

OHS Policy & Programs

2025



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Explanatory note: This document is a compilation and translation of the “Manual SGSST” which will be available in its original Spanish version at <https://www.porvenir.com.co>

1. INTRODUCTION

The Pension and Severance Fund Management Company PORVENIR S.A., hereinafter PORVENIR S.A., in compliance with the provisions of Law 1562 of 2012, Decree 1072 of 2015, and current regulations, has structured the Occupational Health and Safety Management System (SG-SST), which aims to structure joint action between the employer and workers in the application of Occupational Health and Safety (OHS) measures through the continuous improvement of working conditions and the work environment, and the effective control of hazards and risks in the workplace.

To this purpose, PORVENIR S.A. will address the prevention of occupational injuries and illnesses and the protection and promotion of workers' health through the implementation of a logical, step-by-step method based on the PDCA cycle (Plan, Do, Check, and Act) and including policy, organization, planning, implementation, evaluation, auditing, and improvement actions.

The coordinated development of these elements will enable the SG-SST's objectives to be met.

The SG-SST will be characterized by its adaptability to the size and characteristics of PORVENIR S.A., focusing on the identification and control of hazards and risks associated with its activity.

The management system framework is described in the following stages:

- Policy
- Organization
- Planning
- Implementation
- Evaluation
- Audit
- Improvement

2. LEGAL MATRIX

The integrity of workers' lives and health is a matter of public concern, involving both the government and private individuals (Law 9/79).

The legal framework is provided by constitutional guidelines, international ILO conventions, general provisions of the Substantive Labor Code, and is also regulated by the Substantive Labor Code in Colombia.

3. OHS POLICY

PORVENIR S.A. PENSION AND SEVERANCE FUND MANAGEMENT COMPANY is part of the AVAL Business Group. It is responsible for consolidating and managing the pension future of its members and administers their savings according to criteria of profitability, security, and transparency. This commitment is backed by an excellent team of professionals who are constantly growing and developing. For this reason, it considers the ongoing development of Occupational Health and Safety activities to be one of its fundamental purposes, enabling it to preserve the health of this team of professionals.

LA SOCIEDAD ADMINISTRADORA DE FONDOS DE PENSIONES Y CESANTIAS PORVENIR S.A. is responsible for directing its efforts towards providing its employees with the working environment, equipment, materials, and facilities, as well as the highest standards of well-being, safety, and comprehensive protection. It is also responsible for providing the financial resources required for the development of its Occupational Health and Safety Management System.

We respect and comply with all current legal guidelines on Occupational Health and Safety, as determined by the Colombian government, whose basic purpose is the physical, mental, and social protection of all employees, with a commitment to meeting the following objectives:

- Identify hazards, assess and evaluate risks, and establish the appropriate controls.
- Protect the safety and health of all employees through the continuous improvement of the Occupational Health and Safety Management System in the company.
- Comply with current national regulations applicable to occupational risks.
- Continuously develop OHS activities that preserve the health of its employees.
- Reduce the occurrence of workplace accidents and occupational illnesses compared to previous years through monitoring systems and accident and occupational illness prevention programs.

PORVENIR S.A. PENSION AND SEVERANCE FUND MANAGEMENT COMPANY considers one of its objectives to be the ongoing development of Occupational Health and Safety activities with the preservation of the health of its employees and the protection of material resources, in order to achieve the best benefits in terms of productivity, efficiency, and effectiveness in its daily activities. To achieve this goal, a healthy and safe working environment must be created and maintained, protecting our employees and users of our services.

All employees of LA SOCIEDAD ADMINISTRADORA DE FONDOS DE PENSIONES Y CESANTIAS PORVENIR S.A., visitors, contractors, and suppliers must accept their responsibility to comply with the requirements established in the Occupational Health and Safety Management System, achieve the objectives set, and create an awareness and culture of self-protection and protection of colleagues.

We will act with the conviction of preserving natural resources and promoting environmental conservation, ensuring that waste conditions and management do not

contaminate the environment in accordance with the provisions issued by regulatory agencies.

To achieve this goal, we must create and maintain a healthy and safe working environment, protecting our employees, visitors, contractors, suppliers, and service users, and striving to optimize safety and comfort levels at work to promote the productivity of our human talent.

ALEJANDRO GOMEZ VILLEGAS

Legal Representative.

Updated: January 13, 2025.

3.1 MECHANISMS FOR CONSULTATION AND PARTICIPATION OF WORKERS:

PORVENIR S.A. must ensure the adoption of effective measures that guarantee the participation of all workers and their representatives on the Joint Committee or Occupational Health and Safety Watchdog in the implementation of the policy, and that the latter function and have the necessary time and other resources, in accordance with the applicable regulations in force.

Likewise, the employer must inform workers and/or contractors, their representatives on the Joint Committee or the Occupational Health and Safety Watchdog, as appropriate, in accordance with current regulations. Likewise, the employer must inform workers and/or contractors, their representatives on the Joint Committee or the Occupational Health and Safety Watchdog, as appropriate in accordance with current regulations, about the development of all stages of the Occupational Health and Safety Management System (SG-SST) and must also evaluate the recommendations made by them for the improvement of the SG-SST. The employer must ensure the training of workers in occupational safety and health aspects in accordance with the characteristics of the company, the identification of hazards, the assessment and evaluation of risks related to their work, including provisions relating to emergency situations, within the working hours of direct workers or in the performance of the service provided by contractors.

3.1 QUANTITATIVE GOALS AND PRIORITIZATION AND INTEGRATION OF ACTION PLANS:

In line with the Occupational Health and Safety Policy, a matrix of objectives and targets has been established to enable strategic planning of the occupational health and safety management system.

This matrix defines measurement indicators that enable monitoring of compliance with the objectives and targets set. This monitoring is carried out every six months with the aim of identifying action plans for improvement where necessary.

The matrix is reviewed annually to ensure that it is in line with the objectives and targets set by the company.

POLICY GUIDELINE	OBJECTIVES	GOALS	INDICATORS
Preserve the health of its workers.	Implementation of the occupational health and safety management system	Documented Information Aligned with the Standard	Published and socialized
Comply with current national regulations applicable to occupational risks.	Compliance with the company's legal matrix	Comply with the provisions of Law 1562 of 2012 and Decree 1072 of 2015	Published and socialized
Identify hazards, evaluate and assess risks, and establish the respective controls.	Hazard identification and risk evaluation and assessment matrix, GTC 45 v.2012 methodology	Have the Hazard matrices for each of the workplaces	The Hazard Identification Matrices of all offices and headquarters in the country updated
Protect the safety and health of all workers through continuous improvement of the company's Occupational Health and Safety Management System.	Evaluation of the Management System in SG - SST - Audit plan and indicator management	Measure the effectiveness, efficiency, and efficacy of the SG - SST	Conduct at least one audit per year of the SG SST

3.2 ESTABLISHES PRIORITIZATION AND ACTION PLANS

According to health diagnosis reports and hazard identification and risk assessment, epidemiological surveillance programs will be defined in this same system, along with documented information that will enable the planning of activities associated with the program and will monitor, define the specific resources for each activity, follow up and monitor the cases included in the program, and measure the indicators of disease incidence and prevalence, coverage, compliance, and impact with the aim of analyzing trends and establishing action plans for improvement.

As part of its health prevention and promotion programs, PORVENIR S.A. will carry out the following activities:

- Prevention campaigns against alcoholism, drug addiction, and smoking.
- Identify health risks through consultation with health entities in the area where work is being carried out, with the aim of establishing action plans for the implementation of control measures.
- Immunization activities (vaccination) against diseases specific to the region, in accordance with the identified risks.
- Immunization (vaccination) activities for diseases specific to the region in accordance with the identified risks.

Periodic evaluation of the management program will be carried out using indicators to analyze trends, propose new strategies or action plans, or adjust program activities.

3.3 ENDORSEMENT BY THE HIGHEST-LEVEL DECISION-MAKING BODY

The Legal Representative must define, sign, and disclose the company's Occupational Health and Safety Policy through a written document. The policy must provide a reference framework for setting and reviewing OHS objectives.

4. OHS PROGRAMS

4.1 OHS RISK AND HAZARD ASSESSMENTS AND PROGRESS EVALUATION AGAINST HEALTH AND SAFETY TARGETS.

PORVENIR S.A. is governed by the provisions of GTC 45 version 2012 for the procedure of hazard identification, risk assessment, and control with the aim of controlling them and defining priorities in their management.

The hazard identification and risk assessment methodology allows for the participation of workers and stakeholders and the prioritization of risks to establish intervention measures with the following hierarchy scheme:

- **Elimination of the hazard/risk:** Redesign of processes or equipment to eliminate or reduce risks.
- **Substitution:** Replacing a raw material with a less hazardous one or replacing a high-risk process with a lower risk one.
- **Engineering controls:** Adopting technical measures to control the hazard/risk at its source, the purpose of which is associated with the control of OSH risks.
- **Administrative Controls:** Implementation of signage, warning systems, demarcation of risk areas or circulation and storage areas, implementation of warning systems, design and implementation of safety procedures for certain risk processes or activities, access controls to risk areas, safety inspections, checklists, work permits, among others.
- **Personal Protective Equipment:** When certain hazards/risks cannot be fully controlled by the above measures, the employer must provide its workers with the appropriate equipment in accordance with their activities.

The above control measures defined for each risk will form part of the preventive medicine and occupational health, hygiene, and industrial safety programs.

PORVENIR S.A. will monitor and periodically measure the effectiveness of risk control measures, in accordance with the identification of hazards and risk control defined in the company's various hazard matrices.

4.2 INTEGRATION OF ACTIONS TO PREPARE FOR AND RESPOND TO EMERGENCY SITUATIONS.

- **Emergency Response Plan (ERP):** The ERP is designed according to the updated characteristics and conditions of each facility, considering site-specific processes, regular occupants, and routine activities. It establishes the actions to be taken in response to emergencies identified through risk analysis by the Safety and Emergency Committee. The plan applies to all company personnel and covers emergencies that may occur during normal operations, projects, or non-routine events. It defines the organizational structure, formation of response teams, coordination with external support, and resources required. In addition, it provides specific response protocols for different threats.
- **Emergency Committee:** The Emergency Committee is responsible for continuously updating the ERP, incorporating risk analysis, resource management, coordination with external agencies, contact directories, staff training, task assignments, training records, and effective communication of the plan.
- **Emergency Drills:** At least once a year, emergency drills are carried out to test the PORVENIR facility's response capabilities. Typically simulating an emergency, these exercises evaluate established procedures, brigade coordination, and integration of available resources in critical situations.

4.3 INTERNAL INSPECTIONS.

Occupational Health and Safety Management, for which there will be a documented procedure called INTERNAL AUDITS, which will describe the activities to be carried out to control the system on an annual basis. This situation may vary at the direct request of Senior Management or a competent body.

At the end of each internal audit, the results will be recorded in a written report, which will contain, among other aspects, the activities carried out, the positive aspects of OHS management, and opportunities for improvement.

The audits will cover the evaluation of at least the following aspects:

- a) Compliance with the OSH policy.
- b) Evaluation of worker participation.
- c) Development of responsibility and accountability.
- d) Worker competence and training in OSH.
- e) Documented information on the OSH policy.
- f) How OSH is communicated to workers and its effectiveness.
- g) Planning, development, and implementation of the OSHMS.
- h) Change management.
- i) Emergency prevention, preparedness, and response.

- j) Consideration of OSH in new acquisitions.
- k) The scope and application of OSH in suppliers.
- l) The monitoring and measurement of results.
- m) The process of investigating incidents, occupational accidents, occupational diseases and their effect on improving OSH at PORVENIR S.A.
- n) Evaluation by senior management.
- o) Preventive, corrective, and improvement actions.

The conclusions of the OHSMS audit process shall determine whether the implementation of the OHSMS and each of its components and subcomponents will enable, among other things, the following:

- a) Establish whether it is effective in achieving the OHS policy and objectives of PORVENIR S.A.
- b) Determine whether it promotes worker participation.
- c) Verify that the analysis of indicators and the results of previous audits are considered.
- d) Demonstrate compliance with current national legislation applicable to OHS and the voluntary OHS requirements to which PORVENIR S.A. has subscribed.
- e) Establish that OHS goals and continuous improvement are being achieved.