



# Due Diligence 2024

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CONEXIONES QUE INSPIRAN

# Human Rights Due Diligence

## Principles of Professor John Ruggie

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Due Diligence is the **capacity of the company to be responsible for the negative impacts caused by its activities**. It means doing the right thing before, during and after the development of its projects and involves identifying weaknesses to correct them, and risks to manage and mitigate them.

To comply with this process, ISA and its **companies adhere to the United Nations framework "Protect, respect and remedy"**, in accordance with the Principles of **Professor John Ruggie**.





## What does it mean for companies to implement and promote due diligence?

- The process of due diligence implies evaluating the context of Human Rights before launching a new business or investment.
- Whenever possible, it will identify the individuals possibly affected, catalog the norms and other relevant aspects on the Human Rights issue, and measure the consequences that the project, work or activity and corresponding business relations may have on the Human Rights of the assessed communities.
- It means that companies will not tolerate that any of its stakeholders, either directly or as an accomplice, should act in violation of Human Rights. Furthermore, it also means to reject any payment to fund illegal armed groups, contribute to terrorism, or launder money.
- Communicate and train its workers and suppliers not to offer, promise or request, either directly or indirectly, illicit payments or other undue advantages resulting from developing actions inherent to its businesses in a specific area.
- In each of its businesses, companies must directly implement risk management measures and ensure that their suppliers do the same.



## How does ISA verify and monitor compliance of its commitments to Human Rights?

- ISA verifies and monitors Human Rights compliance through the use of the Ethics Line, and keeps a record of the complaints addressed, which shall be reported on a quarterly basis to the Ethics Committee.
- ISA has a Socio-political Risks and Social Risks Analysis Group to manage potential situations of Human Rights violations.
- ISA communicates its progress through the Progress Communication (COP) System and provides accountability of its Human Rights efforts in the Sustainability Report prepared every year. It also reports progress made to the United Nations Global Compact.

# Management instruments for the promotion and respect of human rights

 **VOLUNTARY PRINCIPLES**  
(International Alert)

 **RUGGIE PRINCIPLES**

 **NATIONAL POLICY ON HUMAN RIGHTS AND BUSINESS**  
(Plan Nacional de Acción de Empresas y Derechos Humanos 2020/2022)

 **Human Rights Guidelines of ISA and its companies** (2024)



**The scope of the declaration is for all stakeholders**



# Human Rights Guidelines of ISA and its companies



We will devote special attention to **those rights directly related to our activities and operations**

- Right to life.
- Right to personal integrity.
- Right to equality and non-discrimination.
- Rights of Indigenous peoples.
- Right to work in decent, favorable, equitable and adequate conditions.
- Right to freedom of association and collective bargaining.
- Right to health.
- Right to personal freedom.
- Right to information.
- Right to privacy and protection of personal data.
- Right to participation.
- Right to a healthy environment.
- Right to property.
- Rejection of child labor and forced labor.



**The scope of the declaration is for all stakeholders**



# Human Rights Due diligence



Human Rights due diligence process is embedded in our existing approach to risk management with a special focus on potential human rights risks to people. It is integrated into our company's regularly running formal processes, including:

**Risk Management:** To preserve and maintain an excellent management of our business resources, and ensuring business continuity, ISA has a comprehensive management approach against possible risks and opportunities. To this end, ISA has implemented a process of identification, analysis, evaluation, monitoring, and communication of the risks to which we it is exposed. The aim is to minimize the impact on financial resources and reputation as well as to take advantage of the opportunities that may arise.

**Risk Policy:** To declare the corporate decisions leading Integrated Risk Management, through which it seeks to generate and protect the value of ISA and its companies, the integrity of enterprise resources, the continuity and sustainability of business.

**Compliance Program:** Corporate Government applies the business philosophy, policies, rules, means, practices and processes through which the company is managed, operated and controlled. Our goals are corporate efficiency, boosting growth, and building investor confidence in domestic and foreign contexts, as well as managing our business with a sustainability approach in a responsible, transparent, and ethical manner.

**Code of Ethics and Conduct:** It is a set of rules that define the standards of behavior expected by the organization and guide ISA and its companies' actions as part of the Ecopetrol Group, as well as the actions of all the recipients of the Code under the ethical principles of integrity, responsibility, respect, and commitment to life. Having this instrument in place entails a corporate purpose and a personal commitment, which will be honored in a responsible manner. The sum of all the individual ethical actions helps build a prestigious image, in a culture based on superior principles of behavior.

**Suppliers Assessment:** The supplier performance evaluation is mandatory for:

- Contracts that pose a problem or that violate ethics, the anti-fraud code, or the corporate guideline on respect for and promotion of human rights.
- Delivery orders from contracts managed centrally from the Corporate Procurement Department.
- Contracts with a term of more than one year, at the end of each year. Contracts with a term of less than one year, upon completion.
- The contracts that contemplate characteristics deemed critical for occupational health and environmental aspects.

**Contractors audits:** sustainability audits were carried out with the support of ICONTEC, which resulted in support plans for suppliers.

**Contractors Assessment:** This initiative is designed to contractors with which we engage are equally committed to respect human rights aligned with the health and safety of their employees, clients, and the communities in which they operate.

**ISA Code of Conduct for Suppliers:** this document is aligned with our higher purpose: CONNECTIONS THAT INSPIRE. Its maxims are the main expression of the behaviors, actions, and beliefs of ISA and its companies. It is supplemented by the Code of Ethics and Conduct, the anti-corruption and anti-bribery guide, the Code of Good Corporate Governance, and the Commitments with Stakeholders. With these tools, the ISA ratifies its commitment to comply with and promote environmental, social, and corporate governance criteria across its value chain, in all its operations, and urges suppliers to comply with and promote them.

**Grievance Mechanism:** We have created different consultation and reporting channels so that all stakeholders can consult or report on compliance or breach within this action framework. These open communication channels enable us to obtain valuable feedback to evaluate the effectiveness of implemented mitigation actions based on identified risks to people.

- [Ethic line](#)
- [APP ISA Ethic line](#)
- Ethic committee
- Compliance officer
- Communication mechanisms with project liaisons and authorities

# Protect, respect and remedy



## PROTECT



## RESPECT



## REMEDY



### FRAMEWORK

- Support and strengthen the Nation so that it plays its role with respect to Human Rights

- Companies must respect Human Rights
- Companies must refrain from violating human rights of third parties and face the negative consequences they have on them

- Have access to victims, legal and non-legal means of remediation



### ACTIONS

- Participate in the Mining-Energy Committee for Human Rights
- Carry out social actions to strengthen base organizations to be guarantors of their rights.
- Promotion of the declaration on Human Rights and Business
- Due Diligence in human rights training

- Human Rights Guidelines of ISA and its Companies
- Due diligence
- Addresses inquiries and provides information on the impacts and management measures
- Pedagogy with employees and suppliers
- Management indicators

- Ethics Line
- Ethics Committee
- Claims and complaints mechanisms



### RESULTS

- Desarrollo y Paz Programs that promote the management and respect of Human Rights
- Conexión Desarrollo program and Conexión Jaguar program
- Promotion actions on stakeholders

- Zero events: Human Rights infringement due to business development


- Zero events: denounced or complained claims and complaints mechanisms
- **As no event occurred**, there were **no remediation action**
- The **promotion and mitigation actions** carried out by the company made it possible to **avoid** events of violation of human rights in 2024

# Due diligence map

Each project in its construction and operation stage **carries out a periodic review** with the managers and project managers, which are **periodically monitored** by the presidency committees of each subsidiary.

These is a annual review, but each mounth every project had an assesment

Over the past three years, more than 30 projects—both under construction and in operation—have been systematically monitored and supervised, with active involvement in nearly all related activities



	Colombia	Peru	Chile	Panama
<b>Vulnerable groups</b>				
Local community	X	X	X	X
Afro community				
Indigenous populations	X	X	X	X
Suppliers	X	X	X	
Employees	X			
<b>Mitigation actions</b>				
Social management	X	X	X	
Social complementary programs	X	X	X	X
Training	X	X	X	X
Declaration of Human Rights	X	X	X	X
Human Rights Diagnostics	X	X	X	X
Contractual clauses	X	X	X	X
Social management under construction	X	X	X	X
Alternatives for the location of lots and access to the lines	X		X	
preventive archaeological	X	X	X	
Forest compensation plan	X	X		
Anticipated engagement with security actors	X			
<b>Mechanisms</b>				
Complaints and claims	X	X	X	X
Social risk workshop	X	X	X	X
Service office	X	X	X	X
Risk analysis in expansion plans	X	X	X	X
Compliance officer	X	X	X	X
Communication mechanisms with project liaisons and authorities	X	X	X	X

**X: Identified risk**

# Due diligence map

Each **new project** has **due diligence**.

In 2024, more than **6 new projects** were analyzed in **ISA and companies**

	Colombia	Chile
<b>Vulnerable groups</b>		
Local community	X	X
Afro community		
Indigenous populations	X	X
Suppliers	X	X
Employees	X	
<b>Mitigation actions</b>		
Social management	X	X
Social complementary programs	X	X
Training	X	X
Declaration of Human Rights	X	X
Human Rights Diagnostics	X	X
Contractual clauses	X	X
Social management under construction	X	X
Alternatives for the location of lots and access to the lines	X	X
preventive archaeological	X	X
Forest compensation plan	X	
Anticipated engagement with security actors	X	
<b>Mechanisms</b>		
Complaints and claims	X	X
Social risk workshop	X	X
Service office	X	X
Risk analysis in expansion plans	X	X
Compliance officer	X	X
Communication mechanisms with project liaisons and authorities	X	X

**X: Identified risk**

# Due diligence map

Each new project has due diligence, in addition each project in its construction and operation stage carries out a periodic review with the managers and project managers, which are periodically monitored by the presidency committees of each subsidiary.

Risks and impacts	Colombia	Chile
<b>Environmental</b>	<ul style="list-style-type: none"> <li>Increase in biotic offset</li> <li>Monitoring of fauna and flora</li> <li>Relocation of flora and fauna</li> <li>Increase in flora and fauna rescue values.</li> <li>Non-compliance with legal environmental obligations</li> </ul>	<ul style="list-style-type: none"> <li>Water, soil and air pollution.</li> </ul>
<b>Property: detriment and impact from the use of the land</b>	<ul style="list-style-type: none"> <li>Increase in areas to be compensated.</li> </ul>	
<b>Impact on the archeological and cultural heritage</b>	<ul style="list-style-type: none"> <li>Intervention of territory with cultural use by ethnic communities</li> <li>Archaeological findings.</li> </ul>	<ul style="list-style-type: none"> <li>Archaeological findings</li> <li>Indigenous consultations.</li> </ul>
<b>Labor (occupational health and safety)</b>	<ul style="list-style-type: none"> <li>Improper management of labor rights.</li> </ul>	
<b>Fraud and corruption</b>	<ul style="list-style-type: none"> <li>Alteration of information</li> <li>Disclosure of confidential information</li> <li>Conflicts of interest</li> <li>Operational or financial noncompliance.</li> </ul>	<ul style="list-style-type: none"> <li>Potential for fraud targeting officials facilitating permits at the bid stage.</li> <li>Money laundry</li> </ul>
<b>Public order (citizen security, theft, damage, physical aggression, extortion)</b>	<ul style="list-style-type: none"> <li>Social opposition to the project</li> </ul>	<ul style="list-style-type: none"> <li>Social opposition to the project.</li> </ul>
<b>Social</b>	<ul style="list-style-type: none"> <li>Families to be resettled</li> <li>Opposition from landowners to the project</li> <li>Presence of ethnic communities/Collective territories.</li> <li>Increase in prior consultations</li> </ul>	<ul style="list-style-type: none"> <li>Impact on viability due to political proselytizing</li> <li>Presence of ethnic communities/Collective territories</li> <li>Relocation of communities.</li> </ul>
<b>Suppliers</b>		<ul style="list-style-type: none"> <li>No timely payments to subcontractors</li> <li>Lack of payments to cover labor requirements in subcontractors</li> <li>Non-compliance with legal and occupational health and safety (OHS) obligations by suppliers in their dealings with contractors.</li> </ul>

Salient Human Rights	Potentially Impacted Stakeholders	Main Functions Leading Mitigation Actions	Related Activities
Not support child labor, forced labor or labor performed by coercion	<ul style="list-style-type: none"> <li>• Employees</li> <li>• Suppliers</li> <li>• Communities</li> <li>• Clients</li> </ul>	<ul style="list-style-type: none"> <li>• Human Resources</li> <li>• Social Impact</li> <li>• Legal</li> <li>• Procurement</li> </ul>	<ul style="list-style-type: none"> <li>• Through its management in the sustainability strategy, it promotes actions that contribute avoiding the same</li> <li>• Matrix of occupational hazards</li> <li>• Monthly monitoring of contracts and their workers</li> <li>• Careful selection process</li> <li>• Ethic code/ Ethic line and comittee</li> </ul>
Recognizes a dignified and timely compensation to employees, suppliers and contractors	<ul style="list-style-type: none"> <li>• Employees</li> <li>• Suppliers</li> </ul>	<ul style="list-style-type: none"> <li>• Human Resources</li> <li>• Legal</li> <li>• Procurement</li> </ul>	<ul style="list-style-type: none"> <li>• ISA never pay wages below the legal minimum salary in force in the country of operation, and promotes this practice in its supply chain</li> </ul>
Respects the right of workers to be represented by unions or other forms of labor association	<ul style="list-style-type: none"> <li>• Employees</li> <li>• Suppliers</li> <li>• Clients</li> </ul>	<ul style="list-style-type: none"> <li>• Human Resources</li> <li>• Social Impact</li> <li>• Legal</li> <li>• Procurement</li> </ul>	<ul style="list-style-type: none"> <li>• ISA considered legitimate representatives of workers, and participate in negotiations within the framework of the law</li> <li>• Ethic code</li> </ul>
Ensure the health and safety of its employees in work activities	<ul style="list-style-type: none"> <li>• Employees</li> <li>• Suppliers</li> <li>• Clients</li> </ul>	<ul style="list-style-type: none"> <li>• Health &amp; Safety</li> <li>• Procurement</li> <li>• Human Resources</li> <li>• Sustainability</li> </ul>	<ul style="list-style-type: none"> <li>• Applies OHSAS 18001 ISO45001 standards</li> <li>• Ensures that its suppliers act accordingly under the framework of their responsibilities</li> <li>• Ethic code</li> </ul>
Promotes gender equality in its activities.	<ul style="list-style-type: none"> <li>• Employees</li> <li>• Suppliers</li> <li>• Communities</li> </ul>	<ul style="list-style-type: none"> <li>• Human Resources</li> <li>• Social Impact</li> <li>• Legal</li> <li>• Sustainability</li> </ul>	<ul style="list-style-type: none"> <li>• Ethic code/ Ethic line and comittee</li> <li>• Diversity committee</li> <li>• Work coexistence committee</li> </ul>

Salient Human Rights	Potentially Impacted Stakeholders	Main Functions Leading Mitigation Actions	Related Activities
<p>Procures the understanding of the culture, religion, rules and values of ethnic groups; thus, during the stage of design, construction and operation of projects</p>	<ul style="list-style-type: none"> <li>• Employees</li> <li>• Suppliers</li> <li>• Communities</li> </ul>	<ul style="list-style-type: none"> <li>• Public Affairs</li> <li>• Legal</li> <li>• Social Impact</li> <li>• Sustainability</li> </ul>	<ul style="list-style-type: none"> <li>• ISA addresses inquiries and provides information on the impacts and management measures through meetings with these groups, with the aim of building a positive and mutually beneficial relationship</li> <li>• Ethic code</li> </ul>
<p>Promotes fair treatment regarding access to employment and proper working conditions</p>	<ul style="list-style-type: none"> <li>• Employees</li> <li>• Suppliers</li> </ul>	<ul style="list-style-type: none"> <li>• Human Resources</li> <li>• Legal</li> <li>• Procurement</li> </ul>	<ul style="list-style-type: none"> <li>• ISA does not tolerate any discriminatory treatment by condition of sex, race, color, nationality, social origin, age, marital status, sexual orientation, ideology, political opinions, religion or any other personal, physical or social condition of its employees, suppliers or contractors</li> <li>• Ethic code</li> <li>• Code of conduct for suppliers</li> <li>• Diversity committee</li> <li>• Chilean Standard NCh 3262:2011 &amp; Equipares, Gender Equality Management System, maintaining the Silver Seal</li> </ul>
<p>We recognize the interdependence between environmental protection and human rights. As a third-generation law, the protection of the environment and natural resources, the fight against climate change and the contribution to sustainable socio-economic development are strategic factors in the planning, operation, and development of our activities</p>	<ul style="list-style-type: none"> <li>• Employees</li> <li>• Suppliers</li> <li>• Communities</li> <li>• Environment</li> </ul>	<ul style="list-style-type: none"> <li>• Public Affairs</li> <li>• Legal</li> <li>• Social Impact</li> <li>• Environmental impact</li> <li>• Sustainability</li> </ul>	<ul style="list-style-type: none"> <li>• This is complemented by our commitment to set specific goals and deadlines to contribute to the reduction of CO<sub>2</sub> emissions to the planet, in order to contribute to the achievement of the global warming objectives, in line with the Paris Agreement and the achievement of the UN Sustainable Development Goals.</li> <li>• This commitment is extended to all partners, suppliers, and other stakeholders with whom we have business relationships; through contractual documents, the Code of Ethics, and the Code of Ethics and Conduct for Suppliers</li> </ul>

# Human rights risk matrix for the Electricity Sector



Extreme	5	<ul style="list-style-type: none"> <li>Impacts on the rights of children and adolescents throughout the business value chain.</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li>Affecting the physical integrity of workers and managers.</li> </ul>	<ul style="list-style-type: none"> <li>Companies violate the due process of the communities (ethnic and non-ethnic) and institutions where they have a presence and operational interests.</li> <li>Violation of safe and decent working conditions throughout the value chain.</li> </ul>	<ul style="list-style-type: none"> <li>Infringement of the overall health of the people in the area of influence.</li> </ul>	
Major	4	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li>Affecting the integrity and physical safety of personnel and business stakeholders (suppliers, contractors, partners, etc.) and external groups.</li> <li>Violence and/or harassment (in any form) to workers who are part of the supply chain and stakeholders.</li> <li>Violation of due process of third parties.</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	
Moderate	3	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li>Infringement of employment opportunities and/or possibilities for people in the area of influence.</li> <li>Infringement of the right to privacy, due use and management of information and data of clients, users and collaborators.</li> <li>Infringement of the right to association and collective bargaining in the value chain.</li> <li>Impact on the right to health and life with dignity of users in a special constitutional protection condition due to the undue suspension of arrears and bad procedures.</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li>Violation of the right to work under conditions of equity, equality, and diversity.</li> </ul>	<ul style="list-style-type: none"> <li>Violation of the right to a healthy environment.</li> </ul>	
Minor	2	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li>Violation of the right to access information and due process.</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	
Low	1	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	
			1	2	3	4	5
			Rarely	Improbable	Possible	Probable	Frequent

# Human Rights Risk Matrix for the Electricity Sector



Human Rights risk scenarios	Human Rights	Causes	HR Associated	Stakeholder involved	Controls measures
The company impacts (-) natural resources (water, air and soil) with its activities.	Violation of the right to a healthy environment.	<ul style="list-style-type: none"> <li>Alteration of the characteristics of natural resources.</li> <li>Decrease in the quality and availability of resources.</li> </ul>	<ul style="list-style-type: none"> <li>Right to a healthy environment.</li> <li>Right to an adequate standard of living.</li> </ul>	<ul style="list-style-type: none"> <li>Communities</li> <li>Collaborators</li> <li>Authorities</li> <li>Customers / Users</li> </ul>	<ul style="list-style-type: none"> <li>Environmental Management Plans &amp; Systems</li> <li>Investment and Compensation plans, voluntary and complementary actions</li> <li>Environmental Regulatory Compliance</li> <li>Follow-up and monitoring of environmental criteria</li> <li>New technologies and optimization of production processes</li> <li>Inclusion of environmental issues in the relationship building.</li> <li>Traceability on prior consultation</li> <li>Coordination and training to technical areas and related contractors</li> <li>Identification of the most critical suppliers in this matter</li> </ul>
Actions to stop the company's operations.	Affecting the integrity and physical safety of personnel and business stakeholders (suppliers, contractors, partners, etc.) and external groups.	<ul style="list-style-type: none"> <li>Protests or demonstrations.</li> <li>Inadequate service delivery.</li> <li>Excessive use of public force - private security.</li> </ul>	<ul style="list-style-type: none"> <li>Right to life.</li> <li>Right to security.</li> <li>Right to personal integrity.</li> <li>Right to mobility and freedom of transit.</li> </ul>	<ul style="list-style-type: none"> <li>Suppliers / Contractors</li> <li>Collaborators</li> <li>Partners / Shareholders</li> <li>Customers / Users</li> <li>Communities</li> </ul>	<ul style="list-style-type: none"> <li>Relationship and crisis management protocol</li> <li>Early warning scheme</li> <li>Business continuity plans with ESG and HR focus</li> <li>Relationship scheme with government entities</li> <li>Guidelines for relationship with public entities</li> <li>Human rights program and monitoring</li> <li>Damage repair and restoration</li> </ul>
Inadequate relations with stakeholders (ethnic and non-ethnic) and institutions.	Companies violate the due process of the communities (ethnic and non-ethnic) and institutions where they have a presence and operational interests.	<ul style="list-style-type: none"> <li>Disinformation on the scope of the project or operation.</li> <li>Failure to comply with agreements made between the parties.</li> <li>Unfounded claims and demands to the company.</li> <li>Absence of formal agreements.</li> <li>Discrimination in the productive and relationship context.</li> <li>Bribes, political contributions, charitable sponsorships and gifts to officials.</li> </ul>	<ul style="list-style-type: none"> <li>Right to due process.</li> <li>Right of access to information.</li> <li>Right to nondiscrimination.</li> </ul>	<ul style="list-style-type: none"> <li>Communities</li> <li>Institutions</li> <li>Customers / Users</li> </ul>	<ul style="list-style-type: none"> <li>Dissemination of citizen service mechanisms</li> <li>Training in customer service and customer management</li> <li>Stakeholder engagement protocols</li> <li>Social management programs</li> <li>Risk analysis/Characterization of communities</li> <li>Communication channels and permanent working groups/Socialization meetings</li> <li>Ethics and Compliance/Attention to PQR/Ethics line socialization</li> <li>Transparency law</li> <li>Training of internal collaborators and education for external communities</li> </ul>

# Human Rights Risk Matrix for the Electricity Sector



Human Rights risk scenarios	Human Rights	Causes	HR Associated	Stakeholder involved	Controls measures
Deficit access to socioeconomic means (work, health, education, etc.) of the inhabitants of the areas of influence.	Infringement of employment opportunities and/or possibilities for people in the area of influence.	<ul style="list-style-type: none"> <li>Labor market monopoly.</li> <li>Competition with other industries.</li> <li>Lack of government presence.</li> <li>Inadequate management of impacts caused by projects and operations.</li> </ul>	<ul style="list-style-type: none"> <li>Right to work.</li> <li>Right to free development.</li> </ul>	<ul style="list-style-type: none"> <li>Communities</li> <li>Suppliers / Contractors</li> </ul>	<ul style="list-style-type: none"> <li>Employment plans and other social actions</li> <li>Policies to prioritize local labor</li> <li>Required labor training agreements</li> <li>Public employment service and public databases</li> <li>Internal database review</li> <li>Development and training on technical skills</li> <li>Development of productive projects and other livelihood alternatives</li> </ul>
Armed conflict and social conditions in certain regions.	Infringement of the overall health of the people in the area of influence.	<ul style="list-style-type: none"> <li>Lack of state presence and control.</li> <li>Traditional characteristics of the populations.</li> <li>*Extra-legal lucrative demands.</li> </ul>	<ul style="list-style-type: none"> <li>Right to an adequate standard of living.</li> <li>Right to social security.</li> <li>Right to work.</li> <li>Right to life.</li> </ul>	<ul style="list-style-type: none"> <li>Communities</li> <li>Suppliers / Contractors</li> </ul>	<ul style="list-style-type: none"> <li>Impact baseline construction and impact management</li> <li>Monitoring indicators</li> <li>Social actions in the health and safety line</li> </ul>
Armed conflict and social conditions in certain regions.	Impact on the physical integrity of workers and managers.	<ul style="list-style-type: none"> <li>Lack of state presence and control.</li> <li>Traditional characteristics of the populations.</li> <li>Extra-legal lucrative demands.</li> </ul>	<ul style="list-style-type: none"> <li>Right to life.</li> <li>Right to respect for their physical, psychological and moral integrity.</li> </ul>	<ul style="list-style-type: none"> <li>Collaborators</li> <li>Suppliers / Contractors</li> </ul>	<ul style="list-style-type: none"> <li>Security risk analysis</li> <li>Safety protocols in high-risk areas</li> <li>Periodic reports</li> <li>Agreements with state entities</li> <li>Geolocation and technological tools</li> </ul>
Inadequate human talent management in the companies.	Violation of the right to work under conditions of equity, equality and diversity.	<ul style="list-style-type: none"> <li>Lack of corporate controls for the management of human talent.</li> <li>Historically inherited biases.</li> </ul>	<ul style="list-style-type: none"> <li>Right to work.</li> <li>Right to equality.</li> <li>Right to nondiscrimination.</li> </ul>	<ul style="list-style-type: none"> <li>Collaborators</li> <li>Suppliers / Contractors</li> </ul>	<ul style="list-style-type: none"> <li>Ensuring peer lists and job profiles with diversity opportunities</li> <li>Transparent contracting processes</li> <li>Training on diversity, equity and inclusion issues</li> <li>Adjustment of policies and practices on diversity, equity and inclusion</li> <li>Environment dynamization (e.g.: Universities)</li> <li>Alliances to provide training and dynamization opportunities</li> <li>Alliances also to strengthen inclusion in the labor field</li> <li>Sustainability embedded in contracts</li> <li>Inclusive infrastructure development</li> </ul>

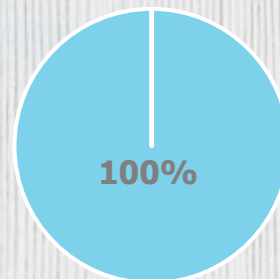
# Human Rights Risk Matrix for the Electricity Sector



Human Rights risk scenarios	Human Rights	Causes	HR Associated	Stakeholder involved	Controls measures
Deficient management of complaints, claims and user information.	Infringement of the right to privacy, due use and management of information and data of clients, users and collaborators.	<ul style="list-style-type: none"> <li>Collapse and lack of attention in the PQRS (requests, complains, claims and suggestions) communication channels.</li> <li>Impediments in the provision of a quality service due to deficiencies in the information provided to the target stakeholders.</li> </ul>	<ul style="list-style-type: none"> <li>Right of access to information.</li> <li>Right to due process.</li> </ul>	<ul style="list-style-type: none"> <li>Customers / Users</li> <li>Collaborators</li> </ul>	<ul style="list-style-type: none"> <li>Policies, management frameworks and tools for information security and cybersecurity</li> <li>Information and Data Security Protocols</li> <li>Information security training for employees</li> <li>Permanent monitoring of the handling of private information and operation of channels</li> <li>Training for data protection programs</li> <li>Data protection extended to the value chain (e.g. contact center)</li> <li>KPIs (Management – Quality)</li> </ul>
Inadequate Human Rights management by the supply chain.	Violence and/or harassment (in any form) to workers who are part of the supply chain and stakeholders.	<ul style="list-style-type: none"> <li>Disinformation on the responsibilities of the actors associated with Human Rights.</li> <li>Lack of controls and administrative measures to manage human rights.</li> <li>Processes, decisions and/or functions that affect the integrity of personnel.</li> </ul>	<ul style="list-style-type: none"> <li>Right to work.</li> <li>Right to free development.</li> <li>Right to physical and mental health.</li> </ul>	<ul style="list-style-type: none"> <li>Suppliers / Contractors</li> <li>Communities</li> <li>Collaborators</li> <li>Partners / Shareholders</li> <li>Customers / Users</li> </ul>	<ul style="list-style-type: none"> <li>Channel available with variables on HR issues</li> <li>Contractual requirement requiring compliance with HR</li> <li>Remediation procedures in HR</li> </ul>
Lack of human rights remediation mechanisms (valid for the company and its supply chain).	Violation of the due process rights of third parties.	<ul style="list-style-type: none"> <li>Disinformation and lack of interest in the responsibilities of the actors associated with human rights.</li> <li>Lack of controls and administrative measures to manage human rights.</li> </ul>	<ul style="list-style-type: none"> <li>Right to safe and dignified working conditions.</li> <li>Right to life and personal integrity.</li> </ul>	<ul style="list-style-type: none"> <li>Suppliers / Contractors</li> <li>Collaborators</li> <li>Partners / Shareholders</li> <li>Customers / Users</li> </ul>	<ul style="list-style-type: none"> <li>Channel available with variables on HR issues</li> <li>Relationship and crisis management protocol</li> <li>Early warning scheme</li> <li>Business continuity plans with an ESG and HR focus</li> <li>Relationship scheme with governmental entities</li> <li>Relationship guidelines with public entities</li> </ul>
Inadequate management of occupational health and safety conditions.	Violation of safe and decent working conditions throughout the value chain.	<ul style="list-style-type: none"> <li>Lack of administrative controls.</li> </ul>	<ul style="list-style-type: none"> <li>Right to safe and dignified working conditions.</li> <li>Right to life and personal integrity.</li> </ul>	<ul style="list-style-type: none"> <li>Collaborators</li> <li>Suppliers / Contractors*</li> </ul>	<ul style="list-style-type: none"> <li>Include clauses in contractors' bidding documents</li> <li>Contract monitoring and auditing</li> <li>Internal and supplier support</li> <li>Codes of conduct for contractors</li> <li>Monitoring of the grievance mechanism for the contractor workforce</li> <li>Coexistence committee</li> <li>Well-being and organizational climate</li> </ul>

# Human Rights Assessment

## Own Operations



% of total assessed in last three years

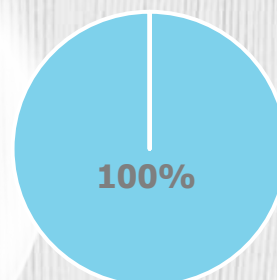


% of total assessed where risks have been identified

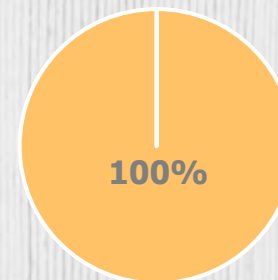


% of risk with mitigation actions taken

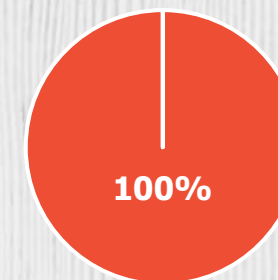
## Contractors and Tier I Suppliers



% of total assessed in last three years



% of total assessed where risks have been identified



% of risk with mitigation actions taken



**22** Labor unions in ISA and its companies

**2** Collective Pacts at ISA and its Companies

Unionized workers  
**30.4% of ISA and its companies' workforce**

**1549**

**454** Workers affiliated with Collective Agreements  
**8.9% of ISA and its companies' workforce**

Workers benefiting from the extension of Collective Bargaining Agreements  
**26.7% of ISA and its companies' workforce.**

**1360**

**24** Collective Agreements at ISA and its Companies

## Freedom of association & right to collective bargaining

Country	Labor unions	Affiliated workers	Beneficiaries by extension
Colombia	5	668	225
Perú	2	128	0
Chile	4	257	0
Brazil	11	496	1135

# Forced labor & child labor

Country	Operations analyzed	Operations and suppliers that may pose a significant risk of non-compliance	Measures adopted
Colombia	5		ISA, ISA INTERCOLOMBIA, ISA TRANSELCA, ISA REP, ISA CTEEP, and ISA INTERCHILE have not identified any risks of child labor or forced labor in their own operations or those outsourced. No cases of forced labor were identified in any owned or contractor-operated facilities during construction or operational processes.
Perú	81	All operations related to energy transportation are subject to HSE (Health, Safety, and Environment) controls and are monitored through their respective risk matrices. This ensures the control and oversight of labor situations that could involve forced labor.	Procurement processes in different countries include contractual clauses that require compliance with the laws of both the product's country of origin and the country of delivery. These clauses explicitly prohibit child and forced labor and require adherence to ISA's Code of Ethics.
Chile	0		
Brazil	0	<p>ISA and its affiliated companies have a Code of Ethics and Conduct applicable to all suppliers, which includes a specific section dedicated to the respect, promotion, and monitoring of human rights management.</p> <p>Contractors undergo an induction course to reinforce this topic, and contract execution is monitored to verify compliance with contractual clauses.</p>	ISA INTERCOLOMBIA is a signatory of the UN Global Compact and has implemented measures to ensure and monitor labor rights in full respect of human rights. Employment contracts for direct workers comply with Colombian labor laws and international standards. Similarly, contractual requirements for suppliers are aligned with Colombian labor legislation and declared standards, and compliance is monitored accordingly..

# Discrimination

## Cases of discrimination and corrective actions taken

	ISA		ISA INTERCOLOMBIA		ISA TRANSELCA		ISA BOLIVIA		ISA REP		ISA INTERCHILE	
	Women	Men	Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
Number of cases	0	0	0	0	0	0	0	0	0	0	0	0
Corrective measures and actions												
If cases have occurred, indicate their status and the actions taken with regard to the following: i. case evaluated by the organization; ii. implementation of ongoing remediation plans; iii. remediation plans, the results of which have been implemented through routine internal management and review processes; iv. case no longer subject to actions.												

	ISA CTEEP		XM		ISA INTERVIAL		INTERNEXA		COSTERA	
	Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
Number of cases	0	0	1	0	0	1	0	0	0	0
Corrective measures and actions			Yes			Warning to the offender				
If cases have occurred, indicate their status and the actions taken with regard to the following: i. case evaluated by the organization; ii. implementation of ongoing remediation plans; iii. remediation plans, the results of which have been implemented through routine internal management and review processes; iv. case no longer subject to actions.			iii. remediation plans, the results of which have been implemented through routine internal management and review processes;			iii. remediation plans, the results of which have been implemented through routine internal management and review processes;				

# Migrant workers

NATIONALITY	ISA		ISA INTERCOLOMBIA		ISA TRANSELCA		ISA BOLIVIA		ISA REP		ISA INTERCHILE		ISA CTEEP	
	# de empleados	# de empleados de posiciones en nivel 1 y 2	# de empleados	# de empleados de posiciones en nivel 1 y 2	# de empleados	# de empleados de posiciones en nivel 1 y 2	# de empleados	# de empleados de posiciones en nivel 1 y 2	# de empleados	# de empleados de posiciones en nivel 1 y 2	# de empleados	# de empleados de posiciones en nivel 1 y 2	# de empleados	# de empleados de posiciones en nivel 1 y 2
Argentina	1	1	0	0	0	0	0	0	0	0	1	0	2	1
Bolivia	0	0	1	0	0	0	28	2	0	0	0	0	1	0
Brasil	2	1	0	0	0	0	0	0	0	0	0	0	1620	7
Chile	2	2	0	0	0	0	0	0	0	0	87	9	1	0
Canadá	0	0	0	0	0	0	0	0	0	0	0	0	1	0
Colombia	308	32	813	28	217	12	0	0	9	5	14	5	3	1
Cuba	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Ecuador	0	0	0	0	0	0	0	0	0	0	0	0	0	0
España	0	0	0	0	0	0	0	0	0	0	1	1	0	0
Honduras	1	0	0	0	0	0	0	0	0	0	0	0	0	0
Japón	0	0	0	0	0	0	0	0	0	0	0	0	1	0
Paraguay	0	0	0	0	0	0	0	0	0	0	0	0	1	0
Perú	1	1	0	0	0	0	0	0	464	22	0	0	0	0
Venezuela	0	0	1	0	1	0	0	0	2	0	16	0	1	0

NATIONALITY	XM		INTEIA		INTERNEXA		ISA INTERVIAL		COSTERA		TOTAL	
	# de empleados	# de empleados de posiciones en nivel 1 y 2	# de empleados	# de empleados de posiciones en nivel 1 y 2	# de empleados	# de empleados de posiciones en nivel 1 y 2	# de empleados	# de empleados de posiciones en nivel 1 y 2	# de empleados	# de empleados de posiciones en nivel 1 y 2	# de empleados	# de empleados de posiciones en nivel 1 y 2
Argentina	0	0	0	0	0	0	0	0	0	0	4	2
Bolivia	0	0	0	0	0	0	0	0	0	0	30	2
Brasil	0	0	0	0	0	0	1	0	0	0	1623	8
Chile	0	0	0	0	1	1	328	30	0	0	419	42
Canadá	0	0	0	0	0	0	1	0	0	0	2	0
Colombia	394	19	146	6	289	29	6	2	259	6	2458	145
Cuba	0	0	0	0	1	0	0	0	0	0	1	0
Ecuador	0	0	0	0	1	0	0	0	0	0	1	0
España	0	0	0	0	0	0	0	0	0	0	1	1
Honduras	0	0	0	0	0	0	0	0	0	0	1	0
Japón	0	0	0	0	0	0	0	0	0	0	1	0
Paraguay	0	0	0	0	0	0	0	0	0	0	1	0
Perú	0	0	0	0	51	3	1	0	1	0	518	26
Venezuela	1	0	2	0	3	0	14	1	0	0	41	1
											5101	227

Within its various subsidiaries, ISA employs individuals who have migrated from their countries of origin and have been successfully integrated into the organization, regardless of their nationality. As of today, our workforce includes professionals from Venezuela, Honduras, Paraguay, Canada, Cuba, Spain, Ecuador, and Japan—nations where ISA does not currently maintain operational presence. This reflects our commitment to fostering a diverse and inclusive work environment that values talent beyond borders.

Migrant workers, as part of the organization's direct workforce, are explicitly considered in the human rights risk assessment. Their migrant status is systematically analyzed due to potential specific vulnerabilities.



*isa*

CONEXIONES QUE INSPIRAN