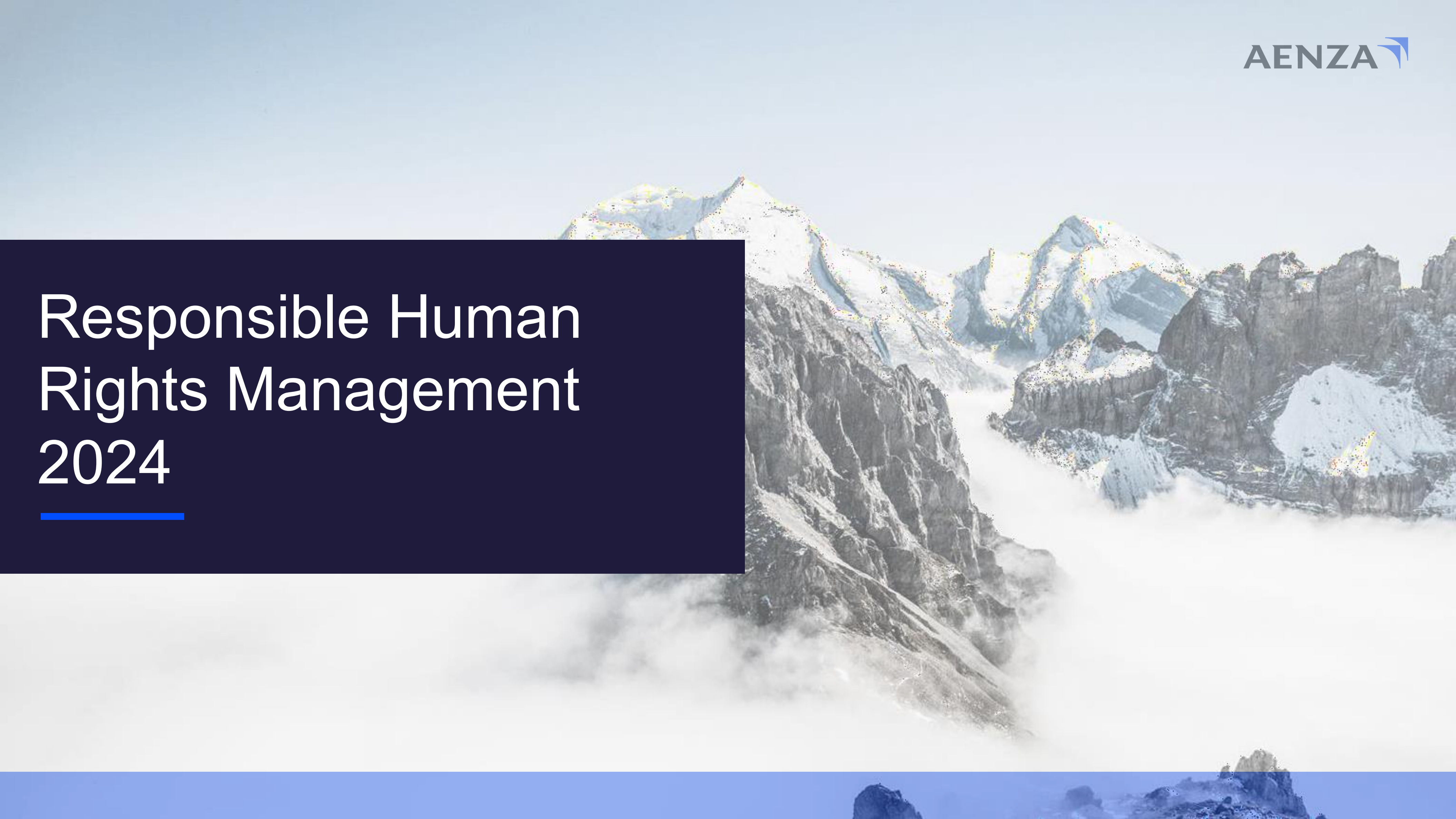


Responsible Human Rights Management 2024



This brochure complements the information presented in the 2024 Consolidated Report, in the Human Rights section. Our goal is to provide a deeper look into the key topics that strengthen AENZA's sustainability efforts. This initiative aligns with international standards, such as the Corporate Sustainability Assessment (CSA), and seeks to create value for both our stakeholders and the company.

With over 90 years of experience, AENZA is a leading infrastructure company with operations in Peru, Colombia, and Chile. Its diversified portfolio spans key sectors such as transportation, energy, construction, and real estate. Among its main projects are Line 1 of the Lima Metro, three highway concessions, a water treatment plant, and two hydrocarbon production lots that account for more than 10% of national production. In addition, the company manages terminals and a gas plant, leads major projects such as the new Jorge Chávez Airport, and has delivered nearly 20,000 affordable housing units. With a team of over 11,750 employees, AENZA promotes high standards of excellence and maintains a strong commitment to sustainability, reflected in its inclusion in the S&P/BVL Peru General ESG Index.

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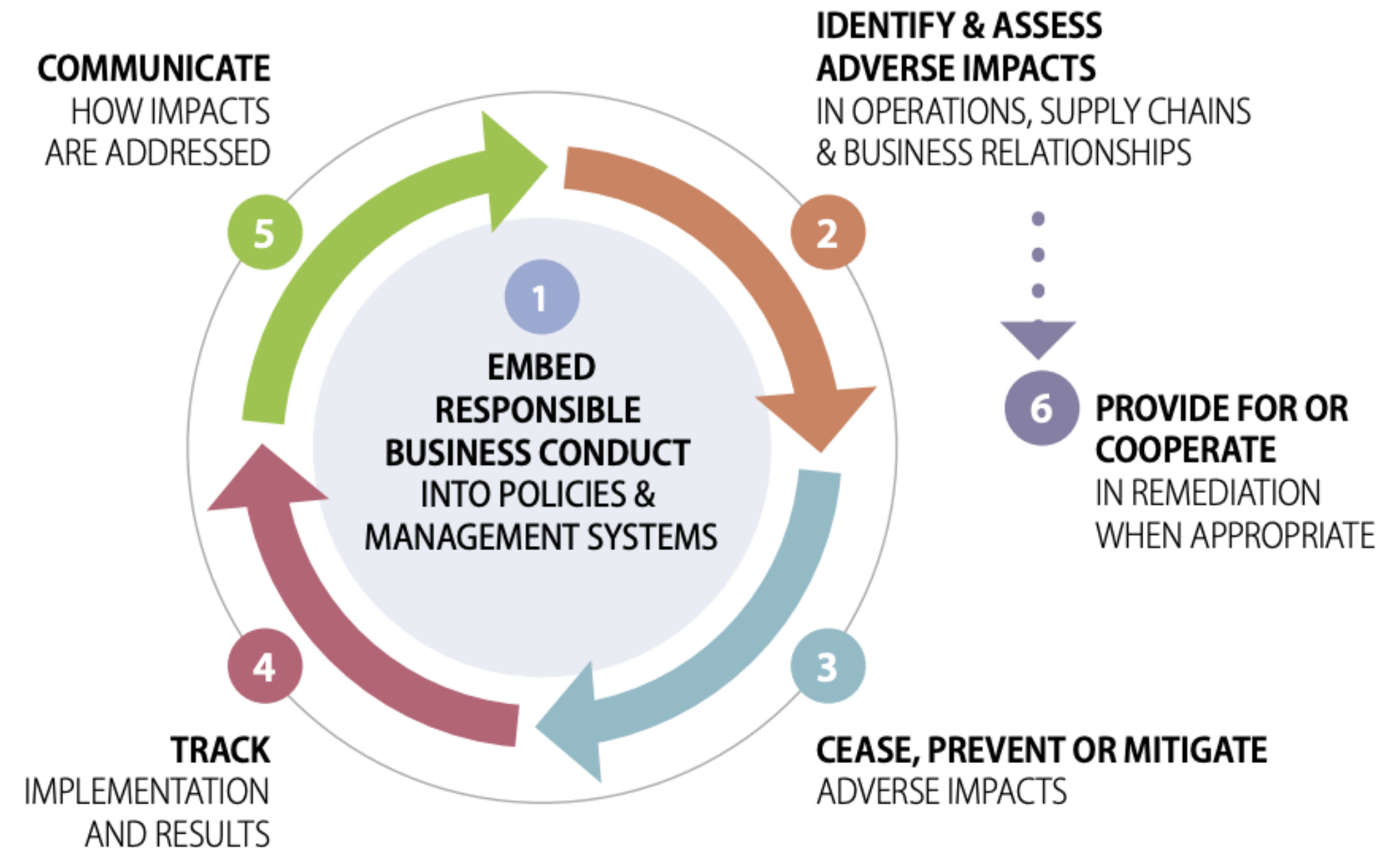
**Management Model:
Respect in Every
Action**

Management Model: Respect in Every Action

At AENZA, our commitment to human rights is strong and cross-cutting. We have a management model aligned with key national and international frameworks, such as:

The United Nations Guiding Principles on Business and Human Rights, The OECD Due Diligence Guidance for Responsible Business Conduct, and Peru's National Action Plan on Business and Human Rights 2021–2025.

FIGURE 1. DUE DILIGENCE PROCESS & SUPPORTING MEASURES



Source: OECD Due Diligence Guidance for Responsible Business Conduct, 2018.

Committed Leadership: Governance and Decision-Making

To ensure our commitment to human rights, we have designed a governance structure that involves all levels of the organization, from the Board of Directors to the operational units across our business lines: engineering and construction, energy, infrastructure, and real estate.

Two Board committees play a strategic role in overseeing matters related to human rights:

- ❖ **Risk and Compliance Committee:** oversees key business risks and ensures compliance with internal and external regulations, focusing on the identification, assessment, and mitigation of risks.
- ❖ **Talent and ESG Committee:** guides corporate sustainability policies and strategies, with a cross-cutting focus on people's well-being and respect for their rights.

Committed Leadership: Management at the Corporate Level

At the management, we also have corporate committees responsible for coordinating and overseeing the macroprocesses we have defined across the organization. These bodies, composed of corporate level process leaders and representatives from our business units, meet regularly to ensure aligned and effective management, as well as to monitor priority plans and actions. In human rights matters, leadership lies primarily with the Human Management Committee, with coordinated participation from the Ethics, Diversity, SSOMA (Safety, Occupational Health, and Environment), and Social Management Committees.

Corporate Human Management Committee: leads a comprehensive approach to talent management based on cross-cutting processes that accompany employees throughout their careers, promoting their development, well-being, and a positive work environment.

Corporate Ethics Committee: ensures integrity, transparency, and compliance by overseeing the implementation of the Ethics and Compliance Program, assessing ethical risks, addressing reports through the Ethics Channel, and promoting a corporate culture grounded in responsibility, trust, and the prevention of misconduct.

Committed Leadership: Management at the Corporate Level

Corporate Diversity Committee: promotes an inclusive and discrimination-free work environment, fostering equal opportunities through training, prevention policies, inclusive leadership, and equitable benefits for all employees.

Corporate Occupational Health and Safety Committee: oversees prevention, risk management, and health promotion initiatives at AENZA, investigating incidents, sharing best practices, and ensuring high safety standards in line with national regulations and international benchmarks.

Corporate Social Management Committee: develops strategies to prevent social conflicts and strengthen relationships with communities, formulating policies, standards, indicators, and programs that promote community development, health, well-being, and environmental sustainability.

These committees work in coordination to ensure that our operations respect and promote human rights, both within the AENZA Group and in our relationships with communities, suppliers, and other strategic partners.

Committed Leadership: Management at the Corporate Level

Under the leadership of the corporate committees, we carry out actions that ensure respect for human rights through the following areas of action:

Supervision and compliance: we monitor compliance with national and international standards and assess the risks and impacts that our activities may have on human rights.

Policy development: we design, review, and update our corporate policies on topics such as working conditions, diversity, inclusion, and ethics. We also establish codes of conduct for employees and strategic partners.

Due diligence: we implement processes to identify, prevent, mitigate, and account for real or potential impacts on human rights. We also promote respect for labor rights throughout our supply chain.

Training and organizational culture: we promote internal training on human rights at all levels of the company and foster a culture based on respect, equity, and inclusion.

Committed Leadership: Management at the Corporate Level

Grievance and remediation mechanisms: we provide confidential and accessible reporting channels for employees, contractors, and communities, ensuring that every complaint is investigated and managed responsibly.

Transparency and accountability: we clearly and regularly report our progress, commitments, and challenges in human rights, integrating them into our sustainability management.

Strategic advisory: the committees provide recommendations to senior management regarding risks, opportunities, and decisions related to human rights.

In this way, we guide our management toward objectives and actions implemented across all levels of AENZA and its business units.



Institutional Commitment

Humans Right Policy

All our actions are framed within commitments made at the highest level. AENZA's commitments, as well as the expected behaviors of our employees and strategic partners, are set out in our various codes, regulations, policies, and guidelines.

In our Human Rights Policy, AENZA has adopted nine commitments that apply to all our business units, under a cross-cutting approach throughout the organization.

[AENZA Human Rights Policy](#)

I. Introducción y objetivo

En AENZA consideramos el respeto de los derechos humanos contemplados en las normas nacionales e internacionales como un aspecto fundamental y no negociable de la forma en la que ejecutamos nuestro negocio.

Esta política reúne los compromisos corporativos adoptados por la compañía en materia de protección de derechos humanos y aplica a todas las empresas que componen la corporación y a todos sus miembros.

II. Compromisos y Lineamientos

1. Respetamos los derechos humanos reconocidos en el Pacto Mundial de las Naciones Unidas.
2. Nuestro compromiso con los derechos humanos está alineado a nuestro compromiso con cumplir las leyes aplicables en los lugares donde operamos.
3. No admitimos ningún tipo de trabajo infantil, ni forzoso, y rechazamos cualquier práctica vinculada con la trata de personas.
4. Reconocemos el derecho de nuestros colaboradores a la privacidad de datos, la libre asociación, negociación colectiva y al ejercicio de los derechos inherentes de las organizaciones que conformen, dentro del marco establecido por las normas aplicables.
5. Respetamos la diversidad y rechazamos cualquier forma de discriminación por razones de edad, género, estado civil, nacionalidad, religión, discapacidad, etnia o cualquier otra condición o circunstancia personal.
6. Trabajamos activamente para cerrar la brecha de género y promover un esquema remunerativo equitativo entre nuestros trabajadores.
7. Nos comprometemos a implementar procedimientos de supervisión y control, que permitan identificar y mitigar posibles situaciones de riesgo que puedan vulnerar Derechos Humanos.
8. Nos comprometemos a fomentar el bienestar personal y organizativo, de este modo, pretendemos promover la conciencia de riesgo y el comportamiento responsable de todos.
9. Nos comprometemos a difundir esta política e incentivar su cumplimiento entre nuestros proveedores y contratistas.

Diversity, Inclusion, and Equity Policy

At AENZA, we ensure that all our employees receive equal treatment, opportunities, and development.

Our commitments are reflected in the Diversity, Inclusion, and Equity Policy:

[AENZA Diversity, Inclusion, and Equity Policy](#)

I. Introducción y objetivo

En AENZA reafirmamos nuestro compromiso de garantizar que todos nuestros trabajadores reciban igualdad de trato, oportunidades y desarrollo, sintiéndose libres de cualquier tipo de discriminación.

El objetivo de la presente Política es establecer los principios de actuación para los trabajadores y su relación también con clientes y proveedores, a fin de promover una cultura organizacional y un ambiente laboral diverso, equitativo e inclusivo. Esta política aplica a todas las empresas que componen la corporación y a todos sus miembros.

II. Compromisos y Lineamientos

1. Construir una cultura corporativa que tenga como pilar fundamental el respeto y la protección de la dignidad de todas las personas.
2. Velar por la existencia de un ambiente laboral que integre a las personas independientemente de sus condiciones, características u orientaciones particulares.
3. Garantizar que todas las personas tengan acceso a las mismas oportunidades, independientemente de cualquier atributo personal, y luchar activamente contra la brecha de género.
4. Rechazar cualquier forma de discriminación y acoso, como las que tienen su causa en atributos como la raza, el sexo, la orientación sexual, la identidad de género, o la discapacidad, credo, ideales políticos, entre otros.
5. Fomentar la existencia de equipos de trabajo diversos, integrados por personas con distintas formas de pensar, origen, creencias religiosas, convicciones, experiencias, formación académica y capacidades físicas.
6. Fomentar el intercambio alturado de opiniones, respetar la diferencia de puntos de vista y generar espacios donde los equipos puedan expresarse y ser escuchados, valorados y respetados.
7. Brindar capacitaciones y promover el conocimiento en materia de no a la discriminación y acoso en el centro de trabajo.
8. Poner a disposición de los trabajadores canales adecuados de denuncia y promover su uso frente a prácticas o hechos que atenten contra los compromisos presentes en esta política.
9. Imponer sanciones correspondientes de presentarse un caso de discriminación o acoso.

Corporate Policy for the Prevention and Sanction of Sexual Harassment

We also have a Policy for the Prevention and Sanction of Sexual Harassment, which sets out prevention and disciplinary guidelines to ensure a safe work environment:

[AENZA Corporate Policy for the Prevention and Sanction of Sexual Harassment](#)

1. Introducción, Objetivo y Alcance

En AENZA estamos comprometidos con la creación de un ambiente de trabajo, seguro y respetuoso. El hostigamiento o acoso sexual es una violación grave de los derechos de nuestros colaboradores por lo que implica un comportamiento inaceptable en nuestra organización, posición que nos permite ir en línea con la legislación vigente referida a la Prevención y Sanción del Hostigamiento o Acoso Sexual en el entorno laboral.

Esta política tiene como objetivo principal establecer compromisos y lineamientos generales para la prevención, investigación y sanción de dicho comportamiento, garantizando un entorno laboral en el que todos los colaboradores sean tratados con dignidad y respeto, acorde a nuestro **Código de Conducta de Negocios de AENZA**. Lo que nos permite lo siguiente:

Establecer pautas claras para prevenir y sancionar el hostigamiento o acoso sexual en el lugar de trabajo.

- Fomentar la conciencia y la educación sobre el hostigamiento o acoso sexual entre todos los colaboradores.
- Proporcionar un proceso de denuncia confidencial y efectivo para las víctimas de hostigamiento o acoso sexual.
- Tomar medidas disciplinarias apropiadas contra los individuos que perpetren el hostigamiento o acoso sexual.

Este documento se enmarca en los compromisos y lineamientos asumidos en la **ANZ-ESG-PO-003 Política de Diversidad, Inclusión y Equidad**.

Esta política aplica para AENZA S.A.A, Unidades de Negocio y sus empresas/subsidiarias en Perú, Chile y Colombia. Aplica también a los Joint Ventures, Consorcios, Asociaciones y cualquier otra entidad que forme parte o esté asociada a las diversas empresas de la compañía, siempre que estas hayan adoptado como propias las políticas de AENZA S.A.A

2. Compromisos y Lineamientos

- 2.1. AENZA no tolera ningún acto de hostigamiento o acoso sexual, ya sea verbal, físico, visual u otro acto de connotación sexual o sexista. Todos los colaboradores deben tratar a sus colegas con respeto y consideración en todo momento.
- 2.2. AENZA se obliga a proporcionar capacitaciones regulares sobre el hostigamiento o acoso sexual y promover la conciencia entre los colaboradores sobre lo que constituye el hostigamiento o acoso sexual y cómo prevenirlo.
- 2.3. AENZA establece un proceso de denuncia confidencial y seguro para las víctimas de hostigamiento o acoso sexual. Los colaboradores que experimenten o sean testigos de hostigamiento o acoso sexual tienen la responsabilidad de informarlo a su supervisor, al área de Gestión Humana o a través del canal designado.

Social Management Policy

At AENZA, we are committed to promoting social development in the areas where we operate.

Our Social Management Policy outlines the principles that guide our engagement with the communities and areas of influence of our projects and operations:

[AENZA Social Management Policy](#)

I. Introducción y objetivo

En AENZA buscamos promover activamente el desarrollo social en los lugares donde operamos a través de distintas estrategias de integración y articulación con actores locales.

El objetivo de la presente Política es establecer los principios orientadores para gestionar la gestión de comunidades y grupos de interés en zonas de influencia de nuestros proyectos y operaciones, y aplica a todas las empresas que componen la corporación y a todos sus miembros.

II. Compromisos y Lineamientos

1. Incorporar el criterio social a la toma de decisiones estratégicas y de negocio de la compañía.
2. Convertirnos en agentes generadores de desarrollo sostenible y bienestar de las comunidades en nuestras áreas de influencia, y ser reconocidos por ello.
3. Respetar las obligaciones legales y los compromisos asumidos en temas sociales con nuestros distintos grupos de interés.
4. Interactuar con los grupos de interés relevantes y potencialmente afectados por nuestras operaciones para la evaluación y el manejo de los impactos generados.
5. Evaluar y generar planes de mitigación para riesgos de origen social, para contribuir con el desarrollo normal de nuestras operaciones.
6. Entablar relaciones de confianza y respeto con los distintos actores de interés en las zonas de incidencia de nuestros proyectos y operaciones, y liderar acciones de articulación interinstitucional en pro del desarrollo sostenible en nuestras zonas de influencia.
7. Reconocer la diversidad existente en las comunidades locales y respetar sus derechos culturales.
8. Promover activamente oportunidades de contratación de mano de obra local, gestionando mecanismos para que esto suceda.
9. Mantener canales de comunicación activos para informar a los distintos actores locales acerca del desarrollo de nuestra actividad.
10. Atender y gestionar consultas, quejas, reclamos y solicitudes, a través de un mecanismo eficiente.
11. Difundir esta política e incentivar su cumplimiento entre nuestros proveedores y contratistas.

Digital Disconnection Policy

We also have the Digital Disconnection Policy, which sets out clear provisions to ensure that all employees enjoy adequate rest time and are not required to perform work outside their regular working hours.

[AENZA Digital Disconnection Policy](#)

1. Objetivo y Alcance

El presente documento busca establecer las reglas de desconexión digital en función a cada tipo de trabajador con la finalidad de garantizar un adecuado descanso del ambiente laboral que se genera en el lugar de habitación producto del uso de tecnologías de la información, tal como ha sido regulado por el Decreto de Urgencia N° 127-2020 y en la Primera Disposición Complementaria Modificatoria del Decreto Supremo N° 004-2021-TR.

Se entiende por tecnologías de la información las siguientes: WhatsApp, Teams, Zoom, correo electrónico, entre otros. No obstante, la presente lista no es limitativa sino enunciativa a efectos de ejemplificar las herramientas virtuales.

Aplica a:

- Trabajadores sujetos a la jornada máxima: En este grupo de trabajadores se encuentran aquellos de naturaleza fiscalizable que realizan su labor bajo la modalidad de trabajo remoto, cumpliendo para tal efecto una jornada de trabajo.
- Trabajadores no sujetos a la jornada máxima: Se encuentran comprendidos en este grupo aquellos trabajadores que realizan labores bajo la modalidad de trabajo remoto y, cuya labor no está sujeta a fiscalización inmediata, sino más bien al cumplimiento de objetivos.

Este documento aplica para AENZA S.A.A, Unidades de Negocio y sus empresas/subsidiarias: AENZA SERVICIOS CORPORATIVOS S.A.C., CUMBRA PERÚ S.A., CUMBRA INGENIERÍA S.A., ECOLOGIA Y TECNOLOGIA AMBIENTAL S.A.C., UNNA INFRAESTRUCTURA S.A.C., UNNA TRANSPORTE S.A.C., UNNA ENERGIA S.A., VIVA NEGOCIO INMOBILIARIO S.A.C., INMOBILIARIA ALMONTE S.A.C. Aplica también a los Joint Ventures, Consorcios, Asociaciones y otros que conformen o de los que sean parte las diversas empresas de la compañía, siempre que estos hayan hecho suyas las políticas de AENZA S.A.A.

2. Criterios de horarios de Desconexión Digital

Para el caso de trabajadores sujetos a la jornada máxima legal, tendrán derecho a la desconexión digital una vez culminada su jornada laboral, dependiendo del régimen laboral en que se encuentren. Superado dicho periodo no se podrá exigir labores fuera del horario de trabajo ni realizar ningún tipo de coordinación laboral.

Para el caso de trabajadores no comprendidos en la jornada máxima legal, el tiempo de desconexión deberá ser por lo menos de 12 horas continuas en un periodo de 24 horas, por lo que se recomienda que a partir de las 20.00 horas hasta las 8.00 horas no se realice ningún tipo de coordinación laboral a través de ningún mecanismo de comunicación.

En ambos grupos de trabajadores se deberá tener en consideración que en caso se produzca alguna emergencia o necesidad urgente debidamente sustentada, estos deberán ponerse a disposición del empleador de forma excepcional a fin de coadyuvar en las labores que le correspondan.

Additionally, at AENZA we have various corporate documents that set out the commitments, principles, and guidelines that guide our actions across the entire Group:

- ✓ Business Code of Conduct
- ✓ Anti-Corruption Policy
- ✓ Responsible Business Practices Policy
- ✓ Sustainability Policy
- ✓ Occupational Health and Safety Policy
- ✓ Environmental Policy
- ✓ Comprehensive Risk Management Policy
- ✓ Donations Procedure
- ✓ Supplier Code of Conduct
- ✓ ESG Brochure
- ✓ Human Rights Management Assessment
- ✓ Grievance Management Policy
- ✓ Internal Work Regulation
- ✓ Board Policy for Crime Prevention in Peru
- ✓ Guidelines for Conflict of Interest Declarations
- ✓ Corporate Management System Policy
- ✓ Internal Occupational Health and Safety Regulations
- ✓ SSOMA Culture Manual
- ✓ Occupational Health Plan
- ✓ Guidelines for Managing Complaints and Inquiries
- ✓ Information Security Policy
- ✓ Guidelines for Internet Use in the Workplace

[Corporate Policies | AENZA](#)



Due Diligence: Identification and Assessment of Human Rights Risks

Due Diligence: Identification and Assessment of Human Rights Risks

At AENZA, we promote respect for human rights as an essential part of our way of working. This commitment is reflected across various areas and processes of our daily operations, such as social management, human talent management, and regulatory compliance, among others. Each of these fronts incorporates concrete mechanisms to identify and protect individuals and groups who may be in situations of vulnerability or risk. At the corporate level, we manage human rights–related risks through a structured process that includes their identification, assessment, analysis, monitoring, and mitigation.

In 2024, the first self-assessment on human rights was conducted, leading to the development of the corporate document *Human Rights Management Assessment*, which includes key information on this area: human rights management at AENZA, evaluation of human rights management, labor rights, health and safety, non-discrimination and equality, rights of local communities, cybersecurity and data protection, governance and transparency, and workplace sexual harassment.

[Human Rights Management Assessment at AENZA](#)

Due Diligence: Identification and Assessment of Human Rights Risks

This first self-assessment allowed us to define categories of human rights risks and identify vulnerable groups, enabling us to act in a timely and effective manner across our operations. We have a solid and well-structured system that ensures our processes—from social to environmental and safety aspects—are designed to prevent, address, and mitigate any situation that may affect human rights.

This structure gives us the confidence to affirm that, at AENZA, we work every day to protect and respect human rights in all our activities.

Due Diligence: Identification and Assessment of Human Rights Risks

Categories of Human Rights Risks:

Labor Rights

- ❖ Child labor and forced labor
- ❖ Working hours
- ❖ Paid vacation and other social benefits
- ❖ Freedom of association and collective bargaining
- ❖ Fair and timely payment

Occupational Health and Safety

- ❖ Risk identification and assessment
- ❖ Personal protective equipment
- ❖ Training and capacity building

Non-discrimination and Equality

- ❖ Workplace discrimination and harassment
- ❖ Equal opportunity and workforce diversity
- ❖ Inclusive work environment

Rights of Local Communities

- ❖ Dialogue with communities
- ❖ Impact assessment and mitigation
- ❖ Grievance management and conflict resolution

Cybersecurity and Data Protection

- ❖ Protection of personal data
- ❖ Data breach management

Governance and Transparency

- ❖ Ethics and compliance
- ❖ Transparency and accountability
- ❖ Whistleblowing channels

Due Diligence: Identification and Assessment of Human Rights Risks **AENZA**

Categories of Human Rights Risks:

Workplace Sexual Harassment

- ❖ Prevention of sexual harassment
- ❖ Training
- ❖ Confidential and secure reporting channels
- ❖ Impartial investigations and corrective measures
- ❖ Support and resources for victims

Vulnerable Groups

In addition, six groups in situations of vulnerability have been identified in relation to the prioritized topics, which are associated with potential risks of human rights violations:

- Direct employees
- Third-party workers
- People with disabilities
- Clients
- Local communities
- Children

Due Diligence: Identification and Assessment of Human Rights Risks

Based on this categorization, a human rights risk matrix was developed using an analytical approach grounded in the **probability of occurrence and the severity of impact**. First, potential risks related to operations and the value chain were identified, drawing on international standards, local regulations, and stakeholder expectations. Each risk was then assessed considering the following:

Probability of occurrence: the likelihood of the risk materializing, based on the operational context, incident history, and level of exposure.

Severity of impact: the potential level of harm to human rights, considering the magnitude of damage, the scope of affected groups, and the difficulty of remediation.

The intersection of these two variables made it possible to identify risks associated with the 23 categories mentioned above, establishing an order of priority for management and response. The process also included identifying vulnerable groups that may be more affected—such as direct employees, third-party workers, local communities, and children—which helps guide the prevention, mitigation, and remediation measures related to each prioritized risk and category.

Human Rights Risk Matrix

General Aspect	Evaluated Aspect	Risk Description	Potentially Affected Human Right	Groups at Risk	Measures
Labor Rights	Child labor and forced labor	Directly or indirectly involving children or adolescents in work activities that violate their fundamental rights, whether within operations, in the supply chain, or through contractors.	Right to education, physical and mental health, protection from exploitation and abuse, integral development, and special protection for children (Articles 25.2 and 26 of the Universal Declaration of Human Rights).	Children	Human Rights Policy Human Rights Management Assessment Digital Disconnection Policy Policy on Remote Work Code of Business Conduct Internal Work Regulations Human Rights Training Ethics Channel Ethics Committee Human Management Committee
		Engaging in practices that force individuals to work against their will, under coercion, threat, or abusive conditions.	Right to freedom and to decent and voluntary work (Article 4 of the Universal Declaration of Human Rights).	Children	
	Working hours	Workers are subjected to excessive working hours or are not provided with adequate rest periods.	Right to just and favorable working conditions (Article 23 of the Universal Declaration of Human Rights).	Direct and third-party workers	
	Paid vacation and other social benefits	Workers do not receive paid vacation or the minimum social benefits established by law (such as denying or failing to grant vacation, not recognizing medical leave or licenses, lack of affiliation with health or pension systems, incomplete or non-payment of mandatory social benefits, informal contracts, or subcontracting practices that evade labor rights).	Right to rest, leisure, periodic paid vacations, and social security (Article 24 of the Universal Declaration of Human Rights and ILO Convention C132).	Direct and third-party workers	

General Aspect	Evaluated Aspect	Risk Description	Potentially Affected Human Right	Groups at Risk	Measures
Labor Rights	Freedom of association and collective bargaining	The company limits or prevents workers from exercising their right to organize and engage in collective bargaining (through retaliation, discouragement, or explicit or implicit restrictions, refusal to negotiate or recognize unions, dismissals or threats, promotion of parallel or non-representative unions, or lack of genuine communication channels between the company and workers).	Right to freedom of association and collective bargaining (Articles 20 and 23.4 of the Universal Declaration of Human Rights and ILO Conventions C87 and C98).	Direct and third-party workers	Human Rights Policy Human Rights Management Assessment Business Code of Conduct Internal Work Regulations Human Rights Training Ethics Hotline Ethics Committee Human Management Committee
	Fair and timely payment	Insufficient remuneration: paying wages that do not cover the basic needs of workers and their families. Wage discrimination based on gender, race, age, or disability.	Right to fair and satisfactory remuneration (Article 23 of the UDHR, Article 7 of the ICESCR) and the right to safe and healthy working conditions (Article 23 of the UDHR, Article 7 of the ICESCR, ILO Conventions 155 and 187).	Direct and third-party workers	
		Risk of labor exploitation by withholding or delaying payments, conditioning workers' subsistence. Risk of forced labor or debt bondage: payment delays can leave workers indebted or economically dependent on the company. Risk of social and economic vulnerability: affects the worker's ability to meet basic needs such as food, housing, health, and education. Risk of loss of trust and a negative work environment: generates labor conflicts that may escalate into protests or complaints.		Direct and third-party workers	

General Aspect	Evaluated Aspect	Risk Description	Potentially Affected Human Right	Groups at Risk	Measures
Health and Safety	Risk Identification and Assessment	Risk of workers' exposure to occupational accidents, diseases, or unsafe working conditions due to inadequate risk identification and assessment, improper use of personal protective equipment (PPE), or insufficient training and instruction.	Right to safe and healthy working conditions. Right to life, physical integrity, and health.	Direct and third-party workers	Business Conduct Code Internal Work Regulations Occupational Health and Safety Policy Internal Occupational Health and Safety Regulations SSOMA Culture Manual Occupational Health Plan OHS Training Programs OHS Committee.
	Personal Protective Equipment (PPE)				
	Training and Capacity Building				
Non-Discrimination and Equality	Workplace Discrimination and Harassment	Occurrence of discriminatory acts (based on gender, age, ethnicity, disability, sexual orientation, religion, etc.) and/or labor or sexual harassment toward employees.	Right to equality and non-discrimination (Arts. 2 and 7 UDHR; ILO Convention 111). Right to equal treatment and opportunities in employment (Art. 23 UDHR; ILO Conventions 100 and 111). Right to equality, non-discrimination, and participation under equitable conditions (Arts. 2 and 23 UDHR; Convention on the Rights of Persons with Disabilities, ILO 111).	Direct and third-party workers	Business Conduct Code Diversity, Inclusion, and Equity Policy Corporate Policy for the Prevention and Sanction of Sexual Harassment Internal Work Regulations Human Rights Policy Training Programs Ethics Channel Human Resources Management Committee.
	Equal Opportunities, Diversity, and Inclusion in Employment	Restriction or limitation of access to employment, promotion, or professional development for certain groups in situations of vulnerability or historical discrimination.			
	Inclusive Work Environment	Exclusion, marginalization, or unequal treatment of employees belonging to diverse groups, preventing their full participation and development within the organization.			

General Aspect	Evaluated Aspect	Risk Description	Potentially Affected Human Right	Groups at Risk	Measures
Rights of Local Communities	Dialogue with Communities	Social conflicts arising from lack of information, participation, and recognition of the rights of communities affected by the company's operations.	Right to participation, to be consulted, and to a healthy environment (Art. 25 DUDH; Arts. 7 and 29 PIDESC; ILO Convention 169).	Local communities	Social Management Policy Environmental Policy Complaints and Consultation Procedure Community Communication Channels Social Management Committee Training Sessions.
	Impact Assessment and Mitigation	The company may generate negative human rights impacts on workers, communities, or other stakeholders if effective mechanisms for prevention, mitigation, or remediation are not in place.			
	Grievance Handling and Conflict Resolution	Communities may lack safe and effective channels to report human rights violations or conflicts arising from company operations.			
Cybersecurity and Data Protection	Personal Data Protection	Improper use, loss, leakage, or unlawful processing of personal data of employees, clients, contractors, or communities.	Right to privacy and protection of personal data (Art. 12 DUDH; Art. 17 PIDCP).	Direct and third-party workers, clients, local communities	Information Security Policy Human Rights Policy Guidelines for Internet Use in the Workplace Digital Disconnection Policy Training Sessions.
	Data Breach Management	The company may fail to adequately manage data breaches, exposing employees, clients, suppliers, or communities to misuse of their information.			

General Aspect	Evaluated Aspect	Risk Description	Potentially Affected Human Right	Groups at Risk	Measures
Governance and Transparency	Ethics and Compliance	The organization may engage in practices contrary to ethics and legality (corruption, fraud, bribery, regulatory non-compliance), directly affecting the human rights of workers, communities, and other stakeholders.	Right to fair treatment, equality, and to not be subject to corruption or abuse of power (Arts. 7 and 10 of the UDHR).	Direct and third-party workers, clients, local communities	Anti-Corruption Policy Responsible Business Practices Policy Business Code of Conduct Ethics Channel Ethics Committee Training Sessions Certified System under ISO 37001.
	Transparency and Accountability	The company or institution may fail to provide clear, accessible, and timely information about its management, creating opacity in decision-making and in the management of human rights risks.	Right of access to information and participation (Art. 19 UDHR; Art. 19 ICCPR).		
	Reporting Channels for Irregularities	Workers, communities, or other stakeholders may lack safe, accessible, and effective mechanisms to report irregularities, abuses, or human rights violations.	Right to access to justice, effective remedy, and protection against retaliation (Arts. 8 UDHR; UN Guiding Principles on Business and Human Rights).		
Workplace Sexual Harassment	Prevention of Sexual Harassment	Situations of harassment or sexual assault may occur in the workplace without adequate mechanisms for prevention, response, and sanction.	Rights to dignity, physical and psychological integrity, equality, and non-discrimination (Arts. 1, 2, 3, and 5 UDHR; ILO Conventions 111 and 190).	Direct and third-party workers	Policy for the Prevention and Sanction of Sexual Harassment Reporting Channel Committee against Workplace Sexual Harassment Training Sessions Investigation and Sanction Procedures

General Aspect	Evaluated Aspect	Risk Description	Potentially Affected Human Right	Groups at Risk	Measures
Workplace Sexual Harassment	Training	Workers and leaders may lack the tools or knowledge to identify, prevent, and report cases of workplace sexual harassment.	Rights to equality, dignity, physical and psychological integrity, and a safe working environment (Articles 1, 2, 3, and 5 of the Universal Declaration of Human Rights – UDHR; ILO Conventions 111 and 190).	Direct and third-party workers	Policy for the Prevention and Sanction of Sexual Harassment Reporting Channel Committee against Workplace Sexual Harassment Training Session Investigation and Sanction Procedures.
	Confidential and Secure Channels	Victims of sexual harassment may not report incidents due to fear, mistrust, or lack of confidentiality in existing mechanisms.	Right to a safe and healthy working environment (ILO Convention 190 on Violence and Harassment at Work).		
	Impartial Investigations and Corrective Measures	Sexual harassment cases may not be investigated impartially, or corrective measures may not be effectively applied, leading to impunity and lack of victim protection.	Rights to dignity, integrity, equality, and access to justice (Articles 1, 2, 3, 5, and 8 of the UDHR; ILO Conventions 111 and 190).		
	Support and Resources for Victims	Victims of sexual harassment may not receive adequate support or the necessary resources for their protection, recovery, and reparation.	Rights to dignity, physical and psychological integrity, equality, and access to justice (Articles 1, 2, 3, 5, and 8 of the UDHR; ILO Conventions 111 and 190).		



Mitigation and Remediation

Mitigation Actions

At AENZA, we implement human rights mitigation measures across all our business units to reduce the likelihood of negative human rights impacts caused or contributed to by our activities.

❖ **Codes, Policies, and Guidelines**

- We have a Business Conduct Code and a corporate policy that reflect our principles regarding human rights. In addition, we have several documents that establish clear guidelines to mitigate the risk of human rights violations, aligned with the issues prioritized in our Human Rights Risk Matrix.

Main KPIs 2024

- ✓ **100%** of these documents are available on internal platforms and/or our corporate website.
- ✓ **100%** of employees received the Business Conduct Code.
- ✓ Our main corporate policies and documents are shared with suppliers across all business units.

[Corporate Policies| AENZA](#)

Training and Awareness

- AENZA implements a comprehensive training program across all its business units, aligned with applicable internal and external regulations. These programs prioritize topics related to labor conditions, occupational health and safety, and workplace sexual harassment, among others. The trainings provide strong support for raising awareness about the values, actions, and decisions faced within the different companies of the Group, particularly those related to human rights.
- We also promote human rights awareness throughout our supply chain and among our suppliers.

Main KPIs 2024

- 100% of our employees received training on occupational health and safety.
- 100% of employees were trained on anti-corruption practices.
- 100% of Board members participated in 23 sessions on ethics and compliance.
- More than 100 executives took part in diversity training sessions under the corporate executive development program, while the “Leaders in Action” program reinforced these topics for mid-level management.
- Regular training is provided on sexual harassment prevention. More than 230 employees strengthened their knowledge on workplace harassment and abuse prevention.
- Over 60% of our employees have received cybersecurity training.
- The supplier pre-qualification and standardization process for logistics and procurement procedures is currently being implemented across all subsidiaries. In this context, training sessions for suppliers are being carried out on various relevant topics.

Mitigation Actions

❖ Due diligence

- We conduct human rights risk assessments across the company and throughout our supply chain.
- We identify and address potential and actual negative human rights impacts, and we have established a monitoring and evaluation process to ensure the effectiveness of our mitigation measures.

Main KPIs 2024

- 100% of projects underwent internal audits.
- 100% of suppliers identified with actual or potential substantial negative impacts were supported in implementing corrective action plans.
- 24 social programs were implemented in the areas of influence of our business units.
- All business units are covered by our Occupational Health and Safety Management System, achieving the following results:
 - 0.15 severity rate
 - 0 employee fatalities
 - 0 disabling contractor accidents (major consequences, excluding fatalities)
 - 0 disabling employee accidents (major consequences, excluding fatalities)
 - 0 lost-time contractor accidents
- 80% of our technology infrastructure was migrated to the cloud, with no capital blockages or data breaches, and we achieved a cyber maturity score of 3 out of 5.

❖ Participation and Consultation

- We have an external and independent Ethics Channel that allows reports and concerns to be submitted securely and confidentially. This channel is available to directors, employees, partners, clients, suppliers, and third parties with whom we maintain relationships, including the communities where we operate. Its implementation reinforces our commitment to transparency, due diligence, good corporate governance, and respect for human rights.
- The channel is managed by a third-party provider, which receives, records, and classifies all reports confidentially before forwarding them to the responsible Committee for evaluation. Concerns can also be reported anonymously. Multiple reporting mechanisms are available, including: web form, email inbox, voicemail, postal address, telephone line, and in-person meetings.
- In addition, all our business units have communication channels designed to encourage participation and consultation from individuals or groups who may feel affected by the Group's activities. We collect and listen to stakeholder opinions and concerns, and establish response mechanisms to ensure that such concerns are effectively addressed.

Main KPIs 2024

- ✓ 92% of all reports submitted through the Ethics Channel were resolved.
- ✓ 100% of action plans related to workplace harassment cases were activated.
- ✓ 94% of community complaints were addressed.

[Ethics
Channel](#)

AENZA implements remediation actions across all its business units when it identifies that it has caused or contributed to a negative impact on human rights, ensuring that affected individuals receive effective redress. These actions aim to restore individuals or groups harmed by the company's activities to the situation they would have been in had the impact not occurred.

When full restoration is not possible, remediation may involve compensation or other forms of reparation intended to address the harm caused. Outcomes may take various forms, such as apologies, restitution, rehabilitation, financial or non-financial compensation, and punitive sanctions (whether criminal or administrative, such as fines), as well as preventive measures, including precautionary actions or guarantees of non-repetition.

These measures are applied through the handling of reports submitted via the Ethics Channel, as well as complaints and inquiries from local communities. They are also implemented in response to occupational health and safety incidents or situations that could involve violations of labor or environmental compliance obligations. In managing all such cases, the company's corporate policies require actions to be carried out fairly and proportionately.

Remediation Actions

Main KPIs 2024

✓ Actions taken in response to reports received through the Ethics Channel.

In 2024, a total of 35 reports were received, covering issues such as abuse of authority, workplace mistreatment, work climate, workplace sexual harassment, information security/confidentiality/improper appropriation, and occupational health and safety.

Of these, 16 cases were found to be substantiated. For those 16 confirmed cases, the following remediation actions were implemented:

✓ Timely and effective response to sexual harassment reports was ensured, including impartial investigations and corrective measures. Support and resources were also provided to victims of workplace sexual harassment, including counseling and legal assistance.

Remediation actions	N°
Disciplinary action against employee	6
Support for employee skill development	4
Employee termination	4
Policy updates and establishment of new controls	2
Awareness and communication with the relevant area	1
Work climate improvement	1
Development of action plan and policies	1
Reinforcement of anti-corruption messages	1
Reinforcement of anti–sexual harassment messages	1
Total	21



Monitoring and Communication

AENZA reports annually on its human rights management through the Integrated Report, a public document accessible to all employees and strategic partners of the Group. This report includes, among other topics, the number of complaints received through the Ethics Channel, as well as the status of each of them.

As part of this management, the corporate committee responsible conducts periodic monitoring of the actions implemented to prevent and remedy possible situations of human rights violations, whether within the Group or in its relationship with strategic partners.

In addition, we have key corporate documents available to all our stakeholders. These include: the Human Rights Policy, the Human Rights Management Assessment, and this corporate brochure, where we provide detailed information about our management in this area.

[Consolidated Report 2024](#)



Thank you.