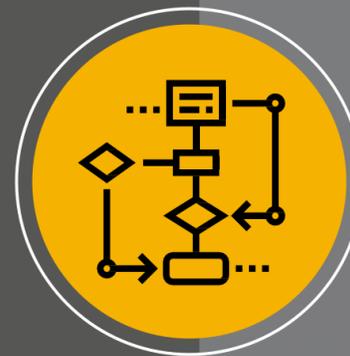


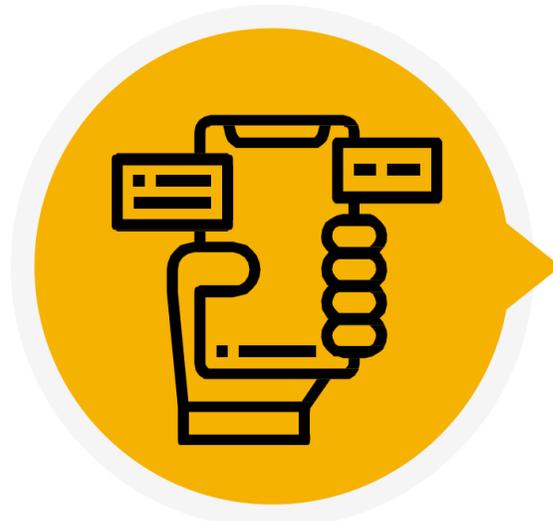
# Procedure for formulating complaints

COMMITTEE OF LABOR COEXISTENCE (CLC)



Empresa de concesiones del GRUPO ARGOS





# 1. | ESTABLISH COMPLAIN

People interested in making a complaint or concern about harassment or work coexistence may do so via email to the address [convivencia@odinsa.com](mailto:convivencia@odinsa.com)



- The maximum period available to file a complaint is 6 months after the events occurred.
- No complaints will be received anonymously or verbally.



## 2. | COMPLAIN RECEPTION

The member of the Labor Coexistence Committee (CLC) in charge of receiving possible complaints by email, will inform the rest of the Committee about the receipt and **will contact the person who sent it within a maximum period of 5 working days**, to deepen the information and the available evidence. The CLC President will decide if an extraordinary meeting is required or if it can be attended at the next regular meeting.



- The collaborator who filed the complaint will be informed by email, what will be the course of the complaint and on what date it will be addressed.

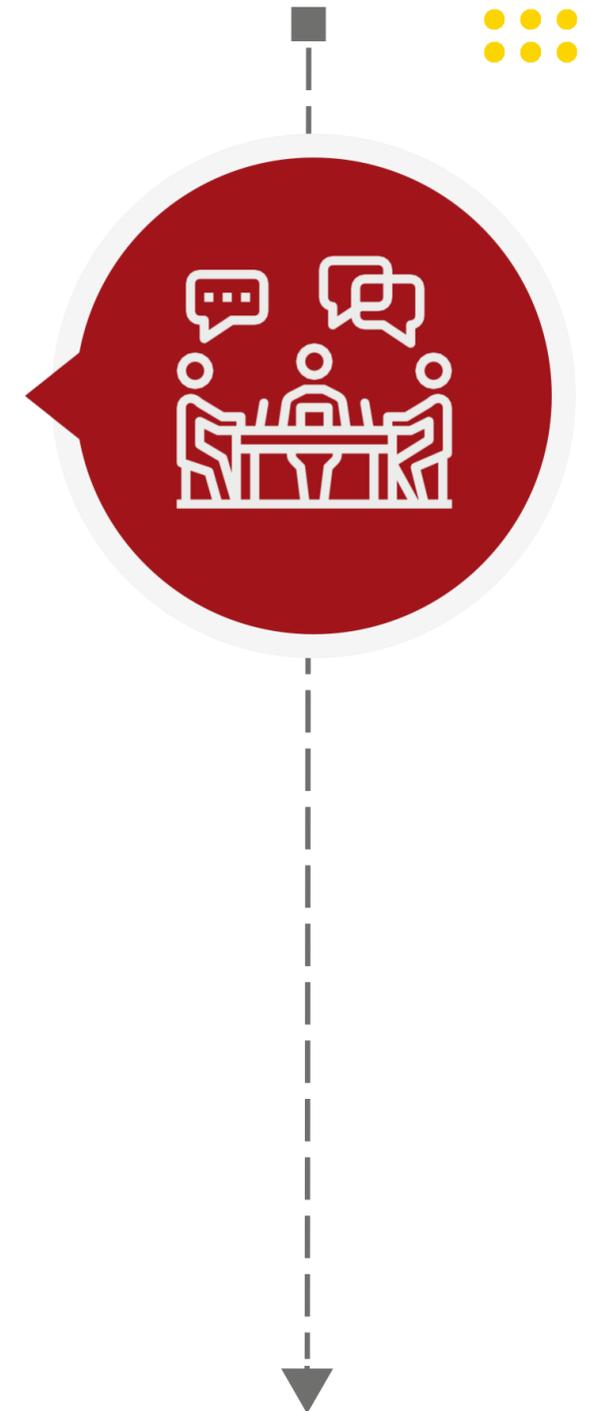


### 3. REVIEW IN CLC SESSION

Evaluate the complaint, and review if it may constitute workplace harassment conduct. Then determine the relevance of this and if necessary **activate the investigation process** of alleged workplace harassment.



- To determine if the investigation process that may constitute workplace harassment behavior should be activated, the CLC must take into account the information contained in Law 1010 of 2006 on Workplace Harassment.
- If the Labor Coexistence Committee determines, in its review of the complaint, it does NOT constitute workplace harassment behavior, and the opening of an investigation process is not required, it must inform the employee by email, arguing the decision taken.
- And if behaviors that go against the Code of Conduct are identified, the Transparency Line will be activated.

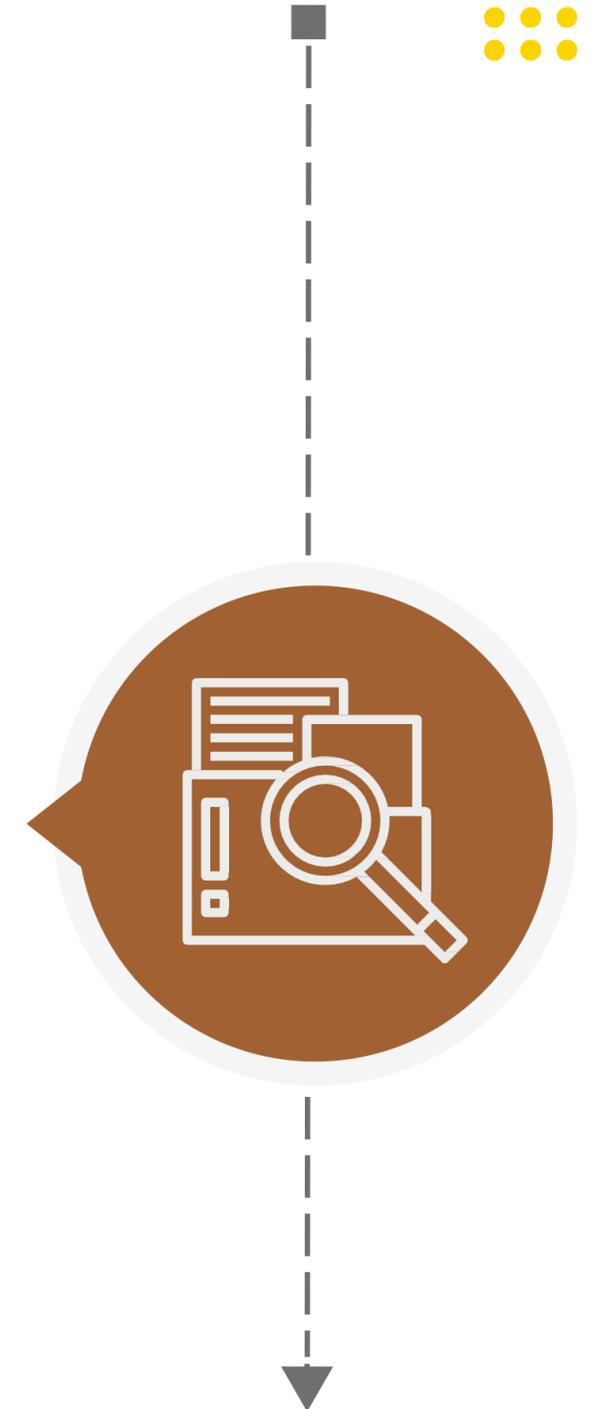


# 4. INVESTIGATION

The **Labor Coexistence Committee** will carry out the investigation to determine the appropriate actions based on the evidence collected.

## WHAT SHOULD BE TAKEN INTO ACCOUNT IN THE INVESTIGATION?

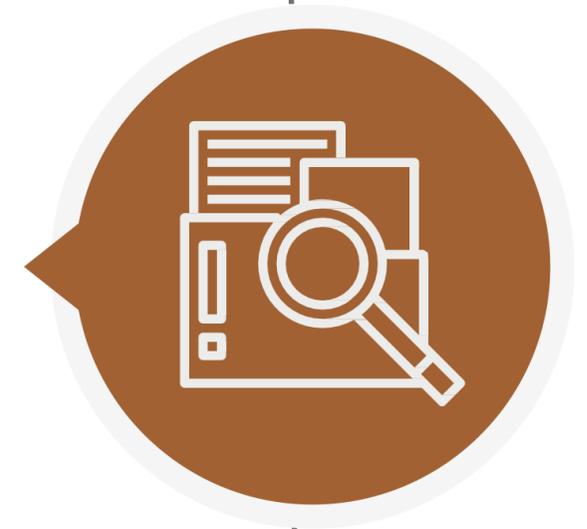
- Validate if the evidence collected is included within the conduct of workplace harassment.
- Listen to the parties involved individually about the facts that gave rise to the complaint, beginning with the person filing the complaint and followed by the accused, informing each of the parties of their summons in advance.
- Listen to the parties involved jointly about the facts that gave rise to the complaint.
- Request testimonies from the other collaborators of the company in the cases so defined and from the witnesses of the facts.
- Hold meetings in order to create a space for dialogue between the parties involved, promoting mutual commitments to reach an effective solution to disputes.
- Request technical support or expertise from professionals in the field of investigation to help advance the process. Without disclosing the facts of the investigation, and with the aim of verifying procedures, protocols, or technical concepts that are not known to the members of the Committee and that are essential for the investigation.

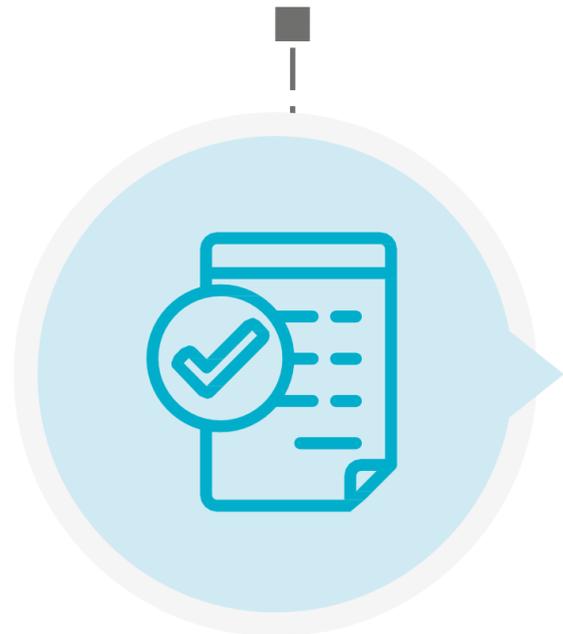


## 4. INVESTIGATION



- In the event that the complaint involves any of the CLC members, they will not be able to intervene in the investigation of the case and will be disqualified from belonging to the Labor Coexistence Committee for the next 6 months.
- Once the complaint is filed, the Committee has 20 business days to investigate. If more time is required due to being a complex case, a maximum of 5 additional business days will be available, leaving a record of the need for this time and the due justification.



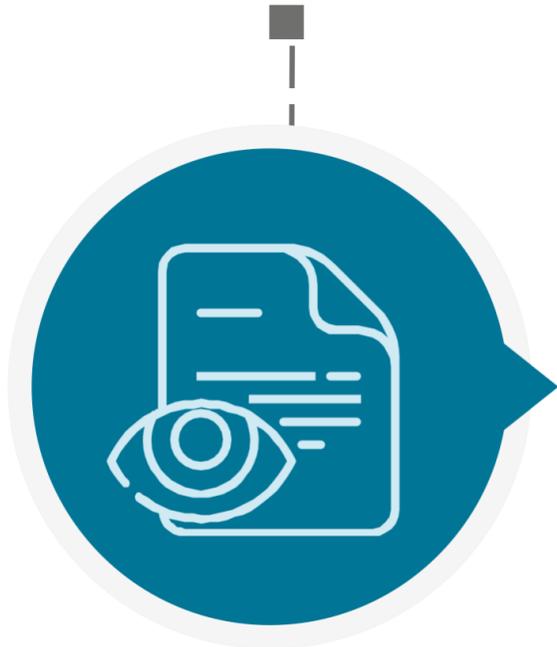


## 5. IMPROVEMENT PLAN

After completing the investigation process and in accordance with the review of the facts, **recommendations will be given** and an improvement plan will be jointly defined.



- Formulate an improvement plan agreed between the parties, to build, renew and promote work coexistence, guaranteeing in all cases the principle of confidentiality.
- Make recommendations for the intervening parties to both the affected party and the alleged implicated person, or for both in writing, and with clear commitments subject to verification. These recommended actions will be focused on improving Labor Coexistence between the parties.
- Activate the disciplinary process, in accordance with what is defined in the Internal Work Regulations, for events in which the result of the investigation shows a disciplinary offense on the part of any of the participants in this investigation process.
- Notify both parties of the failure of the investigation result in a personalized way and in writing via email.

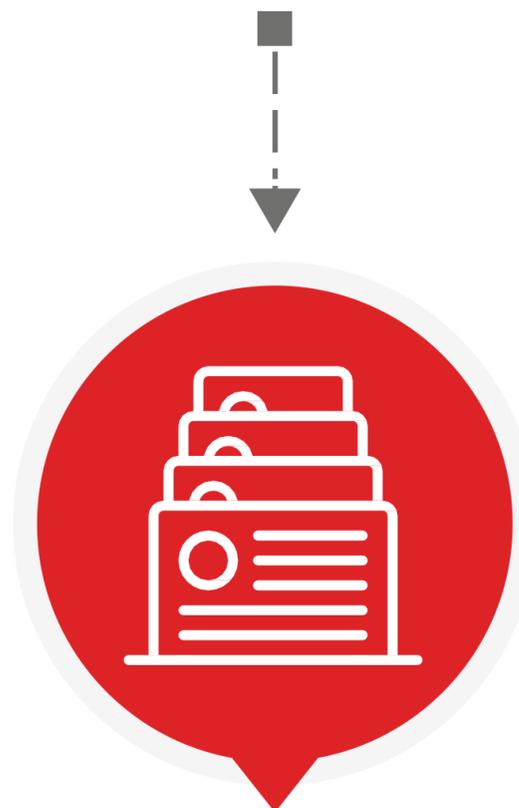


## 6. FOLLOW-UP

The CLC will monitor the commitments made in the improvement plan and the recommendations made to the parties involved in the complaint, verifying their compliance in accordance with the agreement.



- In those cases in which an agreement is not reached between the parties, a breach of the improvement plan is identified or the behavior persists, the Coexistence Committee will inform the Vice Presidency of Human and Administrative Talent about the situation. The CLC will close the case, and the employee may file the complaint with the Labor Inspector or with the competent Judge.



## 7. | DOCUMENTATION

All documentation related to the formulation of **complaints**, concerns and the attention of cases will be digitally archived in a site with exclusive access for the members of the Committee. In the event of physical information being produced, it will be archived in a site with exclusive access for CLC members.



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