and restoration of livelihoods; iii) an ex post evaluation by a qualified third party; iv) an update of procedures for the public space reclamation, ensuring consultation and proper notification of affected persons; and v) alignment of compensation practices with principles of equity and rights protection, with particular attention to vulnerable PAPs.<sup>15</sup>

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<sup>14</sup> This number will surely be adjusted as the activities foreseen in the Project's Property Management Plan progress.

<sup>15</sup> Vulnerability criteria include, but are not limited to, factors of: gender, age, literacy, physical or mental disability, poverty or economic deprivation, and dependence on single natural resources.

#### 4.5.a.i Project Design

The Concessionaire has considered modifications to the design of FUs 2, 3, 4, 5, 8, 9, 12, 13, 14, 15, 19, 20 and 21, which will help reduce the displacement of people.

#### 4.5.a.ii Compensation and Benefits for Displaced Persons

As required by Colombian regulations<sup>16</sup> and contractual obligations, the Concessionaire is developing an Economic Compensation Plan that determines compensation for lost assets through an appraisal to be performed by a third party. To this end, properties are appraised to determine their “new” value and then depreciated to establish their replacement value in the market, ensuring that the indemnity value is sufficient to acquire a property in equal or better condition than the affected one,<sup>17</sup> along with an additional amount to cover any related transfer expenses.

#### 4.5.a.iii Community Engagement

The Project has a Socio-Predial Management Support Plan to monitor resettled individuals, tailored to their specific needs. Nevertheless, as part of the RAP, the Concessionaire will develop a stakeholder engagement plan to consult and inform the implementation of the land acquisition, compensation, and resettlement processes. This plan will include provisions to ensure: i) the participation of women in consultation activities; ii) their access to land acquisition processes; and (iii) their access to the benefits and measures provided for in the RAP.

#### 4.5.a.iv Grievance Mechanism

Through the Customer Service Program and the community relations offices, the Project manages the ICCS related to land acquisition, compensation, and resettlement processes. Nevertheless, the UVCP will establish specific procedures to ensure timely attention and adequate response times, with priority given to PAPs, vulnerable communities, and individuals involved in these processes.

#### 4.5.a.v Resettlement and Livelihood Restoration Planning and Implementation

UVCP will update its RAP to incorporate compensation and resettlement measures, ensuring their application to all PAPs through: i) Livelihood Restoration Plans (“LRPs”); ii) a land acquisition and resettlement monitoring program, which will include independent quarterly monitoring of the RAPs and LRPs; and iii) an external post-resettlement audit.

#### 4.5.b Displacement

##### 4.5.b.i Physical Displacement

To date, 602 Resident Social Units (“RSUs”) have been identified for resettlement. As part of the updated RAP, the Concessionaire will conduct a socioeconomic and cultural assessment of all affected RSUs.

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<sup>16</sup> Law 1682 of 2013; Resolution 620 of 2008 and Resolution 898 of 2014 of the Instituto Geográfico Agustín Codazzi (“IGAC”); and Decree 1420 of 1998.

<sup>17</sup> IGAC Resolution No. 898 of 2014.

#### 4.5.b.ii Economic Displacement

To date, 414 Productive Social Units (“PSUs”) have been identified that will experience economic displacement as a result of the physical resettlement process. As part of the updated RAP, the Concessionaire will conduct a socioeconomic and cultural assessment of all affected PSUs to evaluate impacts and define appropriate compensation and livelihood restoration measures.

#### 4.5.c Private Sector Responsibilities Under Government-Managed Resettlement

The Concessionaire, acting as delegate of the State and on behalf of ANI, is responsible for the land acquisition, compensation, and resettlement activities required by the Project, always with ANI’s consent and approval. If land cannot be acquired through mutual agreement (either because the owner rejects the purchase offer or because, despite their willingness to sell it, legal impediments prevent a voluntary transaction), the lot is released through expropriation, in which the government assumes responsibility for the process and compensation.

### **4.6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

#### 4.6.a General

The Project traverses mostly modified habitats, with small remnants of scattered forest primarily associated with water bodies (gallery forests), which are under pressure from settlement expansion, cattle ranching, the introduction of invasive alien species, and the extractive activities in the region. The highway layout intercepts the following ecosystems: i) Tropical Rainforests of the Pacific, characterized by high biodiversity and considered strategic for conservation; ii) Aquatic ecosystems, including the Dagua River, streams, and wetlands, which may be affected by the road infrastructure; and iii) Modified ecosystems, where mosaics of crops, pastures, and urban areas predominate, reflecting significant habitat fragmentation.

#### 4.6.b Protection and Conservation of Biodiversity

The Project has Biodiversity Compensation Plans, a Biotic Component Compensation Plan, and a series of environmental compensations for the use and exploitation of natural resources, as required by regional and national environmental authorities. These plans establish the reference framework; calculate compensation based on the affected area and the types of impacted habitats and ecosystems; define the actions to be taken to offset the identified impacts; and establish monitoring and follow-up needs. The Environmental Management Plans also include technical guidelines for avoiding or managing impacts on biodiversity and ecosystem services (such as topsoil management, protection of wildlife, flora, and sensitive ecosystems, and restoration efforts in disturbed areas).

The Concessionaire will develop: i) a Biodiversity Action Plan (“BAP”) which will include strategies for the compensation and conservation of natural and critical habitats; and ii) a Biodiversity Management and Monitoring Plan, which will contain specific measures for fauna and flora protection, monitoring of fauna crossings, and adaptive management of the Project's impacts.



#### 4.6.b.i Modified Habitat

The area where the Project is located is dominated by vegetation formations with varying degrees of human intervention. Semi-natural cover, which includes remnants natural forest relicts, comprises approximately 53% of the area, while transformed cover (associated with agricultural, livestock, and infrastructure) represents the remaining 47%.

#### 4.6.b.ii Natural Habitat

The Concessionaire is in the process of quantifying and geospatially mapping potentially patches of natural or critical habitat that could be affected by the new Project footprint. This process includes the representative characterization of fauna and flora, as well as the calculation of basic indices for priority biodiversity values.

#### 4.6.b.iii Critical Habitat

Although the final determination of patches that may contain critical habitats is still underway, the Project's layout intercepts minor relicts of Tropical Dry Forest (Globally Threatened Ecosystem) and Inland Wetlands (Globally Protected Ecosystem), where the presence of biologically important species has been identified.<sup>18</sup> In this context, the BAP will incorporate specific biodiversity offset measures for these species, ensuring, through conservation and restoration strategies, a Net Biodiversity Gain ("NBG") that guarantees their long-term protection and regeneration.

#### 4.6.b.iv Legally Protected Areas and Internationally Recognized Areas

The Project is largely developed on an existing footprint, with operation, maintenance, and upgrade activities taking place across most of the corridor. New construction is limited and focuses on building a second lane in certain specific sections, upgrading of service areas, and improving intersections. More than 80% of the Project overlaps with the Pacific Forest Reserve, which, although not a protected area, is subject to environmental zoning that restricts certain land uses. FUs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 15, 16, 17, and 18 overlap with areas categorized by ANLA as Category A, where intervention must be minimized to preserve ecological processes. The remaining FUs are located in areas with Prior Zoning Decisions,<sup>19</sup> where Project activities are not expected to generate significant environmental impacts.

The Project also borders or overlaps with several protected areas in Colombia, including the National Protected Forest Reserve of the Escalerete and San Cipriano River Basin; the National Protected Forest Reserve of Río Dagua; the Cañón del Río Grande Soil Conservation District; and the Laguna de Sonso Regional Integrated Management District, which is also a RAMSAR site.<sup>20</sup> Although the Project area is surrounded by transformed, fragmented, and semi-natural vegetation, in certain sections it intercepts relicts of tropical dry forest and riparian forests, which are considered strategic ecosystems. In these areas, mitigation and compensation measures will be implemented, prioritizing biodiversity conservation and monitoring to minimize impacts on local flora and fauna.

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<sup>18</sup> Such as Pitaya (*Stenocereus humilis*), globally listed as endangered (EN), which is endemic to the Dagua Valley, Colombia.

<sup>19</sup> Areas where activities are allowed subject to an assessment that determines impacts and establishes mitigation measures.

<sup>20</sup> A wetland designated as internationally important under the Convention on Wetlands (known as the Ramsar Convention), an intergovernmental environmental treaty established in 1971 by UNESCO that provides the basis for national action and international cooperation with regard to wetland conservation and the wise and sustainable use of wetland resources.

#### 4.6.b.v Invasive Alien Species

The Project does not propose, nor does it plan to use invasive alien species.

#### 4.6.c Management of Ecosystem Services

The Project has conducted ecosystem services characterizations for the FUs that require an environmental license, which will be complemented through the BAP.

#### 4.6.d Sustainable Management of Living Natural Resources

The Concessionaire has made its best efforts to prevent adverse impacts on biodiversity and ecosystem services by applying the mitigation hierarchy and adopting strategies and programs to avoid biodiversity loss through its environmental management instruments (EIA and EGAP). These measures include, among others: i) minimization of impacts from surface clearing; ii) reduction of impacts from the removal and management of forests and species under national protection; iii) landscaping revegetation of altered sectors; iv) compensatory reforestation; v) rescue of associated flora and fauna; vi) flora management and forest harvesting; vii) implementation of wildlife crossings; and viii) compensation for biodiversity loss, forest harvesting, and the removal of protective and productive forest reserves.

In addition, and as part of the BAP, the Project will establish specific measures to ensure No Net Loss (“NNL”) of biodiversity in the case of impacts on natural habitats or a Net Biodiversity Gain (“NBG”) in the case of interventions in critical habitats.

#### 4.6.e Supply Chain

To the extent possible and subject to applicable limitations, the Concessionaire verifies that extraction or production of materials used in the Project is carried out responsibly and in accordance with Colombian biodiversity protection laws.

### **4.7 Indigenous Peoples**

#### 4.7.a General

In Colombia, the right to free, prior and informed consultation (“FPIC”) of ethnic groups is protected by the Political Constitution of 1991, and takes precedence over any administrative act issued by the legislator in office. The Directorate of the National Authority for Prior Consultation, under the Ministry of the Interior, is responsible for leading and supervising the fulfillment of this right.

#### 4.7.a.i Avoidance of Adverse Impacts

The impacts of the planned works on Indigenous populations were evaluated by those responsible for the consultation process and the communities themselves, in accordance with Colombian regulations. The analysis covered the following dimensions: social (including social structure, culture, and health); environmental (biodiversity, natural resources, air and water quality); economic (land ownership and use, food security, and local economy); and political and governance (autonomy, self-determination, participation, representation, and power relations). Based on this assessment, agreements were established to define compensation and mitigation measures for each identified adverse impact.

#### 4.7.a.ii Participation and Consent

The sixteen consultation processes complied with the provisions of Law 21 of 1991, Decree 1990 of 2019, and Constitutional Court Ruling T-025 of 2004, guaranteeing: i) the right of ethnic communities to participate in decision-making related to their territory, culture, and ways of life; ii) the right to give or withhold consent prior to the implementation of the Project; and iii) respect for the autonomy of their community decisions.

#### 4.7.b Circumstances Requiring Free, Prior, and Informed Consent

Under contract, the Concessionaire has no prior consultation processes with Indigenous groups pending or in progress. However, during the earlier stages of the Project, the previous concessionaire conducted two prior consultation processes with the Emberá Chami - Aizama<sup>21</sup> and Nasa Kiwe<sup>22</sup> Indigenous communities. The resulting agreements were closed and approved by both communities and the competent authorities at the time. These communities are located in the La Delfina district and form part of FU 7, where regular upgrade and maintenance activities are planned, including construction of the Cisneros II tollbooth.

At present, sixteen FPIC processes are in the follow-up stage, with eleven Community Councils of Black Communities ("CCBC"), distributed along the highway corridor. The process of determining the need for consultation, along with the coordination, preparation, pre-consultation, and consultation stages, were largely carried out before the concession was awarded. However, a new consultation request arose during Project implementation, which was declared admissible and whose agreements have been notarized. Of the sixteen consultations, six were managed by ANI during the concession structuring phase. The reached with each CCBC were incorporated into the concession contract and are now the responsibility of the Concessionaire to implement. The remaining nine consultations were undertaken by INVIAS and other concessionaires prior to the structuring of this concession. The commitments resulting from these earlier consultations are being managed by the Concessionaire as pending social obligations.

##### 4.7.b.i Impacts on Lands and Natural Resources Subject to Traditional Ownership or Under Customary Use

The Project crosses areas with diverse land ownership and tenure structures, including territories with traditional ownership and customary use, particularly in rural and Afro-descendant communities. In the El Trapiche rural settlement, most of the land is smallholdings used for subsistence farming and agricultural activities, while in the Zabaletas rural settlement, most of the land is inherited, passed down from generation to generation without formal titles, with 60% owned without titles, 20% privately owned, and 20% leased. In the Pacífico Cimarrón Community Council district, collective land ownership limits private property, which has led to tensions over the sale of land to people outside the council.

The Project will affect approximately 2 properties under the traditional property or customary use regime, generating: i) restrictions on access to land and natural resources; ii) impacts on agriculture, livestock, and harvesting of forest products; and iii) losses of land without formal deeds, which could make compensation processes more difficult. To mitigate these impacts, the Project includes consultation processes with affected communities, ensuring adequate compensation and resettlement, guaranteeing

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<sup>21</sup> Protocolization: November 2, 2007; closure of the process: October 21, 2015.

<sup>22</sup> Protocolization: November 2, 2007; closure of the process: September 21, 2017.

access to compensatory land in the event of displacement of land-dependent communities, and monitoring the socioeconomic impact of highway construction and operation on these communities, with the goal of respecting customary tenure rights and promoting sustainability in the management of natural resources.

#### 4.7.b.ii Relocation of Indigenous Peoples from Lands and Natural Resources Subject to Traditional Ownership or Under Customary Use

During a Prior Consultation process carried out by the previous concessionaire,<sup>23</sup> agreements were reached to resettle 67 affected families from the Community Council of the Black Community of Loboguerrero. Due to contractual restructuring and the assignment of responsibilities in the concession contract, the implementation of these agreements was left to UVCP. Thus, to address the impacts generated on the living conditions and livelihood of the families, the Concessionaire will undertake a definitive individual resettlement, an alternative that was selected by the affected families. In addition, under the external grievance mechanism, a procedure will be established to assess residual risks and vulnerabilities of Project-affected people impacted by previous resettlements.

#### 4.7.b.iii Critical Cultural Heritage

FPIC processes included a cultural impact assessment. The Concessionaire does not foresee the use of cultural heritage for commercial purposes.

#### 4.7.c Mitigation and Development Benefits

A total of 620 agreements were registered with the black communities, including collective and individual agreements. The agreements are already being implemented and are on schedule.

#### 4.7.d Private Sector Responsibilities Where Government is Responsible for Managing Indigenous Peoples Issues

The Ministry of the Interior, through the Directorate of Prior Consultation, leads and coordinates the entire Prior Consultation process. The Concessionaire is responsible for ensuring the planning, execution, and follow-up of each agreement, as required by Colombian and international standards.

### 4.8 Cultural Heritage

Although the Project will neither affect critical cultural heritage nor involve the removal of reproducible or irreproducible cultural heritage, the Concessionaire has hired archaeological experts to oversee compliance with the corresponding regulations.

Although the archaeological potential of the area is classified as medium-low, the Concessionaire has developed an approved Chance Finds Protocol, which is part of the Preventive Archaeology Program. This protocol establishes measures for handling any unexpected finds, such as suspension of activities in the affected area, notification of the relevant authorities, expert evaluation of the finds, and implementation of management actions, such as in situ preservation or recording and relocation.

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<sup>23</sup> On September 20, 2020.

## **5. Local Access of Project Documentation**

The documentation relating to the Project can be accessed at the following link:  
<https://caminodelpacifico.com/>