



Red Pacto Global
Colombia

Communication on Progress

**Thematic axes of Human Rights, Labor, Environment and Fight
against Corruption**

Econometría Consultores

DECEMBER 2021

COMMUNICATION ON PROGRESS (COP)

THEMATIC AXES OF ANTI-CORRUPTION, HUMAN RIGHTS, LABOR, ENVIRONMENT AND FIGHT AGAINST CORRUPTION

ECONOMETRÍA CONSULTORES

TABLE OF CONTENTS

CHAPTER 1	5
CHAPTER 2	8
FIGURE 2.1 – ACTIONS OF THE COMPANIES IN MATTERS OF HR	10
Capítulo 1	11
Capítulo 2	11
2.1 Ethics committee and no-harm principle	11
2.2 Right to Health	12
2.3 Regulatory framework	13
2.4 Risks and preventive actions	14
TABLE 2.1 - RISKS AND PREVENTIVE ACTIONS OF THE RESPECT FOR HUMAN RIGHTS PROGRAM	15
2.5 Policy actions	18
FIGURE 2.2 - STRATEGIC PROCESS OF ACTIONS OF THE PROGRAM FOR THE RESPECT OF HUMAN RIGHTS ...	18
2.5.1 Action 1. Respect for human rights	18
2.5.2 Action 2. Sustainable Development Goals (SDGs)	18
2.5.3 Action 3. Background Checks	19
2.5.4 Action 4. Transparency of Information	19
2.5.5 Action 5. Anti-discrimination Policy	19
2.5.6 Action 6. Free from undue interference	19
2.5.7 Action 7. Covid-10 free	19
2.6 Infographics for Policy Socialization	19
CHAPTER 3	22
3.1 Rationale	22
3.2 Principles of the Respect for Labor Rights Program	22
3.3 Regulatory framework	24

3.4	Risks and preventive actions	25
3.5	Policy Actions	27
3.6	Socialization of Labor Policy	28
CHAPTER 4		30
4.1	Rationale	30
4.2	Principles of the Environmental Management Policy	31
4.3	Regulatory framework.....	32
4.4	Risks and preventive actions	34
4.5	Policy Actions	37
4.5.1	Action 1. Diagnosis of remote work practices	37
4.5.2	Action 1. Measurement	37
4.5.3	Action 2. Separation at source	37
4.5.4	Action 4. Paper path	38
4.6	Socialization of the Environmental Policy	38
CHAPTER 5		41
5.1	Rationale	41
5.2	Principles of the Anticorruption Program.....	42
Capítulo 3.....		43
5.3	Regulatory framework.....	43
TABLE 5.1 - STANDARDS AND AGREEMENTS RELEVANT TO THE ANTI-CORRUPTION PROGRAM		43
5.4	Risks and preventive actions	46
TABLE 5.2 - RISKS AND PREVENTIVE ACTIONS OF THE ANTI-CORRUPTION PROGRAM		46
5.5	Policy actions.....	51
FIGURE 5.1 - STRATEGIC PROCESS OF ACTIONS OF THE ANTICORRUPTION PROGRAM		51
5.5.1	Action 1. Code of Good Governance	51
5.5.2	Action 2. Data processing policy	51
5.5.3	Action 3. Expense Control	51
5.6	Socialization of the Anti-Corruption Policy	52

ACRONYMS

UNCAC	United Nations Convention Against Corruption
COP	Communication on Progress
PCOHS	Paritair Committee for Occupational Health and Safety
ITUC	International Trade Union Confederation
HR	Human Rights
DIAN	National Tax and Customs Directorate
UDHR	Universal Declaration of Human Rights
IFRS	International Financial Reporting Standards
C&A	Children and adolescents
SDG	Sustainable Development Goals
OAS	Organization of American States
OECD	Organization for Economic Cooperation and Development
IBO	International Business Organization
ILO	International Labor Organization

STATEMENT OF COMMITMENT

December 17, 2021

For our stakeholders:

Subject: **Statement of continuing support**

I am pleased to confirm that Econometría S.A. reaffirms its support for the Ten Principles of the United Nations Global Compact on Human Rights, Labor, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continuously improve the integration of the Global Compact and its principles into our business strategy, culture and day-to-day operations between the period November **2020 to December 2021**. We are also committed to sharing this information with our stakeholders via our main communication channels.

Sincerely yours,

MAURICIO OLIVERA

Director

PRESENTATION

This document presents the Communication on Progress (COP) that includes the promulgation and implementation of the policies of the thematic areas of human rights, labor, environment and anti-corruption within the framework of Econometría S.A.'s commitment to the Global Compact.

This engagement translates into the firm's commitment to act with transparency, to inspire leadership, to encourage goal setting and provide learning opportunities through the Ten Principles and the Sustainable Development Goals (SDGs), to track progress and to be accountable to society.

Since 2016 Econometría S.A. has been committed to the Global Compact. In 2021, we have achieved the goal of socializing policies of the thematic axes that are framed in the principles of the member countries of the United Nations:

1. Human Rights: Principles derived from the Universal Declaration of Human Rights (UDHR) of the United Nations (1948), which seek to promote, fulfill and guarantee the enjoyment and exercise of Human Rights.
2. Labor Standards: Principles derived from the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work (1998), which seek to ensure that social progress goes hand in hand with economic progress and development.
3. Environment: Principles derived from the Declaration of Principles and an International Plan of Action (Agenda 21), which seek sustainable development and the promotion of an economically, socially and environmentally sustainable future.
4. Fight against corruption: Principles derived from the United Nations Convention against Corruption (UNCAC), which seek to prevent, detect, punish and eradicate corruption in public functions and related activities.

On the other hand, as part of the responsibilities towards the Global Compact, its signers are obliged to generate an annual report on the progress made in the development of the actions carried out for the implementation of these principles. In this sense, since 2016, the Firm's General Management and its Good Governance Committee have been documenting and systematizing the progress achieved in these fields; in this third report the Firm renews its commitments and reflects its results which, as mentioned, consist of the enactment of policies on the four thematic axes, to socialize them within the company and make them available to the consulting guild, the Firm's clients and international organizations.

The COP has been structured in five chapters, the first of which is the schedule of work planned until the socialization of the four policies, which in turn are presented in the following four chapters, in the following order: human rights, labor, environment and anti-corruption.

Chapter 1

PROGRESS OF ACTIVITIES UP TO POLICY ENACTMENT

This chapter reports progress from November 2020 to December 2021 in the implementation of the four cross-cutting axes: Human Rights, Labor, Environment and Anti-Corruption. The main advances consisted of the formulation of each of the policies, their implementation through the activities carried out during the year, and the measurement of indicators where applicable.

GOALS	INDICATORS	START	GOAL	EXECUTION	STATUS
Define the objective of the policy in a participatory manner	Document with the definition of corruption	Apr-18	Sep-18		
Review of practices already implemented	List of practices	Apr-18	Sep-18		
Risk identification	List of risks	May-18	May -20		
Elaboration of the risk matrix	Risk matrix	May-18	Jul -20		
Develop a policy document	Policy document	Jun-18	Nov-20		
Presentations to the Board	# presentations	Sep-18 Nov-20	3	3	
Board Approval	Approved document		Nov-20	1	
Socialize the approved policy	# of socialization meetings	Feb-21	4	4	
Follow-up to the policy	Annual follow-up report	Mar-19	September of each year		

Status:

Green: Completed

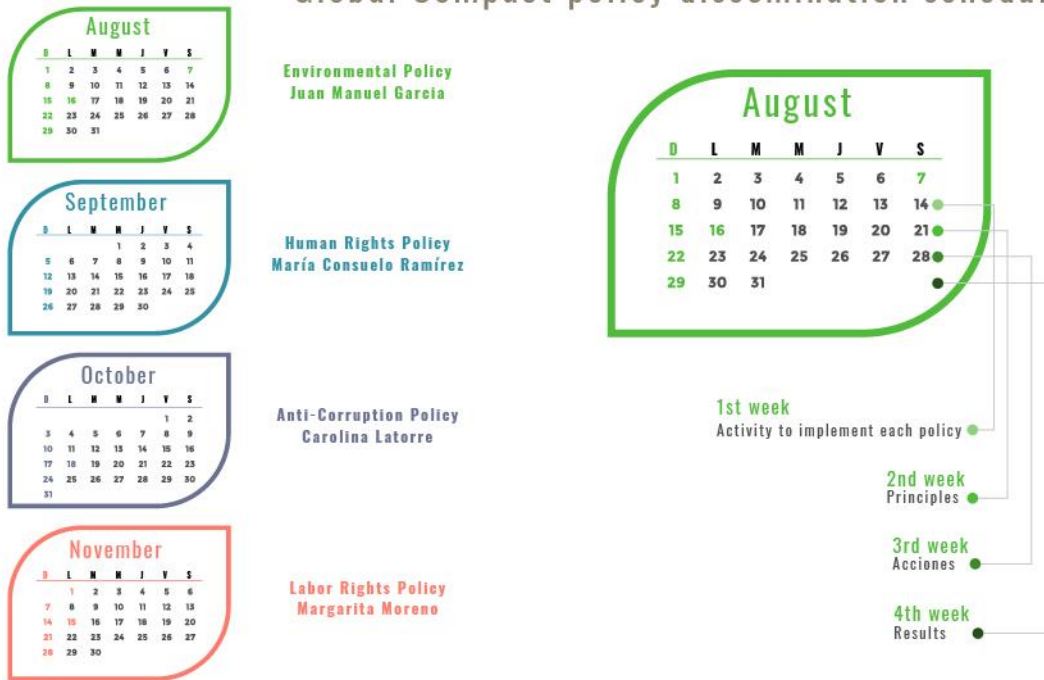
White: Not started

Yellow: In process

The following sections of the COP present each of the policies, with actions and indicators when applicable, as well as the socialization of these policies. Indeed, during 2021, the Good Governance Committee and Global Compact organized several activities for the socialization of the policies that had been enacted in 2020. Recreational activities such as trivia, billboards and infographics were implemented and are presented here.

The socialization schedule was as follows:

Global Compact policy dissemination schedule



THEMATIC AXIS I: SOCIALIZATION OF THE HUMAN RIGHTS POLICY

Chapter 2

HUMAN RIGHTS POLICY

RATIONALE

Econometría S.A. has promoted since its inception the protection of human rights, the prohibition of child labor, the exaltation of workers' rights, the care and protection of the environment and the non-tolerance of collusion and corruption practices in any of its manifestations and contexts.

In its internationalization process, Econometría S.A. finds an opportunity to strengthen its alliances and presence in other countries and to seek other scenarios that allow it to reach new environments, not only as a business opportunity, but also to adopt new practices that contribute to the construction of a company seen in a global environment with corporate responsibility and explicit attention to the protection of human rights, in compliance with the principles established in the Universal Declaration of Human Rights (UDHR) of the United Nations (1948), which seek to promote, fulfill and guarantee the enjoyment and exercise of Human Rights.

PRINCIPLES OF THE RESPECT FOR HUMAN RIGHTS PROGRAM

In furtherance of the above, Econometría S.A., expresses its commitment to the respect and promotion of Human Rights in all its actions. In this regard, the Firm's General Management and its Corporate Governance Committee have been working to document and systematize the progress achieved in this field, renew its commitments and socialize the results in this area.

In June 2011, the United Nations established the Guiding Principles on Business and Human Rights, which reflect a "global standard of conduct expected of all companies" (Oficina del Alto Comisionado de las Naciones Unidas para los Derechos Humanos, 2012), so that they establish a scheme to manage potential risks that could lead to negative consequences for human rights (HR).

These Guiding Principles are assumed by Econometría and the company is committed to respect, disseminate and comply with them, especially those rights established in the Political

Constitution of Colombia and those internationally recognized by the conventions and declarations on human rights signed by the country.

As a consequence of the above, the company shall prevent its actions from causing negative consequences on human rights and if they do, it shall be liable for them, for which it shall prevent or mitigate the possible damages that its operations may generate (Freire, Sanz, Sanz, & Hernando, 2013). Econometria must be very strict in the choice of its business partners, both nationally and internationally, and be very strict with the principle of due diligence in its selection, to avoid that any of its partners may cause human rights violations.¹

The company's risk analysis should not only be based on a cost/benefit analysis, but should also identify those who may be affected and, under the principle of action without harm, prevent the possible consequences of its activity (Freire, Sanz, Sanz, & Hernando, 2013).

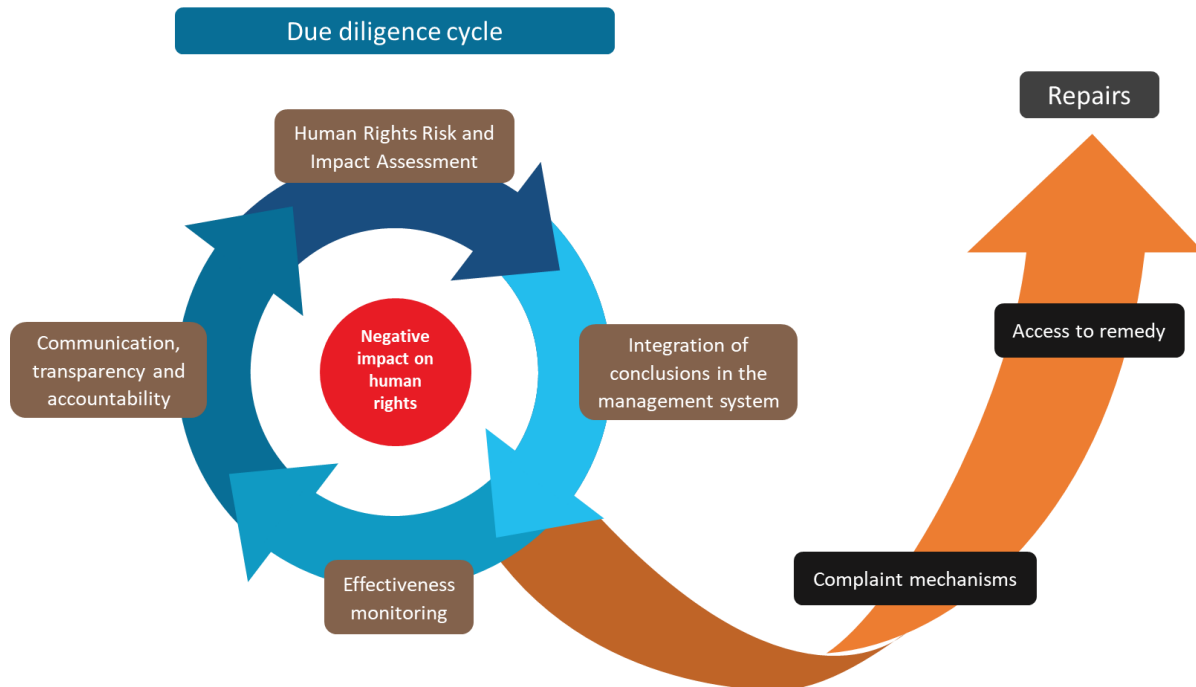
In this regard, and in accordance with Guiding Principle No. 15, Econometria expresses its political commitment to assume its responsibility to respect HR, to activate a due diligence process to identify, prevent, mitigate and account for how it addresses its impact on HR and, finally, it commits to remedy the negative consequences on HR that it has caused or contributed to cause. (Oficina del Alto Comisionado de las Naciones Unidas para los Derechos Humanos,, 2012).

In summary, the Company's human rights performance is reflected in the following graph:

¹Due Diligence "means the set of measures that constitute an ongoing management process, which a reasonable and prudent company needs to carry out in order to comply with its responsibility to respect human rights, according to its circumstances: sector of activity, operating context, size and similar factors" (Freire, Sanz, Sanz, & Hernando, 2013)".

Figure 2.1 – Actions of the companies in matters of HR

THE RESPONSIBILITY OF BUSINESSES TO RESPECT HUMAN RIGHTS



Source: (Freire, Sanz, Sanz, & Hernando, 2013)

In accordance with the above, the Global Compact proposes that companies contribute in 8 sectors (Pacto Global, 2019), namely:

1. Peace, justice and solid institutions.
2. End of poverty.
3. Zero hunger.
4. Reduction of inequalities
5. Health and wellness
6. Decent work and economic growth
7. Gender equality
8. Quality education

Econometría has always guaranteed, promoted and respected people's rights: They are part of its identity, especially those related to:

1. Respect for human dignity

2. Respect for diversity.
3. Respect for freedom of conscience, opinion, expression and thought.
4. The permanent quest for gender equality
5. Rejection and no tolerance to any form of discrimination.
6. The prohibition of child and adolescent labor, except for legal exceptions.
7. Respect for the environment in all of the company's activities.
8. Respect for life and all freedoms enshrined in law and international human rights treaties.
9. Respect for due process in all administrative processes of the company.
10. Respect for the right to education and teaching
11. Respect for the right to health
12. Respect for the right to assembly

2.1 ETHICS COMMITTEE AND NO-HARM PRINCIPLE

Econometría has an ethics committee that studies in depth issues that may involve human rights in the development of projects. Since 2017, it aims to analyze the feasibility of projects that have highly sensitive information or involve direct contact with the beneficiary population of a policy. Due to the complexities of some of the communities we work with, the diversity of methods and materials required for intervention studies, which require ethical and bioethical precautions for their application, Econometría has guidelines for the formation, operation, procedure and operational and administrative evaluation of the Ethics Committee, based on current national regulations and international agreements that define the ethical and bioethical aspects of research. In particular, the principles of independence, credibility and impartiality of the evaluators are taken into consideration.

With regard to specific ethical considerations, we have the following:

- The information that has been and will be shared with the evaluation team will be treated with confidentiality protocols. Each team member must sign contractual confidentiality clauses, and the files where this data is processed have secure access keys.
- The information collected in interviews, online surveys and focus groups will be used exclusively for the purposes of the evaluation, and the informant will be anonymized in the Final Report and its annexes.

With respect to the participants of the evaluation in interviews, an informed consent will be requested for the collection of information and its recording, making clear the objectives and methodology of the evaluation, the use of the information and the voluntary nature of the participation. The evaluation team will be based on the principles of dignity, non-discrimination, self-determination, protection, participation and consultation.

- Appropriate information on the purpose of the visits/interviews and the role of the attendees will be provided.
- The specific protocols of each culture will be respected.
- The anonymity of the informants will be respected and confidentiality will be guaranteed to preserve the safety of the informants.

The field work carried out by Econometría is framed within the principle of action without harm, an ethical approach that seeks to prevent an action, regardless of its intention, from causing harm, which implies the design of field operations that reflect on the actions to be developed and the effect they may cause on the people and communities in which information will be collected. Therefore, it works with behavioral guidelines and protocols that guide the field work of the professionals hired to develop it. These guidelines and protocols are based on respect for the dignity, autonomy and freedom of individuals (Fundación para la Cooperación Synergia, 2011).

Regarding the handling and use of information, Econometría has an information treatment policy that establishes the following actions in relation to field collection:

- Duly inform the subject of the purpose of the collection and the rights that he/she has by virtue of the authorization granted.
- Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- To require the Data Processor at all times to respect the security and privacy conditions of the Data Subject's information.
- Take care, in the wording and formulation of questions, that they do not undermine the human rights and privacy of the informants.

2.2 RIGHT TO HEALTH

In relation to the right to health, especially in pandemic situations such as the one related to COVID-19, Econometría has adopted the required preventive measures through the biosecurity protocol, in compliance with the measures issued by the national and local authorities. Likewise, it establishes its commitment to support the operation of the company in a safe and responsible manner, allowing its economic stabilization focused on the containment or non-propagation of the virus for the care of its human talent and all the company's collaborators. For Econometría it is important to maintain and/or implement measures that allow a stable, continuous and sustainable operation, implementing key measures from internal and external fronts.

2.3 REGULATORY FRAMEWORK

Econometría S.A. highlights, within the norms and agreements that guide the actions of its Human Rights Respect Program, the following:

1. Political Constitution of Colombia, 1991

2. United Nations Human Rights Instruments:

1. Universal Declaration of Human Rights
2. International Covenant on Civil and Political Rights - Law 74 of 1968.
3. International Covenant on Economic, Social and Cultural Rights - Law 74 of 1968.
4. Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment - Law No. 70 of 1986
5. Optional Protocol to the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment
6. International Convention for the Protection of All Persons from Enforced Disappearances
7. Second Optional Protocol to the International Covenant on Civil and Political Rights, Aiming at the Abolition of the Death Penalty
8. The International Convention on the Elimination of All Forms of Racial Discrimination - Law 22 of 1981
9. Convention on the Elimination of All Forms of Discrimination against Women - Law 51 of 1981
10. Convention on the Rights of the Child - Law 12 of 1991
11. International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families - Law 146 of 1994.
12. Convention on the Rights of Persons with Disabilities
13. United Nations Declaration on the Rights of Indigenous Peoples
14. Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities
15. Convention Relating to the Status of Refugees - Law 406 of 1997 - Law 35 of 1961
16. Protocol Relating to the Status of Refugees - Law 65 of 1979
17. Guiding principles for internal displacement
18. Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms
19. Declaration of principles on freedom of expression
20. Declaration on the right to development
21. Rio Declaration on Environment and Development
22. Vienna Declaration
23. Vienna Convention on the Law of International Treaties or between International Organizations
24. Convention on the Political Rights of Women - Law 35 of 1986

25. Guiding principles on human rights and business
26. Convention 138 on Minimum Age for Admission to Employment - Law 515 of 1999
27. Convention 182 on the Worst Forms of Child Labor - Law 704 of 2001
28. Convention 169 concerning Indigenous and Tribal Peoples in Independent Countries - Law 21 of 1991
29. Convention 87 on Freedom of Association and Protection of the Right to Organize - Law 26 of 1976.
30. Convention 98 concerning the application of the principles of the right to organize and collective bargaining - Law 27 of 1976.
31. Convention 3 on Maternity Protection - Law 129 of 1931
32. Convention 17 concerning Workmen's Compensation - Law 129 of 1931
33. Convention 18 on Occupational Diseases - Law 129 of 1931
34. Convention 19 on Equality of Treatment (Occupational Accidents) - Law 129 of 1931
35. Convention 29 on Forced Labor - Law 54 of 1962
36. Convention 30 on Working Hours (Shops and Offices) - Law 23 of 1967
37. Convention 52 on Holidays with Pay - Law 54 of 1962
38. Convention 95 on Wage Protection - Law 54 of 1962.
39. Equal Remuneration Convention 100, Law 23 of 1967
40. Convention 105 concerning the Abolition of Forced Labor, Law 54 of 1962.
41. Convention 106 on Weekly Rest (Shops and Offices) - Law 23 of 1967
42. Convention 111 concerning Discrimination in Respect of Employment and Occupation - Law 23 of 1967

3. Instruments of the American System for the Protection of Human Rights:

1. American Declaration of the Rights and Duties of Man
2. American Convention on Human Rights - Law 16 of 1972
3. Additional Protocol to the American Convention on Human Rights in the Area of Economic, Social and Cultural Rights - Law 319 of 1996.
4. Inter-American Convention to Prevent and Punish Torture - Law 409 of 1997.
5. Inter-American Convention on Forced Disappearance of Persons - Law 707 of 2001
6. Protocol to the American Convention on Human Rights to abolish the death penalty
7. Inter-American Convention on the Prevention, Punishment and Eradication of Violence against Women - Law 248 of 1995.
8. Inter-American Convention on the Elimination of All Forms of Discrimination against Persons with Disabilities. - Law 762 of 2002
9. Havana Convention on Asylum - Law 75 of 1931
10. Montevideo Convention on Political Asylum - Law 15 of 1936
11. Inter-American Convention on the Granting of Civil Rights to Women - Law 8 of 1959.

2.4 RISKS AND PREVENTIVE ACTIONS

Econometría S.A. identifies the following risks associated with the development of its normal activities.

Table 2.1 - Risks and preventive actions of the Respect for Human Rights Program

	IDENTIFICATION OF THE RISKS IN HUMAN RIGHTS				RISK CATEGORIZATION			CONTROLS			
TYPE OF RISK	PROCESS	RISK FACTOR	RISK	SCHEME OF HUMAN RIGHTS VIOLATION	Risk Level (1-3)	Impact of Risk (1-3)	risk valuation	PREVENTIVE ACTION	CONTROL LEVEL (0-100%)+12:15	Value of Residual Risk (0-9)	SOLUTIONS
	Proposals	Lack of diligence in the selection of Econometria's partners	Potential partners have participated in actions against human rights in the country or abroad.	Potential partners have participated in human rights violations to gain access to hiring, public office, positions of power, etc.	1	3	3	All Econometria's personnel and its external consultants are aware of the policy that under no circumstances will inappropriate conduct be accepted or proposed. Rating of the level of risk in human rights matters.	95%	0,0015	Reaction guidelines for different situations
	Proposals	Participation in bids and/or tenders with companies that are under investigation or have a firm sanction for human rights violations.	Presentation of proposals to companies that open bidding processes and are being investigated or have been convicted for human rights violations.	Participation in processes	1	3	3	Preliminary investigation of companies opening bidding processes	95%	0,15	Failure to submit the proposal or withdrawal of the proposal
	Projects	Collection of information from different stakeholders	Failure to comply with regulations on confidentiality of information	To disclose the data of persons who have participated in the processes in violation of the rules	2	3	6	Guideline within the firm and in the field to guarantee the confidentiality of information.	95%	0,3	Seek alternative solutions with stakeholders

IDENTIFICATION OF THE RISKS IN HUMAN RIGHTS				RISK CATEGORIZATION			CONTROLS			
			of confidentiality of information.							
Projects	Cohesion to freedom of thought, opinion and/or expression	External agent, company management or the project manager pressures or intimidates by limiting freedom of thought, opinion and/or expression.	External agent, company management or the project manager pressuring or intimidating consultants or company personnel for their opinions and technical concepts in the development of a project.	1	3	3	Guarantee freedom of expression, thought and opinion in all areas of the company and especially in the development of projects.	95%	0,15	Policy of respect for the opinions and thoughts of others
Projects	Possible human rights violations in the development of the project, especially in the field work.	Infringement of human rights of project participants	Vulnerability of highly sensitive information: not having methodologies, tools and instruments that are adapted to different cultures;	1	3	3	Send the project to the ethics committee when required for study and recommendations.	95%	0,15	The evaluation team shall adopt the recommendations issued by the Ethics Committee.
General	Child Labor	Use of children and adolescents in projects or as company personnel when not permitted by law.	Deficient contracting processes	1	3	3	Prohibition to hire children and adolescents except in cases authorized by law. All company personnel and external consultants must be informed of this prohibition.	95%	0,15	prohibition of hiring children and adolescents except in cases authorized by law.
General	practices that violate human rights	Contracting of suppliers that have practices that violate human rights.	Keep suppliers who knowingly use child labor, or who do not respect labor rights, or who discriminate on the basis of gender, race, politics, religion or	1	3	3	Inform suppliers about the company's policy of zero tolerance to practices that violate human rights.	95%	0.15	Termination of the contract with suppliers that maintain such practices;

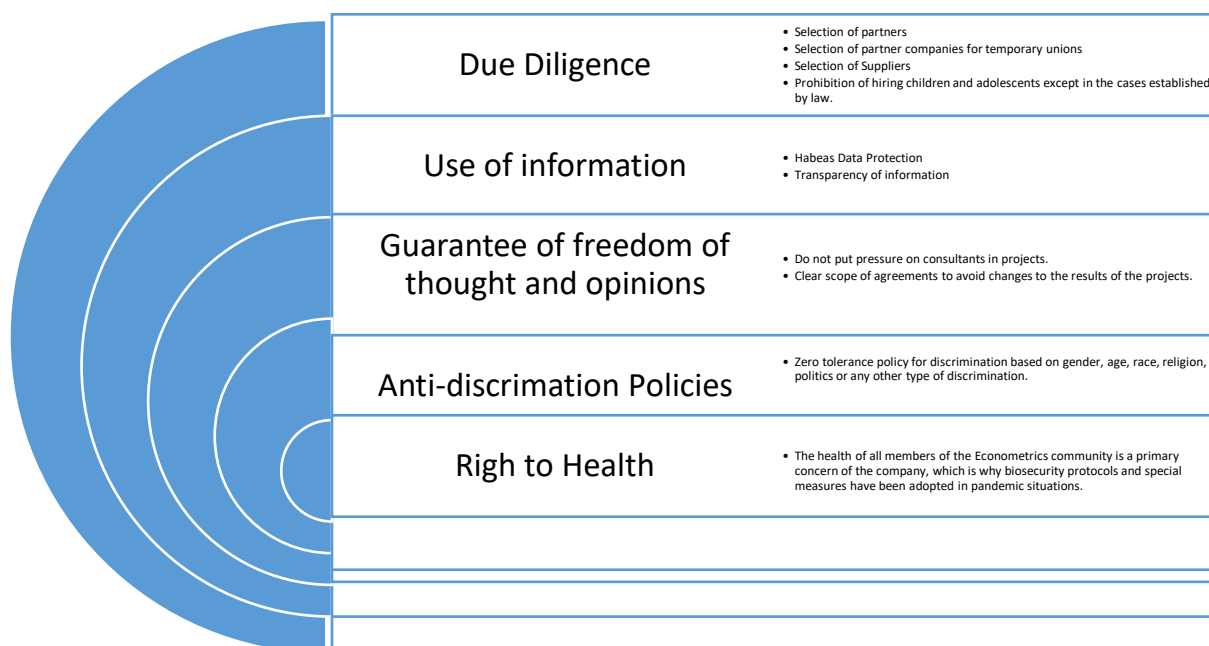
	IDENTIFICATION OF THE RISKS IN HUMAN RIGHTS				RISK CATEGORIZATION			CONTROLS			
				any other type of discrimination, benefiting in their procurement costs.							
	General	Discrimination	Discrimination caused by gender, politics, religion, disability, ethnicity and other forms of discrimination	Directors, partners, Econometria staff or external consultants have discriminatory attitudes based on gender, racial, political, religious or any other type of discrimination.	1	3	3	Inform everyone about the company's zero tolerance policy on discrimination.	95%	0,15	zero tolerance policy for discrimination
	General	Transparency of information	The company does not have transparent information	Directors, partners, Econometria staff or external consultants have discriminatory attitudes based on gender, racial, political, religious or any other type of discrimination.	1	3	3	Inform everyone about the company's zero tolerance policy on discrimination.	95%	0,15	Publish the HR policy on the company's website.
	General	Transparency of information	The members of Econometría and its various associates are not aware of the company's human rights policy.	Lack of knowledge of human rights policy	1	2	2	Publication and socialization of the human rights policy.	95%	0,1	Publish the HR policy on the company's website.
	General	Covid 19 pandemic	Infection of some of its collaborators	violation of the right to health	1	3	3	Adoption, publication and socialization of the biosafety protocol.	95%	0,15	Implementation of permanent follow-up of the biosafety protocol.

Source: Prepared by Econometría Consultores

2.5 POLICY ACTIONS

The actions of the Respect for Human Rights Program are aimed at preventing the risks identified and are framed within the strategic process illustrated below.

Figure 2.2 - Strategic process of actions of the Program for the Respect of Human Rights



Source: Prepared by Econometría Consultores

As a result of the analysis of the company's production process, seven specific actions have been defined to implement the Program.

2.5.1 Action 1. Respect for human rights

Econometría seeks in all its actions to promote, disseminate and respect the human rights of the people on whom it conducts its research, studies and consultancies, and of its collaborators on the principle of relevance of consultation on the populations observed and the principle of action without harm. For the company, respect for human rights is a fundamental value and respect and dignity of others is part of its identity.

2.5.2 Action 2. Sustainable Development Goals (SDGs)

Econometria seeks to ensure that its recommendations to government agencies and international organizations are geared towards the fulfillment of the Sustainable Development Goals.

2.5.3 Action 3. Background Checks

In order to ensure due diligence, a review of the legal, criminal and sanctioning background of potential partners, partner companies in temporary joint ventures, as well as suppliers and consultants will be carried out. Verification will be carried out by official means.

2.5.4 Action 4. Transparency of Information

All Econometría's policies are public and known by all natural and legal persons hired by the company. The policies are freely available to the public on the website.

2.5.5 Action 5. Anti-discrimination Policy

Econometría, as one of its core values, has since its inception a zero tolerance policy against discrimination based on gender, age, ethnicity, religion, sexual orientation, politics or any other type of discrimination that may arise.

2.5.6 Action 6. Free from undue interference

Econometría guarantees the freedom of opinion, thought and expression of all its employees in all areas of the company, especially in the execution of projects. Based on the principles of objectivity and integrity, the results of the firm's studies cannot be modified or influenced by the clients or executors of the interventions.

2.5.7 Action 7. Covid-10 free

For the company, the health of its collaborators, as well as that of all the stakeholders involved in the studies and research of the firm, is of vital importance, which is why it has robust biosafety protocols in all areas and in the execution of projects, especially if they involve the use of qualitative and quantitative methodologies.

2.6 INFOGRAPHICS FOR POLICY SOCIALIZATION

HUMAN RIGHTS POLICY

Principles:

- A. Respect for human dignity
- B. Respect for diversity
- C. Respect for freedom of conscience, opinion, expression and thought.
- D. The permanent search for gender equality
- E. Rejection and zero tolerance to any form of discrimination.
- F. The prohibition of child and adolescent labor, except for legal exceptions.
- G. Respect for the environment in all company activities.
- H. Respect for life and all freedoms enshrined in law and international human rights treaties.
- I. Respect for due process in all administrative processes of the company.
- J. Respect for the right to education and teaching
- K. Respect for the right to health
- L. Respect for the right to assembly



General Guidelines:

Ethics Committee

Its purpose is to analyze the feasibility of projects that have highly sensitive information or when work is carried out that involves direct contact with the beneficiary population of a policy due to the complexities of some communities.

Action without Harm

The approach is framed in all of Econometría's actions, although it is mainly reflected in the field work, in order to prevent any action, regardless of its intention, from causing harm, which implies the design of field operations that reflect on the actions to be developed and the effect they may cause on people and communities in which information will be collected. Therefore, protocols are used to guide the field work on guidelines for the conduct of field professionals based on respect for the dignity, autonomy and freedom of individuals.

Use of Information

Regarding the handling and use of information, Econometría has an information treatment policy that establishes the actions related to field collection.

Actions:

1. Respect for human rights: Econometría seeks in all its actions the promotion, dissemination and respect for human rights. For the company, respect for human rights is a fundamental value and respect and dignity of others is part of its DNA.
2. Sustainable Development Goals (SDGs): Econometría seeks to ensure that its recommendations to government agencies and international organizations are geared towards the fulfillment of the Sustainable Development Goals.
3. Background Check: In order to ensure due diligence, a background check will be conducted on potential partners, joint venture partners, suppliers and consultants.
4. Transparency of information: All Econometría's policies are public and known by all natural and legal persons hired by the company. The policies are freely available to the public on the website.
5. Anti-discrimination Policy: Econometría, as one of its core values, has since its creation a zero tolerance policy against discrimination based on gender, age, ethnicity, religion, politics or any other type of discrimination that may arise.
6. Free from undue interference: Econometría guarantees the freedom of opinion, thought and expression of all its employees in all areas of the company, especially in the execution of projects.
7. Covid-10 free: For the company, the health of its collaborators is of vital importance, which is why it has robust biosafety protocols in all areas and in the execution of projects, especially if they involve the use of qualitative and quantitative methodologies.

THEMATIC AXIS II: SOCIALIZATION OF LABOR POLICY

Chapter 3

LABOR POLICY

3.1 RATIONALE

Econometría S.A. has promoted from its actions and in line with its human rights policy, the protection of human rights, the prohibition of child labor, the exaltation of workers' rights, the care and protection of the environment and the non-tolerance of collusion and corruption practices in any of its manifestations and contexts.

In pursuit of this objective, and as also established in the first thematic axis, since 2016 Econometría S.A. requested to be included as part of the member companies of the United Nations Global Compact, committing to comply with Labor standards based on the Principles derived from the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work (1998), which seek that social progress goes hand in hand with economic progress and development.

3.2 PRINCIPLES OF THE RESPECT FOR LABOR RIGHTS PROGRAM

Econometría S.A., expresses its commitment to respect and promote the labor rights of our country, as well as all the guidelines that entities such as the International Labor Organization (ILO), the International Trade Union Confederation (ITUC) and the International Organization of Employers (IOE) have promulgated to ensure the implementation and enforcement of labor principles as a contribution to social development. For this reason, throughout its years of operation, it has always worked to guarantee work spaces framed in the appropriation of good labor practices.

The ILO is the United Nations' international labor standards body. Labor principles are derived from ILO Conventions and Recommendations, which set international labor standards on a wide range of issues related to the world of work, including human rights at work, occupational safety and health, employment policies, and human resources development.

In view of the growing concern about the social consequences of globalization, in 1995, the members of the ILO - the representatives of governments, employers and workers at the

international level - recognized that four categories of labor principles and rights expressed in eight Conventions (the so-called "fundamental conventions") should be considered fundamental, as they protect the basic rights of workers. The categories are as follows :

- a) freedom of association and the effective recognition of the right to collective bargaining;
- b) the elimination of all forms of forced or compulsory labor;
- c) the effective abolition of child labor; and
- d) the elimination of discrimination in respect of employment and occupation.

These Guiding Principles are assumed by Econometría, which expresses the company's commitment to respect, disseminate and comply with them, especially those rights established in the Political Constitution of Colombia and in the labor regulations in force. As part of its initiative to promote labor practices that respect these principles, the following policies have been established, which go beyond legal compliance:

1. Permanent commitment to prevent our actions from causing negative consequences on each one of our collaborators, in case it happens, we take responsibility for them, and we take the necessary measures to avoid their repetition²
2. Based on the fact that the causes of forced labor are almost always poverty, inequality and discrimination, we strive to provide our employees with opportunities to access education as a tool to improve their quality of life and that of their families. ³
3. Gender is not a selection criterion for Econometría's employees. The majority of our staff is made up of women, as are our management positions. We have salary policies that guarantee equal remuneration for both genders.
4. We promote labor inclusion as a way of having qualified personnel without any discrimination. We have, and will continue to have, people with disabilities on our staff.
5. All of our employees have an employment contract that establishes the terms and conditions of service, the voluntary nature of employment, and the freedom to resign from the job.
6. We support the labor inclusion of young people, that is why we have agreements with different universities, through which we engage interns, with the option of being hired by Econometría, at the end of their internship.
7. We comply with the minimum age provisions of national labor legislation and ensure that there is no child labor in the supply chain of our services.

² International Labor Organization (ILO) 2010, Labor Principles of the United Nations Global Compact Guide for Businesses.

³ Idem 1

8. We have a Coexistence Committee that is responsible not only for reviewing cases related to labor and sexual harassment, but also for dealing with complaints and cases related to discrimination.
9. Our Paritair Committee for Occupational Health and Safety PCOHS, works to guarantee Econometría's employees a healthy and safe working environment.
10. Our organizational culture encourages employee participation and is characterized by a component of flexibility, which results in a balance between work and family life.

3.3 REGULATORY FRAMEWORK

- **Political Constitution of Colombia, 1991**
- **Substantive Labor Code**
- **Labor Conventions ⁴**
 1. Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87)
 2. Right to Organize and Collective Bargaining Convention, 1949 (No. 98)
 3. Forced Labor Convention (No. 29), 1930
 4. Abolition of Forced Labor Convention (No. 105), 1957
 5. **Minimum Age Convention (No. 138), 1973**
 6. **Worst Forms of Child Labor Convention (No. 182), 1999**
 7. **Equal Remuneration (No. 100) Convention, 1951**
 8. **Discrimination (Employment and Occupation) Convention (No. 111), 1958**

⁴The texts of the ILO Conventions and Recommendations can be found at <http://www.ilo.org/ilolex/spanish/index.htm>.

3.4 RISKS AND PREVENTIVE ACTIONS

TYPE OF RISK	PROCESS	RISK FACTOR	OCCUPATIONAL RISKS IDENTIFICATION		RISK CATEGORIZATION		CONTROLS			
			RISK	VIOLATION SCHEME	RISK LEVEL (1-3)	IMPACT OF THE RISK (1-3)	PREVENTIVE ACTION	CONTROL LEVEL	RESIDUAL RISK RATING	SOLUTIONS
TYPE OF RISK	General	Inequality and discrimination	Non-inclusive selection and hiring processes Differential wage policies	Differential treatment in the processes of selection, hiring and promotion of people, where there are gender, disability, race, etc. biases. Variable salaries according to the gender of the position holder	1	3	* Selection processes based on the competencies of the person occupying the position (Position Profile). * Remunerations established by position, experience and education in compliance with current legal regulations and in accordance with the labor market. * Ideological flexibility * Non-discriminatory benefits	95%	5%	Review policies and actions established against specific cases.
	General	Involuntary Labor	Demanding a job or service from a person without that person volunteering for the job or service.	Employment of personnel who do not offer their services voluntarily but under duress.	1	3	* Standardized employment contracts that establish the terms and conditions of service, the voluntary nature of employment, the freedom to resign from the job. These include all legal aspects related to work and its remuneration. * Time sheets	95%	5%	Review policies and actions established against specific cases.
TYPE OF RISK	PROCESS	RISK FACTOR	OCCUPATIONAL RISKS IDENTIFICATION		RISK CATEGORIZATION		CONTROLS			
			RISK	VIOLATION SCHEME	RISK LEVEL (1-3)	IMPACT OF THE RISK (1-3)	PREVENTIVE ACTION	CONTROL LEVEL	RESIDUAL RISK RATING	SOLUTIONS
TYPE OF RISK	General	Labor Harassment	Persistent and systematic	* Insulting verbal expressions	1	3	*Coexistence Manual *Coexistence Committee	90%	10%	Periodic review of manuals

			behaviors exercised on a person to intimidate, or cause harm at work.	acts of violence * Excessive workloads * Obstructing or delaying work assigned to them * Differential treatment on the basis of race, gender, religious beliefs, etc. * Assignment of unequal functions and without minimum safety and security requirements.			*Complaints procedure *Training of workers			Reinduction on coexistence issues
	General	Occupational Risks	Non-prevention of occupational accidents and diseases	Working conditions that jeopardize the health and safety of workers	1	3	Implemented SGGST	85%	15%	Continuous monitoring and review of the SGSST, to detect, through corrective and preventive actions, aspects for improvement.

3.5 POLICY ACTIONS

Measurement

LABOR POLICY INDICATORS			
NAME		FREQUENC	OUTCOME
FEMALE PARTICIPATION	CALCULATION	Y	
Shareholders	% of equity interest		40%
	No Women Members /Total Members		47%
Board of Directors	No Women Board of Directors/Total Board members		50%
Executives	No Women Directorships/Total persons in Directorships		60%
Personnel	No Women Employees/Total Personnel Employees		72%
SALARY GAP	CALCULATION	FREQUENC	OUTCOME
		Y	
Total	Average Wage Female/Average Wage Male		0.99
Analysts			1.35
Assistant			1.09
Directors	Average Salary Female per position/Average Salary Male per position		1.05
Executives			0.83
PARTICIPATION OF PEOPLE WITH DISABILITIES	CALCULATION	FREQUENC	OUTCOME
		Y	
Personnel	No persons in condition of disability/No Total Persons		9.76%
WORKPLACE HARASSMENT			
Harassment Complaints	Percentage of unresolved complaints		0%
	Number of complaints filed		0
OCCUPATIONAL SAFETY AND HEALTH MANAGEMENT SYSTEM	CALCULATION	FREQUENC	OUTCOME
		Y	
OSHA	Percentage of progress in the design and implementation of OSHA		93%
CHILD LABOR	CALCULATION	FREQUENC	OUTCOME
		Y	
MINORS			
	Number of minors hired		0
	Number of contracts with minors under legal conditions		0

3.6 SOCIALIZATION OF LABOR POLICY

LABOR POLICY



These Guiding Principles are assumed by Econometría and the company is committed to respect, disseminate and comply with them, especially those rights established in the Political Constitution of Colombia and in the labor regulations in force. As part of its initiative to promote labor practices that are not only legal but also beneficial to each of its employees, the following policies have been established:



1

Permanent commitment to prevent our actions from causing negative consequences on each one of our collaborators, in case it happens, we are responsible for them, and we take the necessary measures to avoid their repetition.

2

Based on the fact that the causes of forced labor are almost always poverty, inequality and discrimination, we strive to provide our employees with opportunities to access education as a tool to improve their quality of life and that of their families.



3

In order to contribute to the reduction of inequality and discrimination, the majority of our staff is female, as are our management positions. And we have wage policies that guarantee equal pay for both genders.



4

We promote labor inclusion as a way to have qualified personnel without discrimination and that is why we have people with disabilities in our plant.

5

All of our employees have an employment contract that establishes the terms and conditions of service, the voluntary nature of employment, and the freedom to resign from the job.



6

We support the labor inclusion of young people, that is why we have agreements with different universities, through which we engage interns, with the option of being hired by Econometría, at the end of their internship.



7

We abide by the minimum age provisions of the national labor legislation.

8

We have a Coexistence Committee that is responsible not only for reviewing cases related to workplace harassment, but also for dealing with complaints and cases related to discrimination in our environment.



9

Our Paritary Committee for Occupational Health and Safety PCOHS, works to guarantee Econometría's employees a healthy and safe working environment.



10

Our organizational culture encourages employee participation and is characterized by a component of flexibility, which results in a balance between work and family life.

THEMATIC AXIS III: SOCIALIZATION OF THE ENVIRONMENTAL POLICY

Chapter 4

ENVIRONMENTAL POLICY

4.1 RATIONALE

Econometría S.A. is aware that its activities have an effect on the environment and therefore for several years has adopted the commitment to develop strategies and promote good practices focused on the prevention, control and mitigation of environmental impacts generated in its operations. Although such strategies have been successfully developed within the Company, they have not yet been documented and their impacts have not yet been measured.

In its internationalization process, Econometría S.A. has found an opportunity to strengthen its alliances and presence in other countries, and to seek other scenarios that allow it to reach new environments, not only as a business opportunity, but also to adopt new practices that contribute to the construction of a company that is seen in a global environment as an example of corporate responsibility.

In pursuit of this objective, since 2016 Econometría S.A. requested to be included as part of the member companies of the United Nations Global Compact, which is an "international initiative that promotes implementing 10 universally accepted Principles to promote sustainable development in the areas of Human Rights and Business, Labor Standards, Environment and Anti-Corruption in the activities and business strategy of companies" (Global Compact, 2018). These principles are framed in declarations signed by member countries of the United Nations:

5. Human Rights: Principles derived from the Universal Declaration of Human Rights (UDHR) of the United Nations (1948) and seek to promote, fulfill and guarantee the enjoyment and exercise of Human Rights.
6. Labor Standards: Principles derived from the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work (1998) and seek to ensure that social progress goes hand in hand with economic progress and development.

7. Environment: Principles derived from the Declaration of Principles and an International Plan of Action (Agenda 21) and seek sustainable development and the promotion of an economically, socially and environmentally sustainable future.
8. Fight against corruption: Principles derived from the United Nations Convention against Corruption (UNCAC) and seek to prevent, detect, punish and eradicate corruption in public functions and related activities.

Within the framework of the application for admission as a member of the United Nations Global Compact, Econometría S.A. found an opportunity to document its practices in favor of the environment and to strengthen them in an Environmental Management Policy that offers all members of the firm guidance on commitments to environmental responsibility, from an integral perspective of the company's activities. In this order of ideas, the first version of the Environmental Management Policy was prepared and adopted by the firm in the first half of 2018.

Econometría S.A. reviews its policies annually. With regard to the Environmental Management Policy, the 2019 review ratified the document produced in 2018; the 2020 review identified the need to make some adjustments, mainly due to changes in the work dynamics resulting from the COVID19 pandemic, which led to a significant increase in remote work. This document then corresponds to the adjusted version of the Policy.

The Environmental Management Policy is adopted by the company's management and applies to all employees, whether they are hired on a temporary basis or as contractors. Likewise, the company encourages its employees, partners and contractors to adopt environmentally friendly practices.

4.2 PRINCIPLES OF THE ENVIRONMENTAL MANAGEMENT POLICY

Econometría S.A.'s Environmental Management Policy is based on the principle of efficient use of resources and proper waste management and disposal, under the following three definitions:

- Efficient use of resources. Use of inputs in the company in a way that achieves maximum utilization, in accordance with practices accepted as environmentally friendly.
- Adequate management of resources. Collection or storage of waste in a manner that does not generate contamination risks within the company and in a way that facilitates its proper management.
- Adequate disposal of resources. Delivery of the company's waste to suitable third parties for disposal or use.

Econometría S.A. accepts that its activities have an effect on the environment and therefore adopts the following principles as part of its Environmental Management Policy:

- Disclose and strictly comply with current environmental legislation.
- Continuously improve the company's environmental performance under a preventive approach, based on process control, reliable and timely information, and on the promotion and participation of its employees.
- Define strategies for the best environmental performance of the company, setting goals and analyzing their results and impacts periodically.
- Identify the budgetary needs for the development of the defined strategies and take the pertinent steps to obtain the necessary resources and adopt them.
- Monitor the monthly consumption of paper, water and electricity, and the generation of solid waste, defining actions to reduce them to efficient levels.
- In addition to reducing the consumption of inputs and preventing the generation of solid waste, the latter must be properly managed for reuse, recovery of parts, recycling, treatment and final disposal.
- Promote knowledge dissemination practices that strengthen the culture of resource care in our employees.
- Periodically update and publish the company's environmental policy and commitments.

4.3 REGULATORY FRAMEWORK

Econometría S.A. highlights, within the rules and agreements that guide the actions of its Environmental Management Policy, the following.

SELF-REGULATORY INITIATIVES	DESCRIPTION
The targets of the Sustainable Development Goals	Specifically, with respect to Goal 6 (Clean Water and Sanitation), to contribute to: <ul style="list-style-type: none"> • reducing pollution, eliminating dumping and minimizing the release of hazardous materials • increase recycling and reuse without risks • increasing the efficient use of water resources
	Specifically, with regard to Goal 7 (Affordable and Non-Polluting Energy) contribute to: <ul style="list-style-type: none"> • increasing the proportion of renewable energy in its energy sources • improving energy efficiency
	Specifically, with regard to Goal 12 (Responsible production and consumption), contribute to: <ul style="list-style-type: none"> • significantly reducing waste generation through prevention, reduction, recycling and reuse activities • adopt sustainable practices and incorporate sustainability information into their reporting cycle.

SELF-REGULATORY INITIATIVES	DESCRIPTION
	<ul style="list-style-type: none"> ensure that people around the world have the information and knowledge relevant to sustainable development and lifestyles in harmony with nature.
Global Compact	<p>Seventh principle: "Companies should maintain a preventive approach that favors the environment."</p> <p>Eighth principle: "Companies should encourage initiatives that promote greater environmental responsibility."</p> <p>Ninth principle: "Companies should encourage the development and diffusion of environmentally friendly technologies."</p>
Political Constitution of Colombia	<p>Article 58. "Property is a social function that implies obligations. As such, it has an inherent ecological function".</p> <p>Article 95. "They are duties of the person and of the citizen... 8. To protect the country's cultural and natural resources and ensure the conservation of a healthy environment".</p>
Law 99 of 1993	Environmental Law
Decree 3102 of 1997	In connection with the installation of low water consumption equipment, systems and implements.
Decree 1713 of 2002 and amending regulations	Regulations of the public sanitation service in Colombia developed within a framework of integrated management of ordinary solid waste.
Decree 596 of 2016	Outline of the activity of using the public sanitation service.
Law 1931 of 2018	Guidelines for the management of climate change by public and private persons.

4.4 RISKS AND PREVENTIVE ACTIONS

Econometría S.A. identifies the following risks associated with the development of its normal activities.

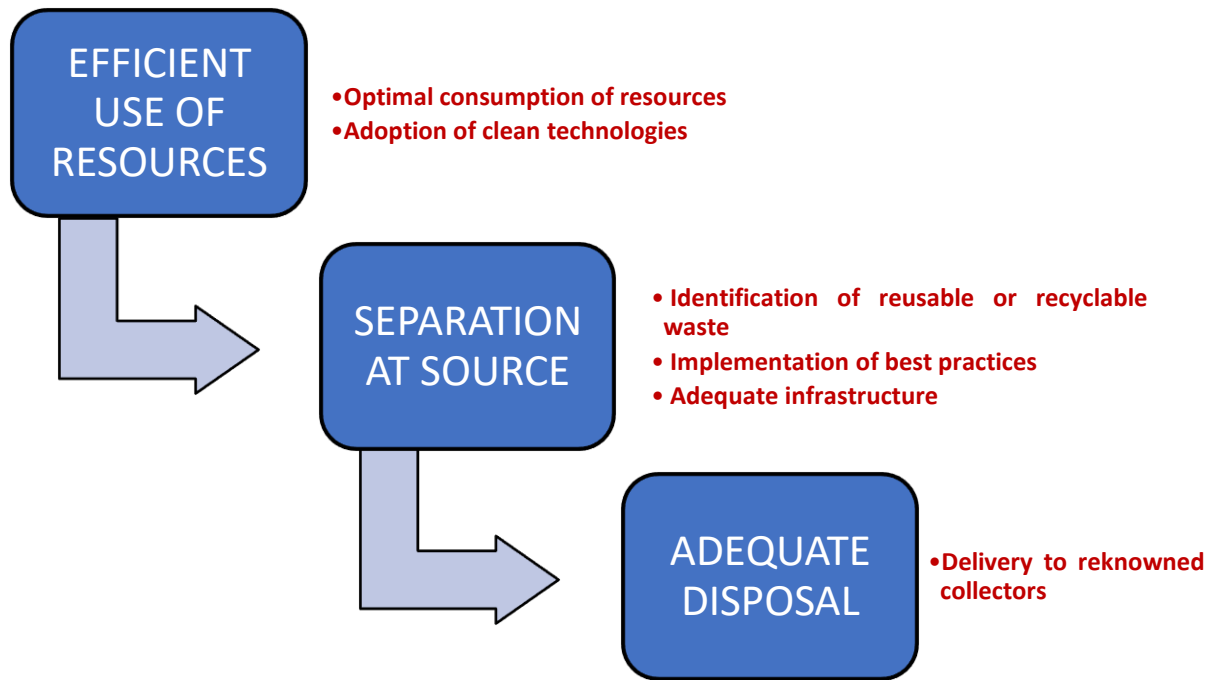
PRACTICE	GENERAL DEFINITION	SPECIFIC RISK DESCRIPTION	RISK FACTOR	RISK LEVEL (1-3)	IMPACT OF RISK (1-3)	RISK ASSESSMENT (LEVEL X IMPACT) (1-9)	PREVENTIVE ACTION	CONTROL LEVEL (0-100%)	VALUE OF RESIDUAL RISK (0-9)
Inefficient consumption of resources	It is the use of supplies in the company in ways that do NOT achieve their maximum utilization, in accordance with practices accepted as environmentally friendly.	Higher than necessary consumption of supplies in the company's facilities for the development of the firm's activities.	Environmentally unfriendly practices	1	2	2	Monitoring of water, electric power and paper consumption Implementation of good paper consumption practices	50%	1,00
		Consumption of supplies in excess of levels required at remote workplaces	Environmentally unfriendly practices	2	1	2	Identification and socialization of good paper consumption practices	25%	1,50
		Non-adoption of clean or efficient technologies	Lack of knowledge and/or resources to adopt	3	1	3	Annual review of clean and efficient alternatives that can be adopted by the company	75%	0,75
Noise generation	Generation of sound levels, as a result of the firm's own activities, in magnitudes and for periods of time that are recognized as harmful to human health.	Use of noise-generating equipment.	Lack of awareness of healthy noise level limits.	1	2	2	Noise level measurements	90%	0,20

PRACTICE	GENERAL DEFINITION	SPECIFIC RISK DESCRIPTION	RISK FACTOR	RISK LEVEL (1-3)	IMPACT OF RISK (1-3)	RISK ASSESSMENT (LEVEL X IMPACT) (1-9)	PREVENTIVE ACTION	CONTROL LEVEL (0-100%)	VALUE OF RESIDUAL RISK (0-9)
Improper waste management	The collection or storage of waste in a manner that generates contamination risks within the company or hinders the proper disposal of waste.	No separation at source	Lack of knowledge of the waste generated at the sites where remote work is performed	1	1	1	Diagnosis of waste generated in remote work and socialization of good practices for its management.	25%	0,75
			Lack of knowledge of the proper classification of waste types to facilitate its disposal. Not having the appropriate infrastructure for each type of waste.	1	3	3	Implementation of source separation process Implementation of specific processes for the collection of batteries, electronic waste, toner and cleaning waste.	75%	0,75
		Inadequate waste collection	Lack of internal processes followed by all the firm's personnel to properly dispose of their waste.	3	2	6	Implementation of source separation process	80%	1,20
		Inadequate waste storage	Lack of knowledge of the proper way to store waste. Not having adequate infrastructure for each type of waste.	1	2	2	Implementation of source separation process Implementation of specific processes for the collection of batteries, electronic waste, toner and cleaning waste.	75%	0,50

PRACTICE	GENERAL DEFINITION	SPECIFIC RISK DESCRIPTION	RISK FACTOR	RISK LEVEL (1-3)	IMPACT OF RISK (1-3)	RISK ASSESSMENT (LEVEL X IMPACT) (1-9)	PREVENTIVE ACTION	CONTROL LEVEL (0-100%)	VALUE OF RESIDUAL RISK (0-9)
Inadequate waste disposal	Delivery of the firm's waste to third parties, in an inadequate manner.	Incorrect packaging of waste	Lack of knowledge of the characteristics of the bags to be used for the delivery of each type of resource. Failure to use the proper bags.	1	2	2	Implementation of specific processes for the collection of batteries, electronic waste, toner and cleaning waste.	75%	0,50
		Delivery of waste to inappropriate waste collector or company	No agreements with recycling companies for the disposal of reusable waste. Non-use of places where electronic, computer, peripheral and hazardous waste can be properly disposed of.	2	3	6	Identification of recyclers and drop-off points for batteries, electronic waste, toner, and waste	90%	0,60

4.5 POLICY ACTIONS

The actions of the Environmental Management Policy are aimed at preventing the risks identified and are framed within the strategic process illustrated below.



Source: In-house

As a result of the analysis of the firm's production process, both at the company's facilities and at remote work sites, five specific actions have been defined to operationalize the Policy. They mainly affect the consumption and management of paper, electrical energy and the disposal of electronic waste.

4.5.1 Action 1. Diagnosis of remote work practices

Conduct a virtual workshop with the firm's personnel, by the end of 2020, to identify how remote work practices can generate waste and to learn how such waste is being managed. Based on this diagnosis, a guide of good management practices should be prepared and disseminated.

4.5.2 Action 1. Measurement

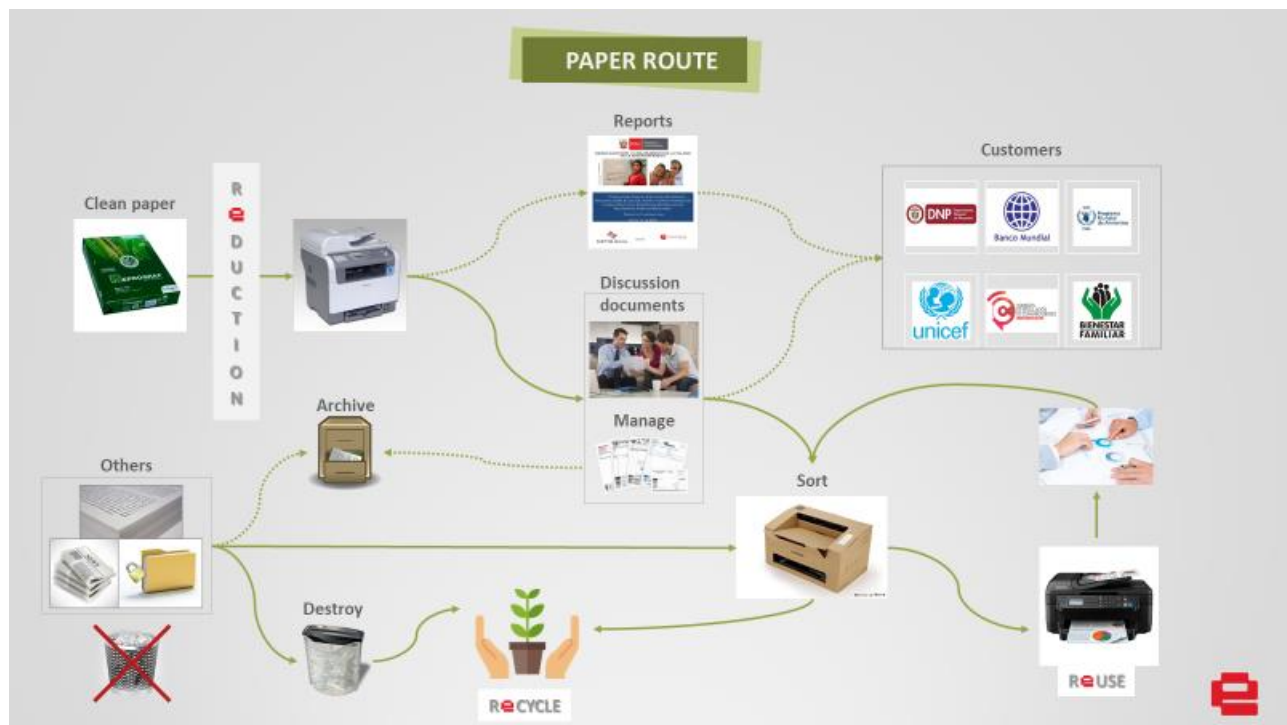
Monitoring of electricity, water and paper consumption. This action will be under the responsibility of the Firm's Administrative Director.

4.5.3 Action 2. Separation at source

Formalization, at the company's facilities, of the processes of separation at the source and management of waste that may involve greater risks, specifically batteries, toner and electronic waste. This action is under the responsibility of the systems area.

4.5.4 Action 4. Paper path

Paper management process in the firm's facilities, to reduce its use and promote its reuse whenever possible. The following image illustrates this strategy.



Source: In-house

4.6 SOCIALIZATION OF THE ENVIRONMENTAL POLICY



PRINCIPLES OF THE ENVIRONMENTAL MANAGEMENT POLICY



conometría accepts that its activities have an effect on the environment and therefore adopts the following principles as part of its Environmental Management Policy:

Resources



Efficient use

It is the use of supplies in the company in ways that achieve their maximum utilization, in accordance with practices accepted as environmentally friendly.



Proper handling

Collection or storage of waste in a manner that does not generate contamination risks within the company and in a way that facilitates its adequate reuse or disposal.



Adequate disposal

Delivery of the company's waste to suitable third parties for disposal or use.

Objectives:



Continuously improve the company's environmental performance under a preventive approach, based on the control of its processes and the participation of its employees.



To reduce the consumption of inputs and prevent the generation of solid waste, and to give the latter appropriate management for reuse, recovery of parts, recycling, treatment and final disposal.

Environmental Policy Actions:



Disclose and strictly comply with current environmental legislation.

Identify the budgetary needs for the development of the defined strategies and allocate the necessary resources for their development.



Promote knowledge dissemination practices that strengthen the culture of resource care in our employees.

Periodically update and publish the company's environmental policy and commitments. Disclose and strictly comply with current environmental legislation.



Monitor monthly consumption of paper, water, electricity, waste generation, noise levels and temperature, defining actions to reduce them to efficient levels.

Define strategies for the best environmental performance of the company, setting goals and analyzing their results periodically.



These include: paper route, implementation of energy-saving light bulbs and toilets, waste separation bins, among others.

THEMATIC AXIS IV: SOCIALIZATION OF THE ANTI-CORRUPTION POLICY

Chapter 5

ANTI-CORRUPTION POLICY

5.1 RATIONALE

Econometría S.A. has promoted from its actions, and in line with its human rights policy, the protection of human rights, the prohibition of child labor, the exaltation of workers' rights, the care and protection of the environment and the non-tolerance of collusion and corruption practices in any of its manifestations and contexts.

Econometría S.A. finds an opportunity to strengthen its alliances and presence in other countries and to seek other scenarios that allow it to reach new environments, not only as a business opportunity, but also to adopt new practices that contribute to the construction of a company that is appreciated in a global environment for its corporate responsibility.

In pursuit of this objective, and as was also established in the other thematic axes, since 2016 Econometría S.A. requested to be included as part of the member companies of the United Nations Global Compact, which is an "international initiative that promotes implementing 10 universally accepted Principles to promote sustainable development in the areas of Human Rights and Business, Labor Standards, Environment and Anti-Corruption in the activities and business strategy of companies" (Global Compact, 2018). These principles are framed in declarations signed by member countries of the United Nations:

1. Human Rights: Principles derived from the Universal Declaration of Human Rights (UDHR) of the United Nations (1948) and seek to promote, fulfill and guarantee the enjoyment and exercise of Human Rights.
2. Labor Standards: Principles derived from the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work (1998) and seek to ensure that social progress goes hand in hand with economic progress and development.
3. Environment: Principles derived from the Declaration of Principles and an International Plan of Action (Agenda 21) and seek sustainable development and the promotion of an economically, socially and environmentally sustainable future.

4. Fight against corruption: Principles derived from the United Nations Convention against Corruption (UNCAC) and seek to prevent, detect, punish and eradicate corruption in public functions and related activities.

5.2 PRINCIPLES OF THE ANTICORRUPTION PROGRAM

Econometría S.A. understands corruption as defined by the Organization for Economic Cooperation and Development (OECD) as "the use of power to divert the management of public and private affairs for private gain". Corrupt practices are understood as those that go against Integrity:

- Bribes
- Misappropriation of resources
- Influence peddling;
- Abuse of functions;
- Illicit enrichment;
- Laundering of proceeds of crime;
- Concealment of proceeds of crime
- Obstruction of justice

Econometría S.A. promotes the appropriation of practices aimed at preventing potential corruption risks. In this regard, the following priority actions have been identified:

- ✓ Transparent information management
- ✓ Internal audit processes
- ✓ Labor policy
- ✓ Accountability processes
- ✓ Control of receipts and expenditures for gifts, entertainment and travel
- ✓ Prohibition of political contributions;
- ✓ Guidelines for donations and sponsorships
- ✓ Communication and training to the firm's personnel
- ✓ Whistleblower support (whistleblower and defendant protection)
- ✓ Appropriate disciplinary measures
- ✓ Transparent relationship with the official entities that act as contractors of the firm. This translates into respect for the rules on public procurement, and the refusal to participate in pacts and collusions that may affect competition in the awarding of these contracts.
- ✓ Instructing the firm's employees and contractors to disclose any conflict of interest that may affect their independence in the work performed.

- ✓ Periodic reviews and actions to update and improve the Compliance Program.

5.3 REGULATORY FRAMEWORK

The following table summarizes the rules and agreements that guide the actions of Econometría Consultores' Anti-Corruption Program:

Table 5.1 - Standards and agreements relevant to the Anti-Corruption Program

Self-Regulatory Initiatives	Business Principles for Countering Bribery	<p>An initiative of Transparency International and Social Accountability International to provide business people with a practical tool to prevent and combat bribery:</p> <ul style="list-style-type: none"> - The company shall prohibit bribery in any form, whether direct or indirect. - The company will commit to implement an Anti-Bribery Program. The Program will represent the company's anti-bribery efforts including values, code of conduct, internal and external communication, training, guidance, supervision, internal controls, monitoring and assurance. <p>These Business Principles are based on a commitment on the part of the Board of Directors to the core values of integrity, transparency and accountability. Companies based on trust, in which bribery will not be tolerated.</p>
	Global Compact	The tenth principle of this co-responsibility initiative, promoted by the United Nations, establishes that "businesses should work against corruption in all its forms, including extortion and bribery".
	ACP	Global anti-corruption principles and practices. The Alliance Against Corruption Initiative. It arises from the efforts of the International Chamber of Commerce, the Organization for Economic Cooperation and Development (OECD), Transparency International, the United Nations Global Compact and some financial institutions. The fundamental principles are the prohibition of corruption in the company in any form and the company's commitment to implement and sustain an effective anti-corruption program.
	Rules of Conduct of the International Chamber of Commerce	The International Chamber of Commerce is the business organization that represents business interests worldwide. Among its activities is the development of rules and codes of conduct that regulate business activities at the international level, one of which is the Rules against Extortion and Bribery in International Transactions, which seeks to eliminate bribery and extortion through a combination of public action and private initiative.
	FTSE4Good Index Series	Seeks to create market incentives that drive improvements in business conduct on a variety of issues, including corruption and bribery. This index, produced by FTSE The Index Company, is voluntary and is geared towards values such as transparency, integrity and accountability. It works to provide clearer information to investors about the degree of each company's commitment to these principles.
	Extractive Industries Transparency Initiative	Created by a coalition of governments, companies, civil society organizations, investors and international organizations from various countries around the world, it promotes the improvement of governance indexes in countries rich in natural resources through transparency and accountability.
Regulatory Framework	Inter-American Convention against	It constitutes a regional reference framework, focused on the performance of the public sector and its officials. It was ratified by Colombia through Law 412 of 1997. It allowed the criminalization of transnational bribery in Colombia in 1999. The purposes of the Convention are:

	Corruption -OAS, 1996-	<p>- Promote and strengthen the development of the necessary mechanisms to prevent, detect, punish and eradicate corruption by each of the States Parties,</p> <p>- Promote, facilitate and regulate cooperation among the States Parties, in order to ensure the effectiveness of measures and actions to prevent, detect, punish and eradicate acts of corruption in the exercise of public functions and acts of corruption specifically related to such exercise.</p>
	United Nations Convention Against Corruption	Signed in December 2003, ratified by Colombia through Law 970 of 2005, and deposited with the United Nations General Secretariat in October 2006. This Convention seeks to encourage signatory countries to adopt tough anti-bribery policies and makes explicit reference to the importance of including the private sector in the fight against corruption. International commitments to legal development and compliance are becoming increasingly committed and aligned with the enactment of laws and regulations to combat socio-economic bribery.
	Convention on Combating Bribery of Foreign Public Officials in International Business Transactions	Issued in 1997 by the Organization for Economic Cooperation and Development - OECD. "It is an international agreement signed by countries that establishes measures to deter, prevent and penalize individuals and companies that promise, give or cover up bribes to foreign public officials involved in international business transactions.() It seeks to prevent bribery acts in international business transactions of the signatory countries and promotes the establishment and imposition of sanctions on public servants, individuals, companies and professionals who cover up or participate in an act of this nature."
	Action Statement on Bribery and Officially Supported Export Credits	OECD Statement on Bribery for Multinational Agencies and Foreign Credit Agencies, issued in 2006. It arose as a response to the 1997 Convention and deepens the fight against bribery in international trade transactions.
	Conventions and legal instruments of the Organization for Economic Co-operation and Development OECD	Since the end of 2011, Colombia has taken steps to become a participating member of the OECD Investment Committee, adhering to the guidelines for multinational companies, establishing the National Contact Point (NCP) and making progress in the adoption of the conventions and legal instruments of this organization to become a full member.
	The Colombian Penal Code Law 559 of 2000	It typifies and punishes some relevant conducts. However, it does not yet cover all cases of bribery, as it focuses on the activity of public officials and those who testify in judicial proceedings: Transnational bribery, passive Bribery, Bribery by giving or offering, Concussion.
	Anti-Formalities Law - Law 962 of 2005	It establishes "fundamental guidelines of the policy for the rationalization of formalities, which guide the actions of the Public Administration in the relations of the citizen-entrepreneur with the State at its different levels, for the exercise of activities, rights or fulfillment of obligations".
	Anti-Corruption Statute - Law 1474 of 2011	This regulation establishes provisions aimed at strengthening the mechanisms for the prevention, investigation and punishment of acts of corruption and the effectiveness of public management control. The most important elements of the Anti-Corruption Statute that pertain to the private sector are: Private corruption, Unfair administration, Agreements restricting competition, Ineligibility for corruption, Revolving door, Political campaign financing, Professional secrecy, Influence peddling, Liability of legal persons, Transnational bribery, Participation against corruption.

	Law on Transparency and Right of Access to Public Information Law 1712 of 2014.	Regulates the right of citizens to receive a response to requests for access to public information. It is based on the Model Law on Access to Information of the Organization of American States (OAS). It also promotes the fundamental right to receive a response to requests for access to public information and the state's duty to make this information visible and actively promote it without the need for prior request.
	Law 1778 of 2016, whereby rules are issued on the liability of legal persons for acts of transnational corruption and other provisions are issued in the fight against corruption.	This law establishes the administrative liability of legal entities, a sanctioning regime for legal entities that incur in the typified conducts, establishes the procedure through which the SuperSociedades will determine the liabilities of legal entities and establishes disqualifications for contracting political campaign financiers, among other rules.
	External Circular of the Superintendence of Corporations: Guide aimed at implementing business ethics programs for the prevention of the conducts provided for in art 2 of Law 1778 of 2016.	"The Guide contains administrative instructions related to the promotion of transparency and business ethics programs, as well as internal audit, anti-corruption and transnational bribery prevention mechanisms, in the context of Law 1778 of 2016." The Guide also provides a scope, different definitions, the principles of the business ethics program (including senior management commitment to prevent transnational bribery, risk assessment related to transnational bribery, the business ethics program, the need for a compliance officer, the principle of due diligence, monitoring and supervision of compliance and business ethics policies, disclosure of compliance and business ethics policies and communication channels".

Source: Universidad Externado de Colombia; Transparencia por Colombia
(Transparency International Chapter (2015): Fourth National Survey on anti-bribery practices in Colombian companies. Transparency Notebook No. 23

5.4 RISKS AND PREVENTIVE ACTIONS

Econometría S.A. identifies the following risks related to corruption, which may be associated with the development of its normal activities.

Table 5.2 - Risks and preventive actions of the Anti-corruption Program

CORRUPTION RISK IDENTIFICATION				RISK CATEGORIZATION			CONTROLS			
PRACTICE	GENERAL DEFINITION	SPECIFIC RISK DESCRIPTION	RISK FACTOR	RISK LEVEL (1-3)	IMPACT OF RISK (1-3)	RISK ASSESSMENT (LEVEL X IMPACT) (1-9)	PREVENTIVE ACTION	CONTROL LEVEL (0-100%)	VALUE OF RESIDUAL RISK (0-9)	CORRECTIVE ACTIONS
Bribery	It is the offer, promise, authorization or acceptance of any undue monetary gift or any other benefit or advantage, in order to obtain or retain business or any other improper benefit or advantage; for example, those related to the awarding of contracts by public or private entities for the supply of goods or services.	Seek consideration for the firm by means of cash, donations, travel, entertainment, gifts, etc... For customers or potential customers.	Pressure or explicit request from the customer or potential customer.	1	3	3	To have and socialize the code of good governance and the guidelines for relations with other market agents.	95%	0,15	Review of the case to address the situation and provide feedback on preventive actions.
Collusion	To agree with another for the purpose of unlawfully altering the contractual procedure in order to obtain business.	Being invited by competitors to form a cartel or to develop strategies or actions that go against free competition.	Request to form a cartel.	2	3	6	To have and socialize the code of good governance and the guidelines for relations with other market agents.	95%	0,30	Review of the case to address the situation and provide feedback on preventive actions.

CORRUPTION RISK IDENTIFICATION				RISK CATEGORIZATION			CONTROLS			
PRACTICE	GENERAL DEFINITION	SPECIFIC RISK DESCRIPTION	RISK FACTOR	RISK LEVEL (1-3)	IMPACT OF RISK (1-3)	RISK ASSESSMENT (LEVEL X IMPACT) (1-9)	PREVENTIVE ACTION	CONTROL LEVEL (0-100%)	VALUE OF RESIDUAL RISK (0-9)	CORRECTIVE ACTIONS
		Intervening in the selection by submitting or obtaining other bids on behalf of third parties to justify the hiring of the firm. To influence the processes for the inclusion of conditions that favor Econometría only.	Failures in the contracting process.	2	3	6	Establish and apply criteria to limit the firm's participation in the development of ToR and processes.	95%	0,30	Review of the case to address the situation and provide feedback on preventive actions.
Influence peddling	Exerting undue influence on public servants or on the managers of private sector clients or partner or allied firms.	Inappropriate use of the relationships of members or allies of the firm.	Lack of knowledge of improper practices.	1	2	2	To have and socialize the code of good governance and the guidelines for relations with other market agents.	95%	0,10	Review of the case to address the situation and provide feedback on preventive actions.
Extortion	Demand of a bribe or payment under violence or intimidation.	Using information in Econometría's custody to extort money from someone.	Lack of communication channels to report this type of behavior. Inappropriate use of information.	1	2	2	Confidentiality clauses in labor contracts. Data processing policy. File management. Guidelines for relations with other market agents.	80%	0,40	Review of the case to address the situation and provide feedback on preventive actions.

CORRUPTION RISK IDENTIFICATION				RISK CATEGORIZATION			CONTROLS			
PRACTICE	GENERAL DEFINITION	SPECIFIC RISK DESCRIPTION	RISK FACTOR	RISK LEVEL (1-3)	IMPACT OF RISK (1-3)	RISK ASSESSMENT (LEVEL X IMPACT) (1-9)	PREVENTIVE ACTION	CONTROL LEVEL (0-100%)	VALUE OF RESIDUAL RISK (0-9)	CORRECTIVE ACTIONS
Abuse of functions	Committing or ordering arbitrary acts to the detriment of clients, potential clients or third parties.	Inappropriate use of confidential information.	Lack of clarity in the identification of confidential information. Failures in information management.	2	1	2	Confidentiality clauses in labor contracts. Data processing policy. File management. Guidelines for relations with other market agents.	80%	0,40	Review of the case to address the situation and provide feedback on preventive actions.
		Altering accounting information.	Lack of knowledge of regulations. Lack of review and control instances.	1	2	2	Compliance with IFRS regulations. Periodic training for the administrative team.	95%	0,10	Review of the case to address the situation and provide feedback on preventive actions.
		Altering resumes and supporting documentation to meet bidding requirements.	Failure to record the experience of personnel hired by Econometría, external consultants or allies.	1	2	2	Implementation of the resume system and its supports.	95%	0,10	Review of the case to address the situation and provide feedback on preventive actions.
Obstruction of justice	Destroying, modifying, directing, impeding, concealing or falsifying evidence; or it is considered that it	Failure to duly respond to a request	Lack of knowledge of the obligations	1	2	2	To have and socialize guidelines for the effective and	95%	0,10	Review of the case to address the

CORRUPTION RISK IDENTIFICATION				RISK CATEGORIZATION			CONTROLS			
PRACTICE	GENERAL DEFINITION	SPECIFIC RISK DESCRIPTION	RISK FACTOR	RISK LEVEL (1-3)	IMPACT OF RISK (1-3)	RISK ASSESSMENT (LEVEL X IMPACT) (1-9)	PREVENTIVE ACTION	CONTROL LEVEL (0-100%)	VALUE OF RESIDUAL RISK (0-9)	CORRECTIVE ACTIONS
	will induce co-defendants, witnesses, experts or third parties to give false information or behave in a disloyal or reticent manner; or when it impedes or hinders the performance of the proceedings or the work of the officials and other parties involved in the proceedings.	from surveillance and control authorities	before the competent authority. Not having the information organized or documented.				timely delivery of information to the competent authorities. File management.			situation and provide feedback on preventive actions.
Misappropriation of resources	Unfair administration: the de facto or de jure administrator, or partner of any incorporated or formed company, director, employee or advisor, who, for his own benefit or that of a third party, abusively disposes of the assets of third parties.	Breach of contract due to misuse of customer resources.	Uncontrolled power on the part of the authorizers of expenditure in Econometría or in temporary unions or consortiums, when applicable.	1	3	3	Periodically review authorizing officers' expenditure controls and limits. Include clauses in joint venture or consortium contracts on the administration of resources. Request compliance policies when resources are not directly administered.	95%	0,15	Review of the case to address the situation and provide feedback on preventive actions.
Laundering or concealment of proceeds of crime	It is the concealment or concealment of the illicit origin, source, location, disposition, movement or ownership of	Use in the firm's activities resources known to come from illicit activities.	Lack of knowledge about the origin of the resources of	1	3	3	Research protocol on the origins of clients' resources.	95%	0,15	Review of the case to address the situation and provide

CORRUPTION RISK IDENTIFICATION				RISK CATEGORIZATION			CONTROLS			
PRACTICE	GENERAL DEFINITION	SPECIFIC RISK DESCRIPTION	RISK FACTOR	RISK LEVEL (1-3)	IMPACT OF RISK (1-3)	RISK ASSESSMENT (LEVEL X IMPACT) (1-9)	PREVENTIVE ACTION	CONTROL LEVEL (0-100%)	VALUE OF RESIDUAL RISK (0-9)	CORRECTIVE ACTIONS
	property, with knowledge that such property is the proceeds of crime.		clients and/or allies. The firm is used as a front man.							feedback on preventive actions.

Source: Prepared by Econometría Consultores

5.5 POLICY ACTIONS

The actions of the Anticorruption Program are aimed at preventing the risks identified and are divided into the following groups

Figure 5.1 - Strategic process of actions of the Anticorruption Program

Code of Good Governance	Data processing policy	Expense Control
<ul style="list-style-type: none"> • Updating and socialization of the company's internal rules and regulations. • Guidelines for establishing relationships with other market agents. • Review of resumes and supports 	<ul style="list-style-type: none"> • Confidentiality clauses in agreements • File and data base management • Handling of data under confidentiality protocol in the framework of evaluations 	<ul style="list-style-type: none"> • Compliance with IFRS • Effective and timely delivery to competent authorities • Periodic training to administrative team

Source: Prepared by Econometría Consultores

The progress to date of each of these actions is presented below:

5.5.1 Action 1. Code of Good Governance

- ✓ The Code of Good Governance was updated and presented to the members of the Board of Directors and the Shareholder's Meeting for approval.
- ✓ The management team has established supplier relationship guidelines that are used for all contracts that are made
- ✓ The proposal team has established a protocol for the review of all resumes submitted by external consultants.

5.5.2 Action 2. Data processing policy

- ✓ All labor and service contracts with suppliers include information confidentiality clauses.
- ✓ The cross-cutting support team established a protocol for the anonymized handling of the databases and the guarantee of confidentiality of the information collected in the consulting projects.

5.5.3 Action 3. Expense Control

- ✓ Econometría's team has attended all tax audit visits made by the DIAN in a timely manner.
- ✓ Econometría's accounting is based on IFRS standards.
- ✓ Training

The trainings carried out this year that contribute to the training of administrative personnel in order to build capacities for the established actions are as follows:

NAME	POSITION	TRAINING	ENTITY
Liliana Casas	Accountant	Update on Tax Jurisprudence and Doctrine	ASTAF CONSULTORES
		2019 Income Tax Return Forum	ASTAF CONSULTORES
		Strategy and legal tax protection during the economic emergency	ASTAF CONSULTORES
		Key aspects to take into account for the closing of the 2020 financial statements	ASTAF CONSULTORES
		Practical workshop on electronic invoicing	HELISA
		Key aspects to take into account for the closing of financial statements	HELISA
		Exogenous Information	HELISA
		Fundamental aspects for the preparation of the national media	HELISA
		Financial Statements Report	Superintendence of Corporations
		Business intelligence tools	EDX Platform
Maira Quiroz	Financial and Administrative Assistant	Financial markets from yale university	Yale University
Margarita Moreno	Human Talent Manager	Diploma in Legal and Administrative Management of the Human Talent	LEGIS
		Labor Summit 2020	ACRIP
		Seminar on Legal, Occupational Health and Organizational Culture Aspects of Remote Work, Teleworking and Flexible Work Modes	Universidad del Rosario

5.6 SOCIALIZATION OF THE ANTI-CORRUPTION POLICY



Política Anticorrupción

Econometría Consultores understands corruption as "the use of power to divert the management of public and private affairs for personal gain".

The following are understood as corrupt practices:

- 1 Bribes
- 2 Misappropriation of resources
- 3 Influence peddling
- 4 Abuse of functions
- 5 Illicit enrichment
- 6 Laundering the proceeds of crime
- 7 Concealment of proceeds of crime
- 8 Obstruction of justice



Best practices:

- Transparent information management
- Internal audit processes
- Labor policy
- Accountability processes
- Control of gift, entertainment and travel expenses
- Prohibition of political contributions;
- Guidelines for donations and sponsorships
- Communication and training to the firm's personnel
- Support for whistleblowing (whistleblowers)
- Appropriate disciplinary measures
- Periodic reviews and actions to update and improve the Compliance Program.

