

We connect with what
really matters

Mexico



2021
ANNUAL
SUSTAINABILITY
REPORT



ALEATICA

Smart & Sustainable Infrastructure

We live in an increasingly dynamic world that demands intelligent and sustainable transportation solutions; **at ALEATICA we connect with what really matters** to ensure a mobility that is efficient and responsible towards our planet. We are convinced that this connection is a combination of **actions that positively impact the present and future** of millions of people, industries, towns and cities.

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About the report

GRI: 102-12, 102-32, 102-50, 102-52, 102-53, 102-54, 102-56

This 2021 Integrated Annual Report presents the results of implementing sustainability practices, policies, programs, and strategies, as well as the financial results for the fiscal year 2021, including economic, social, and environmental performance and value creation of all ALEATICA's Business Units in Mexico¹.

Contents definition was based on the Materiality Analysis, which was conducted globally and in some Business Units in 2019, updated in 2020 and still in effect in 2021, to identify the relevant aspects of our sector, our main risks, and impacts, as well as sustainability aspects relevant to our investors and our main stakeholders. This analysis will allow us to communicate our results as a company in terms of our business objectives and measure the positive impacts we generate on society and the planet.

We prepared this report based on GRI (Global Reporting Initiative) and SASB (International Sustainability Standards Board - IFRS Foundation) standards, as well as in compliance with the requirements of the Mexican Stock Exchange and specific requirements of our control investor, which adheres to the Principles for Responsible Investment and establishes some indicators aligned to environmental, social and governance aspects.

Forward-looking statements or statements with future projections

This document contains forward-looking information and statements about Grupo ALEATICA² in Mexico, with underlying assumptions, statements related to plans, objectives, and expectations regarding future operations. Forward-looking statements are not historical facts and are generally identified by the use of terms such as "expects," "anticipates," "believes," "intends," "estimates" and similar expressions.

In this regard, while Grupo ALEATICA believes that the expectations contained in such forward-looking statements are reasonable, it is cautioned that forward-looking information and statements are subject to risks and uncertainties, many of which are difficult to predict and are generally beyond the control of Grupo ALEATICA, risks that could cause actual results and developments to differ materially from those expressed in, or implied or projected by the forward-looking information and statements.

Forward-looking statements speak only as of the date they are made and are not guarantees of future performance. It is recommended that decisions not be made based on forward-looking statements. All forward-looking statements contained in this document are expressly qualified by the cautionary statements made herein. The forward-looking statements contained in this document are based on information available to us as of the date hereof. Except to the extent required by applicable law, Grupo ALEATICA undertakes no obligation to publicly update any forward-looking statements or revise any forward-looking information, even if new information is made public or new events occur.

About ALEATICA and this Integrated Annual Report:

Website:

<https://www.ALEATICA.com/>

Office of the Chief Executive Officer:

Mr. Rubén López Barrera

Business sector:

Transportation infrastructure operators.

Activity:

Pure transportation infrastructure operator of roads and airports

Countries of operation:

Mexico, Spain, Peru, Chile, Colombia and Italy; however, this report deals only with the Business Units in Mexico.

Dissemination of the Annual

Non-Financial Information Report:

ALEATICA Website and email, and Global Compact platform.

Report preparation cycle:

Annual

Point of contact:

- Financial information: CFO - Gabriel Núñez - gabriel.nunez@ALEATICA.com
- Non-financial information: Global Director of Sustainability and Customer Service - Vanessa Silveyra - vanessa.silveyra@ALEATICA.com

Message from the CEO in Mexico

GRI: 102-14

I proudly share the **Annual Non-Financial Report** with the main results of the initiatives implemented in year 2021.

Aleatica S.A.B. de C.V. is a leading company in the operation of sustainable and safe transportation, thanks to the fact that we have faced challenges in the best feasible way, always aligned with the 5 pillars that rule all our actions.

We perform under a comprehensive vision to generate long-term value and have prioritized safety and physical integrity of our customers and associates. Thanks to the implementation of the safety strategy included in *Safety First Plan*, since 2018, the occupation accident rate decreased in 61%. While this is an important figure, we want to consolidate a *Safety* culture, therefore, our goal is to reach to zero accidents to have our associates get home safe and sound daily.

This reflects likewise our commitment to the passion for the team value, given that, without our associates, nothing of what we do would be possible. In this regard, we created a COVID-19 support plan whereby we established protocols and campaigns in all our business units, focused in keeping operating under the strictest safety standards. Likewise, we implemented all learning from these years and launched and hybrid working model which has

allowed us to be linked more efficiently among all the teams. As part of this project, we inaugurated our new corporate headquarters, and open and collaborative space that reflects these values.

In addition, customers are the main focus of our operation; therefore, we focus on providing services of excellence to offer them a first-class experience. We have redefined our internal culture toward a Customer Experience focused on providing them safe, comfortable, and agile journeys. Through Transversal Customer Experience Committees, we focus on the follow-up of projects aimed at their needs and requirements, and at the same time, on the improvement of internal processes to solve high-impact complaints. As part of this, we have started consolidating communication lines through a unified Contact Center. We are confident that this approach will allow us to improve our service quality on an ongoing basis.

In 2021, we also consolidated our social and environmental sustainability aligned with the best international practices. The Environmental, Social and Corporate Governance Committee (ESG) was created with the purpose of establishing an operating process to facilitate the achievement of objectives and goals in this matter, recognizing the need for performance consistent with our objectives and responsible actions for the three criteria.

We perform under a comprehensive vision to generate long-term value and **have prioritized safety and physical integrity of our customers and associates**

Aligned with the purpose of promoting a sustainable mobility, thanks to the initiatives to reduce polluting emissions into the atmosphere, in 2021 we kept with our ECOTAG program with excellent results. Likewise, given the importance of global water stress, we had a significant reduction in water consumption in all business units, with reuse actions arising from treatment of wastewater and water collection systems. For the social part, we managed to carry out a materiality analysis to identify topics that are relevant to our stakeholders and thereby promoted the **Community Relationship Plan** to foster the well-being of person in vulnerable conditions.

In accordance with the Corporate Integrity pillar, we have promoted the **Compliance** program and the **Independent Ethical Channel "I Care"** to have associates and third parties report potential breaches to internal policies or to the Code of Ethics. Likewise, we are glad to have to new independent female directors to keep promoting gender equity and enrich our corporate culture from this Governance Body.

This report highlights the huge progress we have made with project that have positively impacted on customer, communities and environment, all that aligned with the commitments we have with our investor *IFM Investors*.

We will keep working to keep ALEATICA in the vanguard as a reference point in the operation of smart, safe and sustainable transportation infrastructure through the actions we carry out.

Yours very truly,
Rubén López Barrera
CEO of Aleatica México



ESG SAB Committee

Considering that Sustainability is key to strengthening the link with our stakeholders and to permanently implement practices, policies and programs, in 2021, ALEATICA SAB, subsidiary of ALEATICA SAU and parent company of the group, created the ESG (Environmental, Social and Governance) Committee, which seeks ALEATICA's long-term commitment to add value for our investors, recognizing the need for performance to be consistent with our objectives and responsible actions in Environmental, Social and Governance matters.

This Committee is composed of a Chairman and three independent directors, who will meet twice a year starting in the second quarter of 2022, for which a Reporting Plan is developed to report on the progress and strategies on ESG issues.

The main objective of this ESG Committee is to establish an operating process to facilitate the achievement of the company's ESG objectives and goals, as well as its pillars.

The ALEATICA SAB ESG Committee is responsible for:

- Establishing, agreeing and reviewing the company's ESG strategies, ensuring that they remain an integral part of the overall strategy, and also making sure that that social, environmental and economic activities are aligned.
- Promoting dialogue with the company's various stakeholders to understand their expectations and learn about their knowledge of ESG issues.
- Ensuring that the company recognizes the impact of its activities, and how they affect its investors, customers, employees, suppliers and the community in general, and that such activities are carried out in a responsible manner, within its operations and its business growth and development plans.
- Reviewing social and environmental impacts, as well as potential ESG-related climate change and human rights risks to the business and making decisions that will shape the operation and communities.

The main objective of this ESG Committee is to establish an operating process to facilitate the achievement of the company's ESG objectives and goals, as well as its pillars



- Keeping the Board up to date and fully informed of strategic issues and business changes that may affect the company and the market in which it operates.
- Developing and supporting the necessary activities to translate ESG policies into an effective plan for implementation and agreeing on a program of specific ESG activities supported by appropriate targets and key performance indicators.

In addition to this Committees, the Global Sustainability and Customer Service Division is strategically structured, with management and a Global Environmental and Social Sustainability Coordinator, supported by a Sustainability or Environmental representative in each Business Unit, who periodically report on the performance of the sustainability strategy to the Management of each country, region and globally.

The commitment of each and every one of ALEATICA's Functional Divisions, as well as the Steering Committee and the Business Unit Divisions, is of vital importance for the execution of the

strategies and the operational continuity of the projects. Hence, we believe it is essential to mention all the Divisions that participate in leadership and action to implement Sustainability transversely and permanently, as it is what drives us towards a more sustainable future.





Vanessa Silveyra

Global Director of Sustainability
and Customer Service

Social and Environmental Sustainability is one of our five pillars, a fundamental one and a transversal axis in everything we do and how we operate. The ESG (Environment, Social and Governance) criteria are now shared by all our Functional Areas and Business Units.

Based on this mutual understanding, we have been able to advance towards a Climate Change Strategy, in terms of emissions reduction and energy efficiency, as well as in the assessment of the vulnerability of our concessions to the effects of climate change and the consequent risk prevention and mitigation plans.

Likewise, our Business Units have drawn up their own sustainability strategies, based on an internal and external social and environmental diagnosis, such as the Materiality Analysis or the identification of interested parties, as part of ISO 14001.

We have an **Annual Sustainability Training Program**, which allows us to accompany the Business Units in the implementation of the Global Sustainability Strategy through the knowledge and experience of experts in different environmental and social issues.

We work together with the areas of Human Resources, Safety, Risk and Compliance, especially to address the issues of Diversity and Inclusion, Health and Wellness, Ethics, Transparency and Social and Environmental Compliance, as well as the correct identification of Environmental and Social Risks.

At ALEATICA there is a clear notion that Social and Environmental Sustainability and ESG issues are what allows us to generate investment and impact on the surroundings, on the environment and on people, employees, customers, communities, public and private institutions and civil society, and thus contribute to the development of the communities and countries in which we operate. For ALEATICA, if it is sustainable, it is development.

ALEATICA

Snapshot

Business units and geographic location³

GRI: 102-2, 102-4, 102-6, 102-7, 102-45

	Year of concession granting	Startup of operations	Term expiration
CIRCUITO EXTERIOR MEXIQUENSE	2003	Nov 2005	2063
GRUPO AUTOPISTAS NACIONALES (GANA)			
AMAZOC-PÉROTE	N/A	Jan 2007	2063
LIBRAMIENTO DE PEROTE	N/A	July 2004	2043
VIADUCTO BICENTENARIO (VB)	2008	Sep 2009	2038
AUTOPISTA URBANA NORTE (AUNORTE)	2010	Dec 2012	2042
ATIZAPÁN-ATLACOMULCO (AT-AT)	2014	N/A	2044
SUPERVÍA PONIENTE	2010	Jun 2013	2043
LIBRAMIENTO ELEVADO DE PUEBLA (LEP)	2014	Oct 2016	2046
ADMINISTRADORA MEXIQUENSE DEL AEROPUERTO INTERNACIONAL DE TOLUCA (AMAIT)	2005	Jun 2006	2055

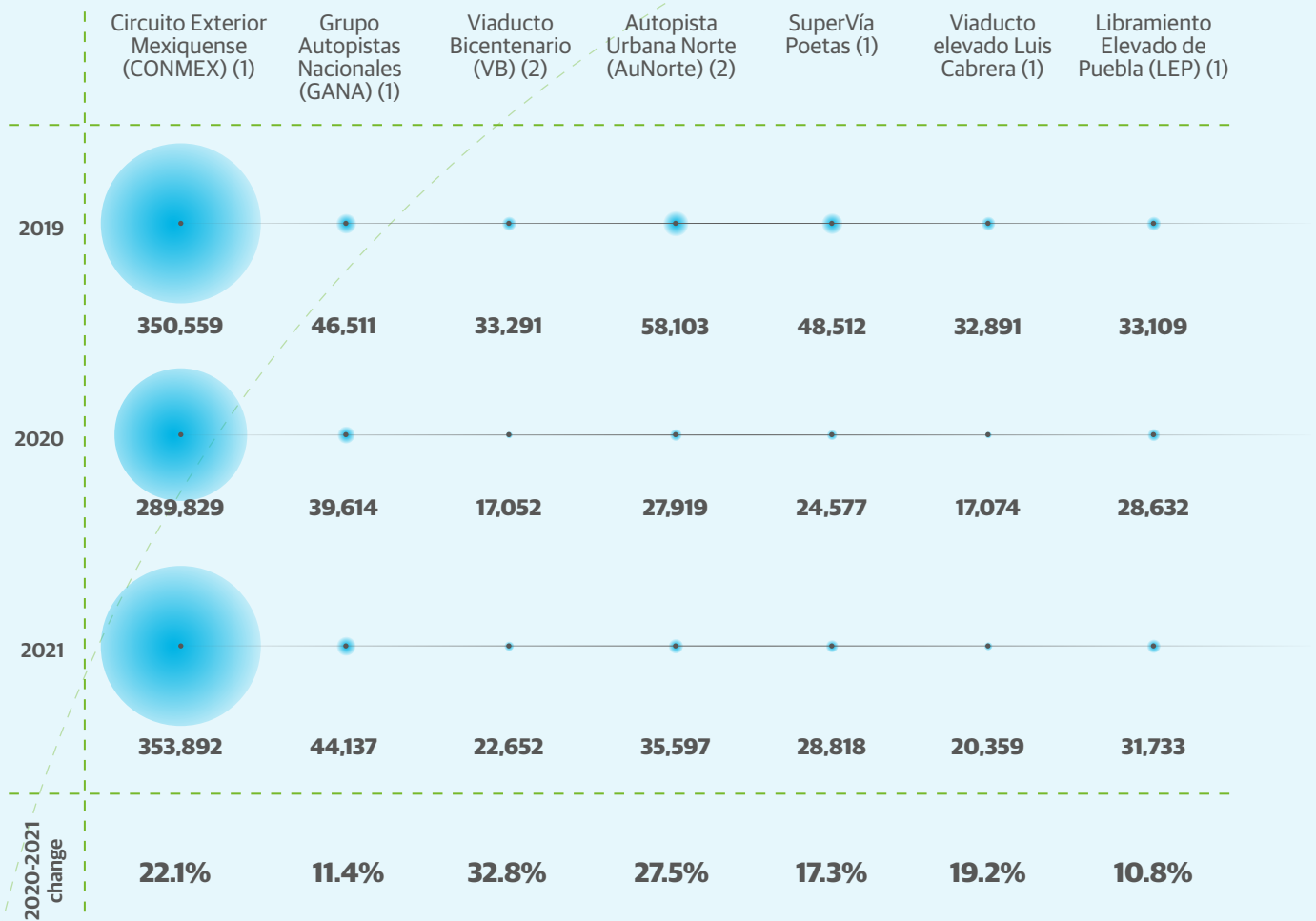
Main activities of the organization

ALEATICA has positioned itself mainly as a transportation infrastructure operator. Therefore, the company is made up of different business units with the purpose of complying with the concession titles they hold, as well as of different companies associated for this same purpose. These business units are focused on the construction, development, maintenance, operation and exploitation of the current Concessions.

Distance in km or N° of Pax	% of Aleatica interest	TIR ⁴	Stage
155	51.0%	10%	Operation
104.9	69.2%	N/A	Operation
17.6	69.2%	N/A	Operation
32	100%	7%	Operation
9.8	100%	10%	Operation
77.2	100%	N/A	Construction
6.89	50%	10%	Operation
15.3	51%	10%	Operation
8 million Pax	49%	N/A	Operation

Relevant operating figures

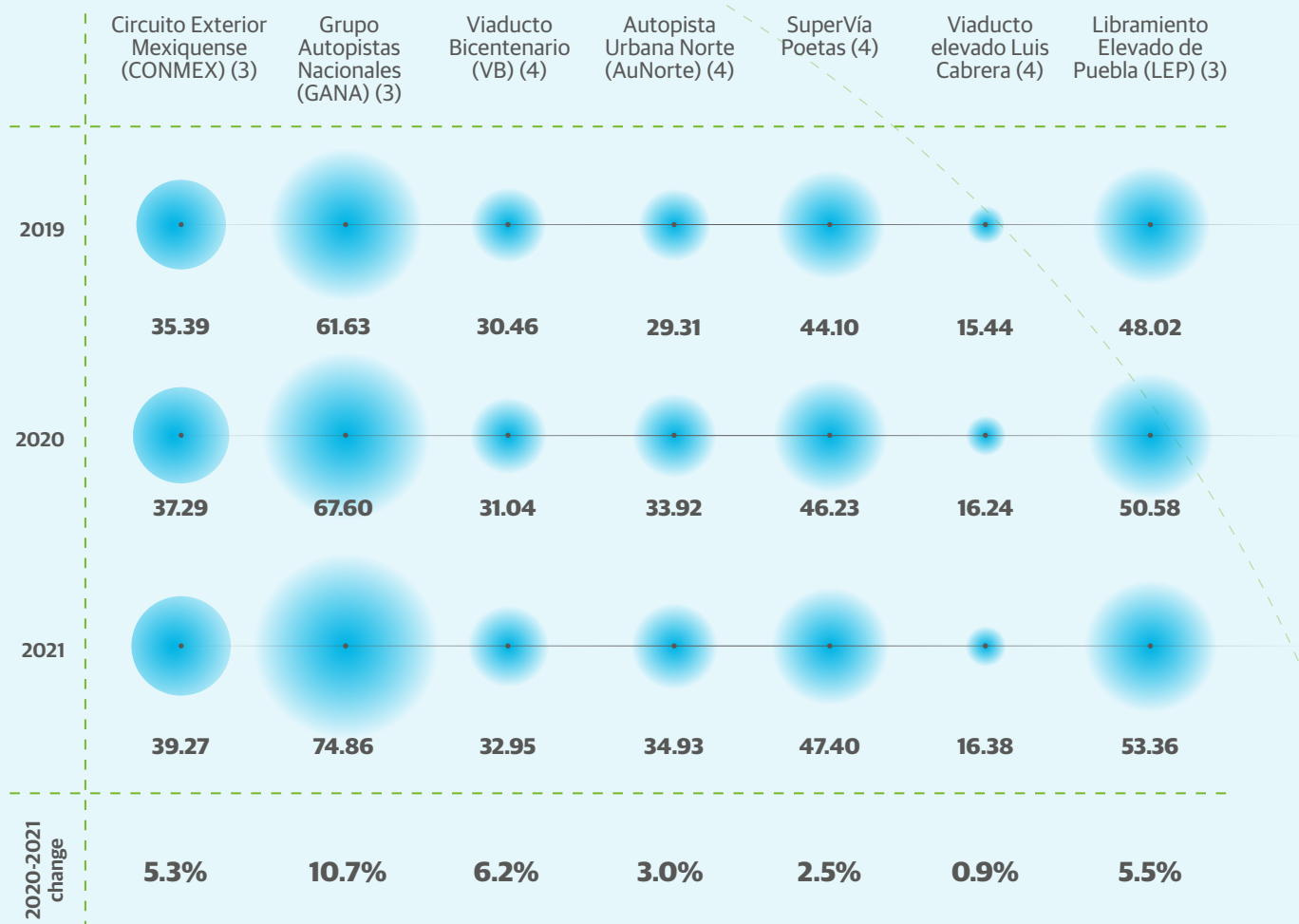
DAILY AVERAGE TRAFFIC



(1) Average Equivalent Daily Traffic. Daily traffic, converting different categories of vehicles in "light vehicles" using rate levels for each category.

(2) Average Daily Intensity (ADI) It represents the number of road customers who hypothetically would have travelled the total distance of the highway.

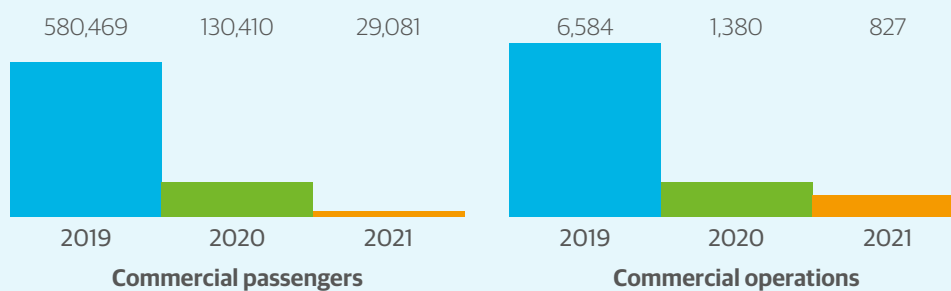
AVERAGE FEE PER VEHICLE



(3) Equivalent Average Fee per Vehicle. Total income divided by total vehicles.

(4) Average Fee per Vehicle. Annual income / days of the year / average fee per vehicle or equivalent average fee per vehicle.

Operations of Administradora Mexiquense del Aeropuerto Internacional de Toluca (AMAIT)



Data

GRI: 102-7, 201-1

CONCESSIONS

ROAD ASSETS

7

AIRPORT

1

We have 7 assets in operation and 1 in construction.

TOTAL INCOME

IN 2021

10,928 MP

IN 2020

6,750 MP**EBITDA**

IN 2021

5,026 MP

IN 2020

4,045 MP**INCOME FROM TOLLS**

IN 2021

7,768 MP

IN 2020

6,004 MP**AFTER-TAX PROFIT
(LOSS)**

IN 2021

(2,029) MP

IN 2020

(0.888) MP

ASSET INVESTMENT

IN 2021

2,613 MP

IN 2020

0.635 MP

INTANGIBLE ASSETS RELATED TO INVESTMENT IN CONCESSIONS (ACCRUED)

IN 2021

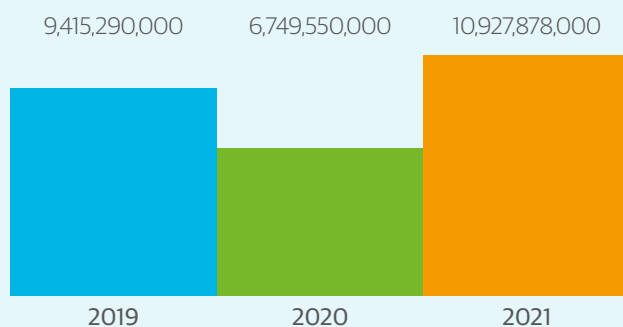
105,386 MP

IN 2020

102,773 MP

INCOME HISTORICAL INFORMATION

Income in Mexican pesos



Income in US dollars⁵

IN 2019

488,807,093

IN 2020

313,989,658

IN 2021

538,802,330

Our Business

GRI: 102-2, 102-4, 102-6, 102-7, 102-15, 207-4, 413-1

Corporate philosophy

GRI: 102-16

At ALEATICA we provide smart, safe and sustainable mobility solutions that a world on the move requires, backed by cutting-edge technology that anticipates customer needs.

We work every day to improve the quality of life of our customers and employees as well as the conditions in our environment. We develop technological projects for sustainable mobility and generate alliances with organizations committed to caring for the environment.

Through our actions, we create safe paths. In this way, the pillars of the company are strengthened in all our actions and projects.



SAFETY FIRST

Safety is and always will be our top priority. We take care of every customer, every person and every employee. It is an attitude present in ALEATICA's culture.



SOCIAL AND ENVIRONMENTAL SUSTAINABILITY

For ALEATICA, if what we generate is not sustainable, it is not development. We respect and strive to improve the environmental and social environment in which we operate. We promote human rights and encourage social inclusion.



TRANSPARENCY AND CORPORATE GOVERNANCE

We apply the highest standards of corporate governance. We adopt the best international practices to guarantee transparency. We seek efficiency and integrity in the service we provide, guaranteeing our customers the best quality of service.



SERVICE EXCELLENCE

Our *raison d'être* is people, we owe it to them. We take care of our customers. We apply a systemic and innovative approach to provide a high added value service. We are allies of our customers.



PASSION FOR THE TEAM

Our people, with their commitment, passion and vision, make it possible to achieve the results and the mission we set out as a company. We recognize their efforts, commitment and collaboration. We enjoy both work and personal life.

Sustainability management

GRI: 102-12, 102-15, 102-16, 102-29, 102-43; Law 11/2018:

We work every day to improve the quality of life and conditions in our environment, we develop technological projects for sustainable mobility and generate alliances with entities committed to environmental care

For ALEATICA, if what we generate is sustainable, that is development.

In order to align ourselves with the ESG Committee and meet our investors' ESG requirements, we adhere to international sustainability principles and guidelines. For this reason, since 2018 we have joined the **Global Compact Mexico and Spain**, a voluntary initiative of the United Nations that invites signatory organizations to commit to implementing universal sustainability principles and taking actions to accelerate the path towards the Sustainable Development Goals (SDGs) of the 2030 Agenda.

We work every day to ensure that ALEATICA's Business Strategy and Operations are aligned with the **Ten Universal Principles on Human Rights, Labor Standards, Environment and Anti-Corruption**, in order to take measures that increasingly promote the Sustainable Development Goals (SDGs). At ALEATICA we contribute directly to some of the 169 targets of the 17 SDGs and indirectly to additional targets of the 2030 Agenda.



At the end of 2021, we joined the Global Compact initiative **SDG Ambition** (Sustainable Development Goals), which is an accelerator program that will help us define ambitious corporate goals aligned to the **17 Sustainable Development Goals** (SDGs) and accelerate their integration into the core of ALEATICA's business strategy and performance management, which will be established and measured starting in 2022.

The Global Sustainability Management bases its strategy on **ALEATICA's Sustainability Policy and Standard**, guidelines that seek to be an agent of well-being that contributes socially and environmentally. To this end, it develops social and environmental programs and projects that respond to the needs identified to generate a positive and measurable impact on society and the environment and, in turn, contribute to the sustainability of the business.

Our principles



Adding value to all ALEATICA's stakeholders, such as customers, communities, investors, employees and third parties, through internal and external social and environmental investment.



Integrating ALEATICA's social and environmental sustainability culture, based on the implementation of national and international standards.



Complying with social and environmental regulations and other legal requirements applicable to the organization.



Respecting, protecting and promoting human rights of the company's stakeholders.

Compromisos de Sostenibilidad

GRI: 102-20

- Implementing a **Strategic Sustainability Plan** that allows us to diagnose and prioritize internal and external social and environmental needs.
- Collaborating with all areas of the organization to develop programs and projects to address the most relevant issues, as well as to evaluate the impacts.
- Assessing the physical and transitional risks associated with climate change and contribute to the reduction of carbon emissions, waste and polluting materials, as well as energy efficiency, through projects, actions and initiatives.
- Supporting the implementation of the **Safety First Plan** by providing road safety education training to communities, neighbors and customers.
- Conducting sustainability workshops aimed at integrating the culture of sustainability for stakeholders, on internal and external sustainability issues.
- Complying with the **Sustainable Development Goals (SDGs)** of the 2030 Agenda, since ALEATICA is a member of the United Nations Global Compact.
- Periodically reporting to stakeholders on the actions implemented and the results in terms of social and environmental sustainability, as well as the impact generated.
- Allocating economic, human and technical resources that have a positive impact in environmental and social terms.
- Communicating both internally and externally the implemented programs and projects, as well as the impact generated in terms of sustainability.

Given our commitment to the environment, this year we integrated into our Sustainability Policy environmental commitments applicable to all our employees and stakeholders, in order to create a culture and awareness of the importance of caring for the environment.

Environmental Commitments

- Ensuring environmental protection, working in a preventive manner to minimize the environmental impacts produced as a result of the activities carried out in our Business Units, respecting the ecosystems and biodiversity in the environments in which we operate.
- Assessing the physical and transitional risks associated with climate change and contribute to the reduction of emissions and carbon footprint, contributing to energy efficiency through projects, actions and initiatives.
- Performing an annual periodic evaluation of legal requirements and environmental aspects, to maintain, control and improve our processes.
- Preventing environmental pollution through source reduction and recovery of waste generated, with a circular economy approach.
- Preventing soil and groundwater pollution by controlling discharges into the environment and preventing environmental incidents.
- Promoting the efficient use of water and energy resources, prioritizing savings and reduction.
- Maintaining an environmental culture in all our employees by complying with the **Annual Sustainability Training Program**, through awareness and sensitization, as well as training and development in environmental matters.
- Integrating and maintaining the Environmental Management System with ISO 14001 guidelines in order to ensure continuous improvement and effectiveness of processes.





As a result of the above, the Global Directorate of Sustainability and Customer Service implements the Strategic Sustainability Plan based on a methodology composed of three phases:

1

Diagnosis. Through a Materiality Analysis, which aims to identify the most relevant issues for internal and external stakeholders, as well as the social and environmental needs of each Business Unit and the corporation.

2

Project Management and Social Action. Identified relevant issues will be prioritized and addressed through social and environmental projects and/or actions, which in turn allow us to prevent risks, comply with applicable laws, and meet the needs of the communities and the expectations of our investors and stakeholders.

3

Impact Assessment. To ensure that the resources allocated to social and environmental projects and actions, both internal and external, represent an investment that positively changes the reality of the beneficiaries, the impact generated will be followed up, monitored and evaluated in order to measure their effectiveness or, if necessary, to propose improvements in the execution of the projects.

Materiality Analysis

GRI: 102-40, 102-42, 102-43, 102-44, 102-46, 102-47, 103-1, 103-2

The **Materiality Analysis** of relevant sustainability issues is a strategic value creation process that allows the identification of economic, social and environmental issues for ALEATICA and its stakeholders.

In 2020, **ALEATICA's Materiality Analysis** was updated globally, and is still in force, with the following methodology:

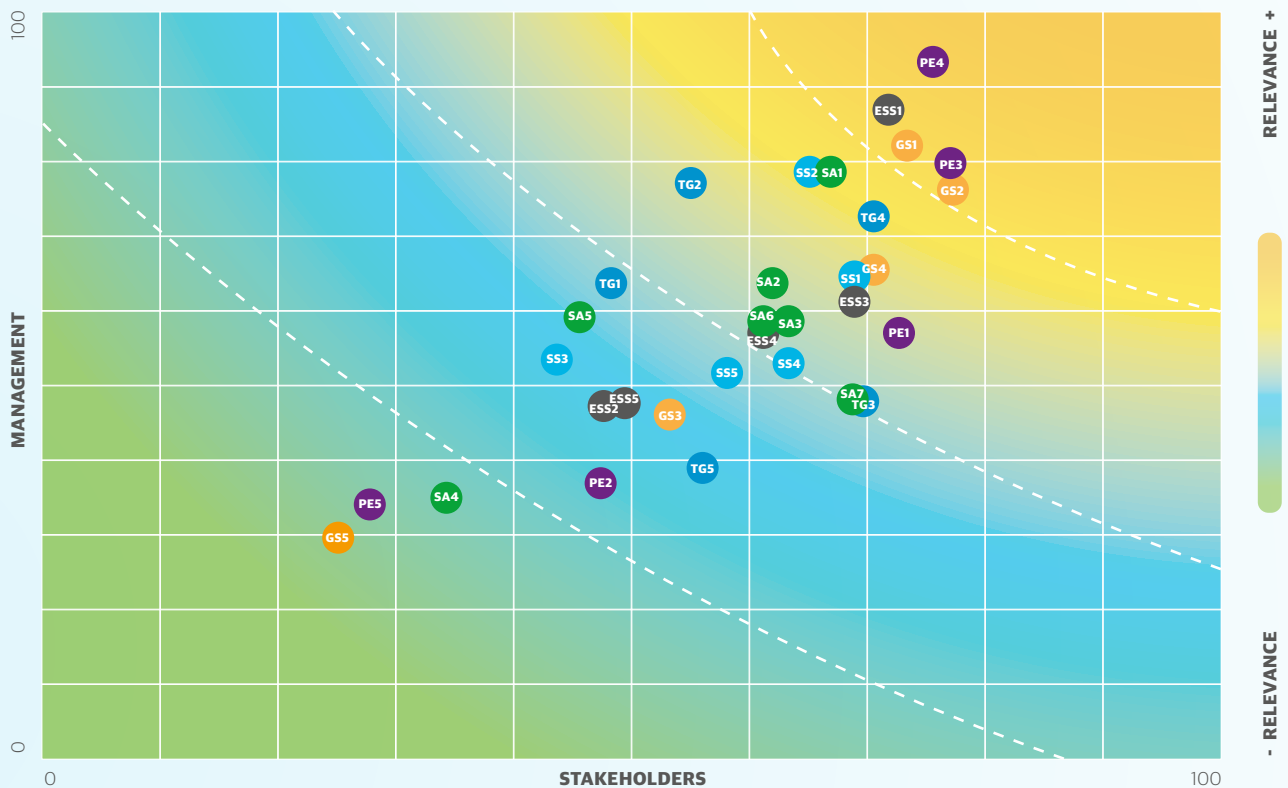
- Reviewing ALEATICA's business objectives to identify the goals that have been set.
- Reviewing public information from relevant competitors in the infrastructure, ports, airports and road concessionaires' sector to understand what sustainability issues they are focusing their efforts on and to understand the sectors' priorities.
- Identifying global risks by Risk Management and aligning material issues.
- Identifying relevant stakeholders to gather opinions and perceptions on relevant issues to be prioritized by ALEATICA at a global level.
- Having the company's main management of all Business Units assess and prioritize key issues.
- Gathering information through surveys to key stakeholders.
- Analyzing standards and indicators requested by investors on environmental, social and governance agenda.
- Validating results and prioritizing sustainability issues globally.

The following stakeholder groups were identified:

- Investors
- Senior Management (CEO and Regional Directors)
- Functional Management
- Business Unit Managers
- Area Managers
- Employees
- Financial Institutions
- Strategic Suppliers
- Strategic Alliances
- Communities where we operate

Once the stakeholders were identified, the sample was defined and a survey was designed with a list of material topics that included relevant issues of the three sustainability axes (environmental, social and economic), taking into account relevant issues pertaining to the sector and the context.

The results obtained from the application of the survey, as an opinion, and from the analysis of external factors (media, trends and global risks) were weighted to build the following materiality matrix.



Transparency and corporate governance

- TG1** Structure and governance
- TG2** Risk management
- TG3** Regulatory compliance and assessment
- TG4** Business ethics and anti-corruption
- TG5** Transparency and fiscal management

Social sustainability

- SS1** Human Rights
- SS2** Citizenship safety and road safety
- SS3** Social investment in communities
- SS4** Social and cultural participation
- SS5** Economic and local development

Environmental sustainability

- SA1** Adapting to climate change
- SA2** Management and consumption of energy
- SA3** Management and consumption of water
- SA4** Management and consumption of materials
- SA5** Waste management
- SA6** GHG emissions management
- SA7** Protection of Biodiversity

Passion for the team and safety first (employees)

- PE1** Work conditions and work environment
- PE2** Talent management
- PE3** Work health
- PE4** Work safety
- PE5** Diversity, inclusion and gender equity

Sustainability management

- GS1** Strategy and Sustainability Committee
- GS2** Management of Interest Groups
- GS3** Control and Monitoring of Indicators Due
- GS4** Diligence Processes Sustainability
- GS5** Reporting

Excellence in service and safety comes first (users)

- ESS1** Operating Model and Business Continuity
- ESS2** User Experience
- ESS3** Emergency management
- ESS4** Maintenance of road infrastructure
- ESS5** IT Security and Cybersecurity

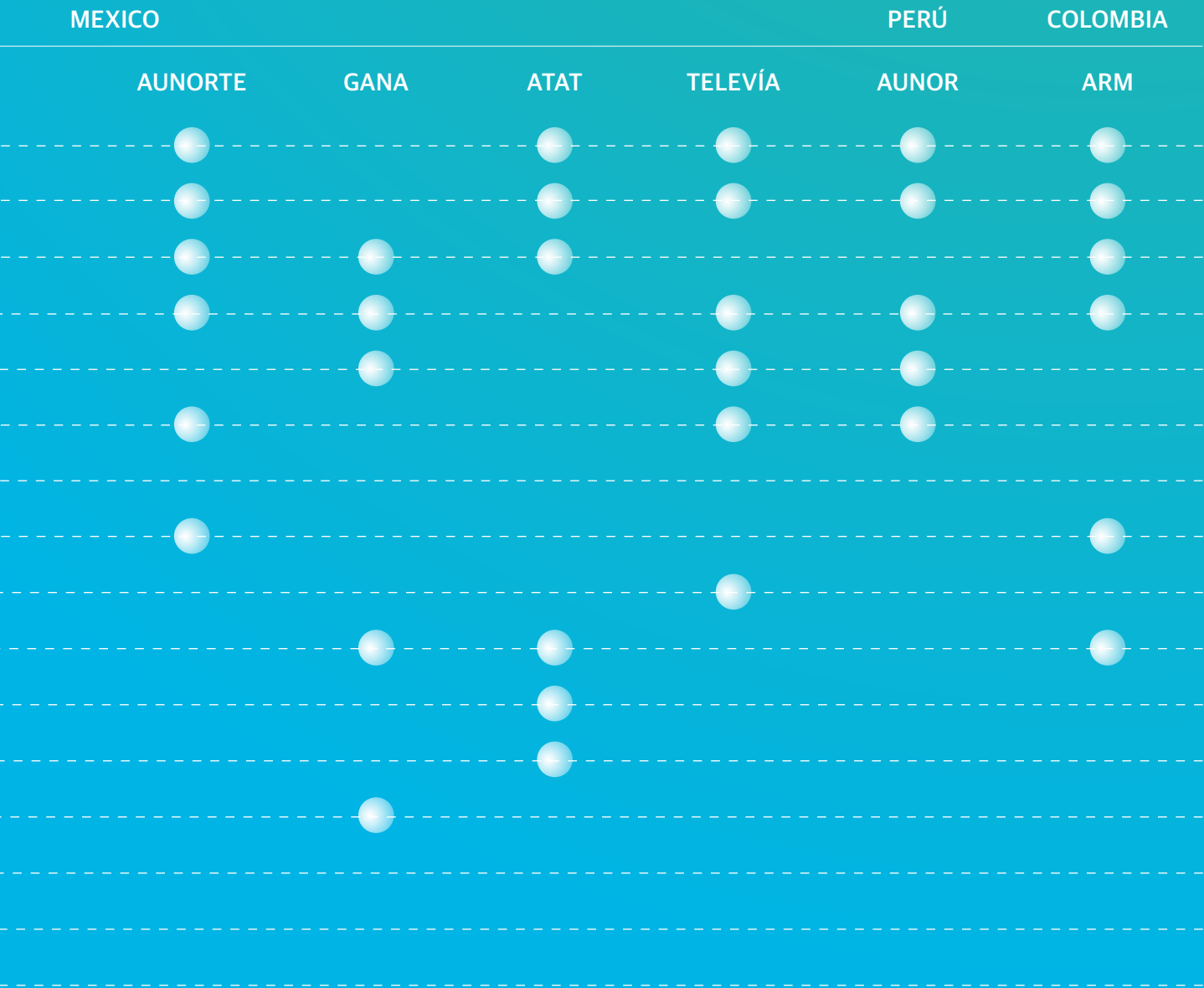
For creating this matrix, the Y axis considered Senior Management (CEO and Regional Directors), Functional Directors, Business Unit Managers and Investors. On the X axis, the following stakeholders were considered: Employees, Financial Institutions, Strategic Suppliers, Strategic Alliances, Government, Communities and Materiality in Business Units.

Although this was defined globally, one of the best practices we have implemented in ALEATICA is that each of the Business Units develops a Materiality Analysis to define the most relevant topics, not only from the dialogue with stakeholders, but also from the analysis of the impacts, risks, trends and relevant topics of the sector.

In the following chart,⁶ we can visualize the most relevant topics for the **Business Units of Mexico** and the ones they are working on to improve their sustainable performance. It is worth mentioning that CONMEX updated its Materiality Analysis in 2022, which means it will begin its implementation plan in 2022.



● The most relevant topics identified in the Materiality Analysis of Business Units



Management of our main material topics

Health and occupational safety: given that the health and safety of our employees is of great importance for us, this topic has been positioned as the main strategic axis of our operating model. Therefore, through a comprehensive management model, we have committed to improve on an ongoing basis the safety conditions of our users and employees. We also strive to promote, together with regulatory bodies, a culture of safety among our suppliers and the communities where we work. If you are interest in knowing more about this topic, please check the section "Safety first", where we explain in further detail the practices, policies and programs in which we have invested important resources.

Ethics and integrity: another of our business strategic pillar is the "Corporate integrity", which we have recognized as a basic principle which should characterize the way we do business. We want our customers, employees, suppliers, allies, governments and communities to consider us as a reliable and predictable partner. To this end, we rely on the support and expertise of **IFM Investors**, our controlling shareholder, who is a signatory to the United Nations **Principles for Responsible Investment** and constantly monitors our operation. Our governing bodies are aware of the standards of integrity and transparency that must govern everything we do. These bodies have a direct participation in the decisions that allow the creation of an updated **Corporate Governance** through the approval of corporate policies. The group's internal procedures have been developed so that its governing bodies receive independent information from the Compliance and Internal Audit Departments, which allows them to have an assessment of ALEATICA's compliance status in different aspects of its corporate life. If you are interest in knowing more about this topic, please check the section "Corporate integrity", where we explain in further detail the practices, policies and programs in which we have invested important resources.



Environmental legal compliance: As essential part of our permanence, environmental legal compliance is of vital importance for us; therefore, from the Sustainability Area, through those environmentally responsible for each business unit, we provide punctual follow-up on compliance with the local regulations and standards that must be complied with. If you are interest in knowing more about this topic, please check the section "Social and environmental sustainability", where we explain in further detail the practices, policies and programs in which we have invested important resources.

Road and citizen safety: In 2021, we consolidated the Accident Reduction Program (PRA, for its acronym in Spanish), which establish ALEATICA's Road Safety Strategy for the next five years, treating the accident rate as an integrated element. With the above, ALEATICA joins the accident reduction commitment of the "Decade of Action for Road Safety", recently renewed for 10 more years (2021-2030). Despite the existing limitations, we implemented the "We Are All Road Safety Education" program in some business units, which seeks to contribute to the reduction of road accidents, creating awareness of the road culture in the communities, through training on road safety and responsible driving for employees, customers and communities. If you are interest in knowing more about this topic, please check the sections "Safety first" and "Social and environmental sustainability", where we explain in further detail the practices, policies and programs in which we have invested important resources.



Service excellence: For ALEATICA, our customers are the main focus of our operation and the service we provide. Therefore, we focus on meeting their requirements and fulfilling the expectations they have when using our roads and ensuring that they have a first class experience. We have achieved that by redefining our culture towards a **Customer Experience (CX)** focused on providing our customers with safe comfortable and agile journeys. In 2021, **Transversal Customer Experience Committees** were created in Mexico, whose objective is to develop, prioritize, approve and follow up on projects focused on the needs and requirements of the customers when using our services, seeking **to improve the experience**, and at the same time, the internal processes to solve high-impact complaints. If you are interest in knowing more about this topic, please check the section "Service excellence", where we explain in further detail the practices, policies and programs in which we have invested important resources.

Evaluations and Recognitions

At ALEATICA, our goal is to improve year by year, using the feedback from the Global Compact and following the new guidelines and international standards of Sustainability. This is the second consecutive year ALEATICA has reached the Advanced level at the UN Communication on Progress Reports (COP).

In 2021 we participated in different Rankings / benchmarking in ESG issues, and we were positively evaluated and ranked within the sector.



GRESB 2021

- The GRESB assessment is of great value to our controlling shareholder IFM, as it is considered a benchmark for global financial markets, through the evaluation and assessment of ESG maturity worldwide, in aspects related to the performance of investment and infrastructure assets.
- In our first year of participation, we ranked a score of 87/100 and four stars out of five in the Latin American and Caribbean Transportation Companies Sector for our ESG performance in operating assets.



TOPS MEXICO

- ALEATICA was ranked in first place in the construction and infrastructure sector in Mexico in the diamond category of the Ranking of the 2021 Best Socially Responsible Companies in Mexico, awarded by TOPS MEXICO, a leading company in digital marketing positioning and market research.



REVISTA EXPANSIÓN MEXICO 2021

- ALEATICA was awarded second position in the ranking of Responsible Companies in Mexico, determined by Revista Expansión. This ranking evaluates 127 local and global companies and recognizes the best corporate practices aligned with ESG criteria. The methodology used, created in conjunction with the Schulich School of Business, assesses three key aspects:
 1. Corporate governance, ethics and compliance, wages and salaries.
 2. Diversity, employment practices, employee health and safety, and social responsibility.
 3. Carbon emissions management, waste production and use, energy and renewable energy use.
- Likewise, in Mexico Revista Expansión ranked our Toreo offices third among the Best Places to Work in 2021, due to our new way of working.

These recognitions endorse our commitment to continue promoting the best sustainability practices, with a view to reducing our environmental footprint, improving risk control and mitigation, as well as the health and safety of our employees, and acting as an agent of well-being for the communities in which we operate

Alliances for Development

GRI: 102-13

As part of our strategy to improve our relationship with the communities where we operate, as well as with our stakeholders, some of the alliances we have established are:



LEED certification from the U.S. GREEN BUILDING COUNCIL for the offices in Parque Tereo.



Save the Children, CONMEX.



Mexican Red Cross, We All Are Road Safety Education Program, CONMEX.



Fundación John Langdon Down (FJLD), ALEATICA.



Asociación Civil Vida y Familia Puebla (VIFAC) LEP

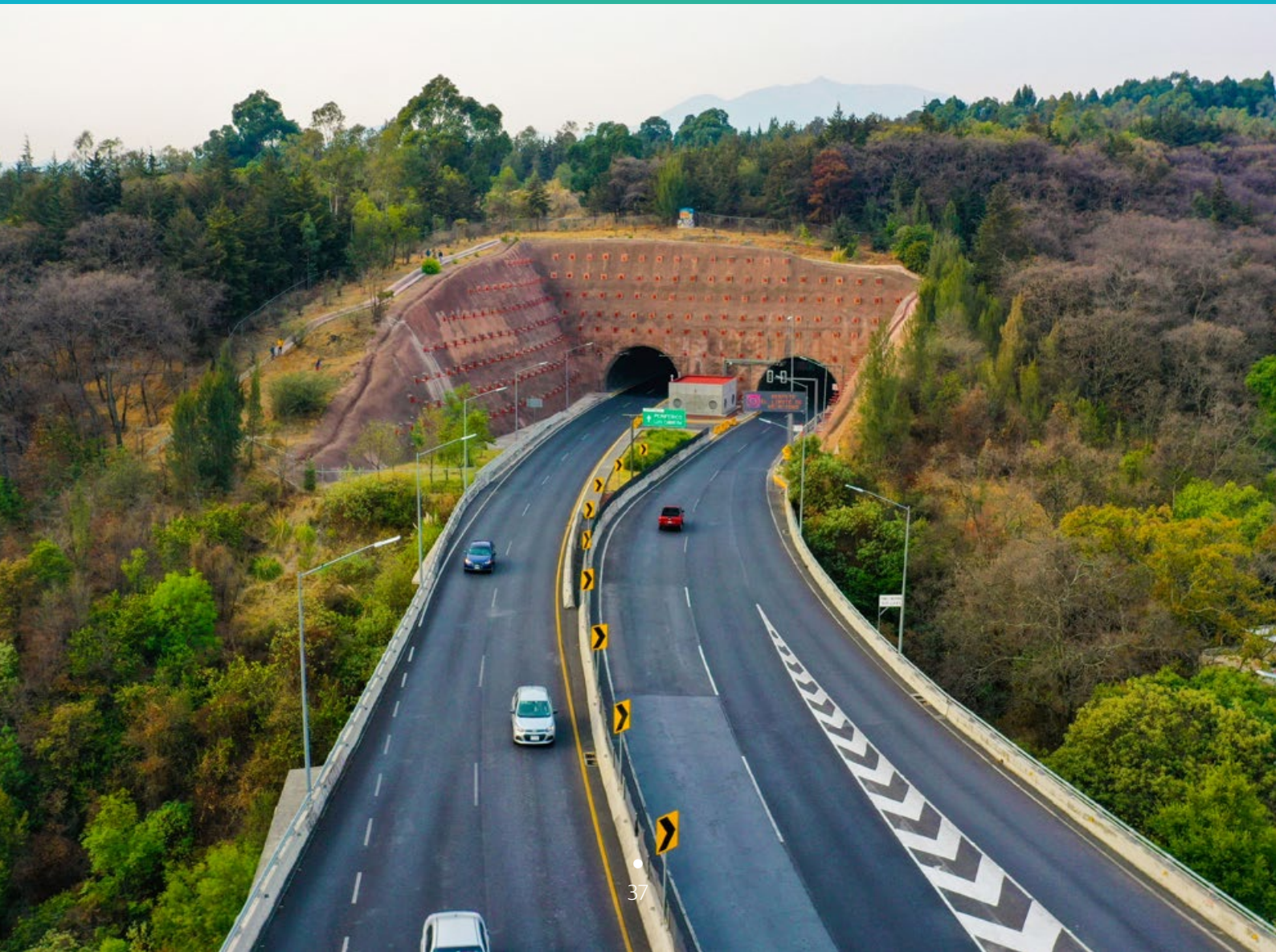


Asociación Civil de Ectagono, Supervía

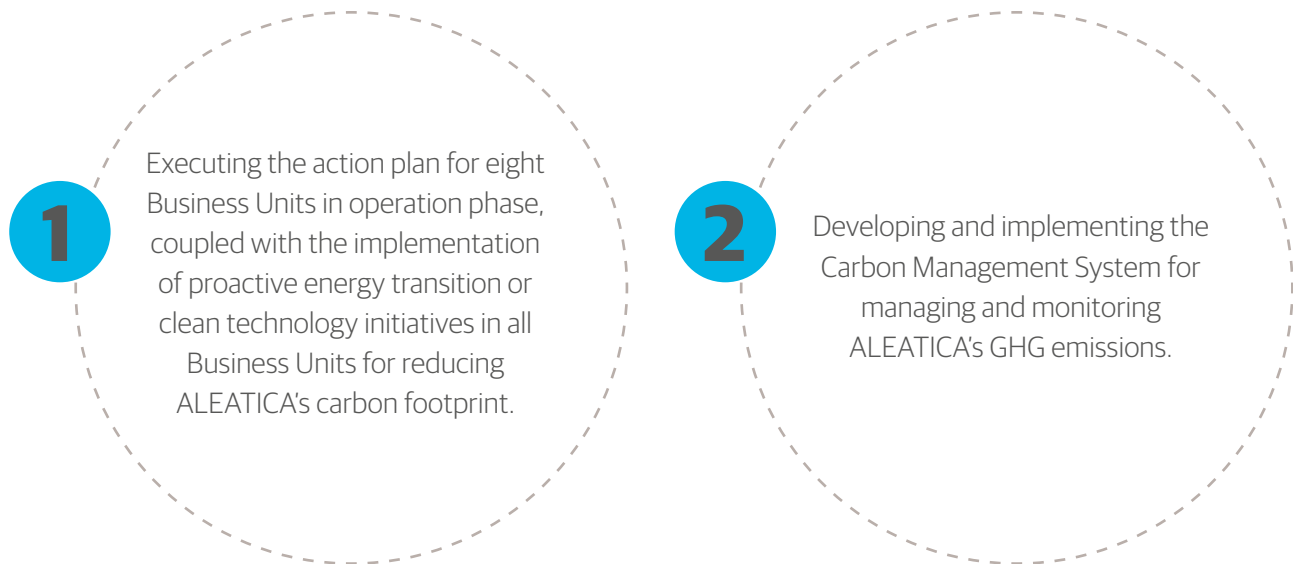
Commitments and future goals

During 2022, ALEATICA seeks to implement the following actions in **Sustainability**:

- Developing and implementing social and environmental projects and actions under four selection criteria: materiality analysis, risk mitigation, environmental compliance and proactive actions that generate a positive impact to our identified stakeholders.
- Evaluating the social and environmental impact generated by the implementation of projects and actions.
- Setting targets to increase ambition and accelerate progress with measurable impact of the SDGs, under the methodology of the SDG Ambition Accelerator initiative proposed by the UN Global Compact.
- Participating in ESG evaluations to obtain recognitions, awards and rankings, among others, in order to be a benchmark in best sustainability practices for our stakeholders.



Specifically for our **Strategic Mitigation Plan**, we are committed to work on the following steps:



Finally, regarding ALEATICA's Management System, we have the following commitments for the next few years:

- Improving our processes, policies and internal regulations.
- Implementing the Environmental Management System under ISO 14001:1.
- Implementing the Sustainability Management System under ISO 26000.

Taxation and tax contribution

GRI: 207-1, 207-2, 207-3, 207-4

ALEATICA has a defined tax strategy, based on the following pillars:



SUSTAINABILITY

Commitment to timely compliance with all tax obligations generated as a result of our economic activity, in accordance with applicable local and international regulations, as well as our unwavering involvement in contributing to economic and social development in the different jurisdictions in which the Group is present, through the timely payment of taxes in accordance with the applicable regulations at all times.



TRANSPARENCY

Provision of accurate and complete information to our stakeholders, including information regarding the Group's tax contribution in each of the markets in which it operates, as well as a fluid and cooperative relationship with each of the administrations with which it is related.



PRUDENCE

All the Group's tax positions are based on sound economic grounds, avoiding abusive tax planning schemes or practices and always bearing in mind the precautionary principle in the face of risk assumptions.



RISK CONTROL

Potential tax risks are incorporated into the Group's integral risk management system to be monitored, and all appropriate measures are taken to minimize them.

Governing body responsible for tax strategy

The Board of Directors of ALEATICA SAU is responsible for approving those measures that make up the Group's tax strategy. In this matter, ALEATICA SAB follows the guidelines set forth by ALEATICA SAU.

Tax focus in the organization and regulatory compliance

The tax strategy is fully oriented towards the optimization of our business, seeking to create sustainable shareholder value.

To this end, the tax area and the responsible functional areas work in a coordinated manner, allowing a joint vision when making decisions, including the evaluation of risks in tax matters, as well as tax planning aimed at a legitimate optimization of resources under the premises of the strictest legality.

Taxation and stakeholders

The principle of transparency, one of the pillars of the Group's tax strategy, includes maximum cooperation with the tax authorities that oversee economic activities in each of the jurisdictions in which the Group operates, seeking to minimize potential tax discrepancies as much as possible.

In addition, priority is given to non-litigious alternatives for the resolution of conflicts when possible and the possibilities offered by legal procedures to promote agreements with the administrations.

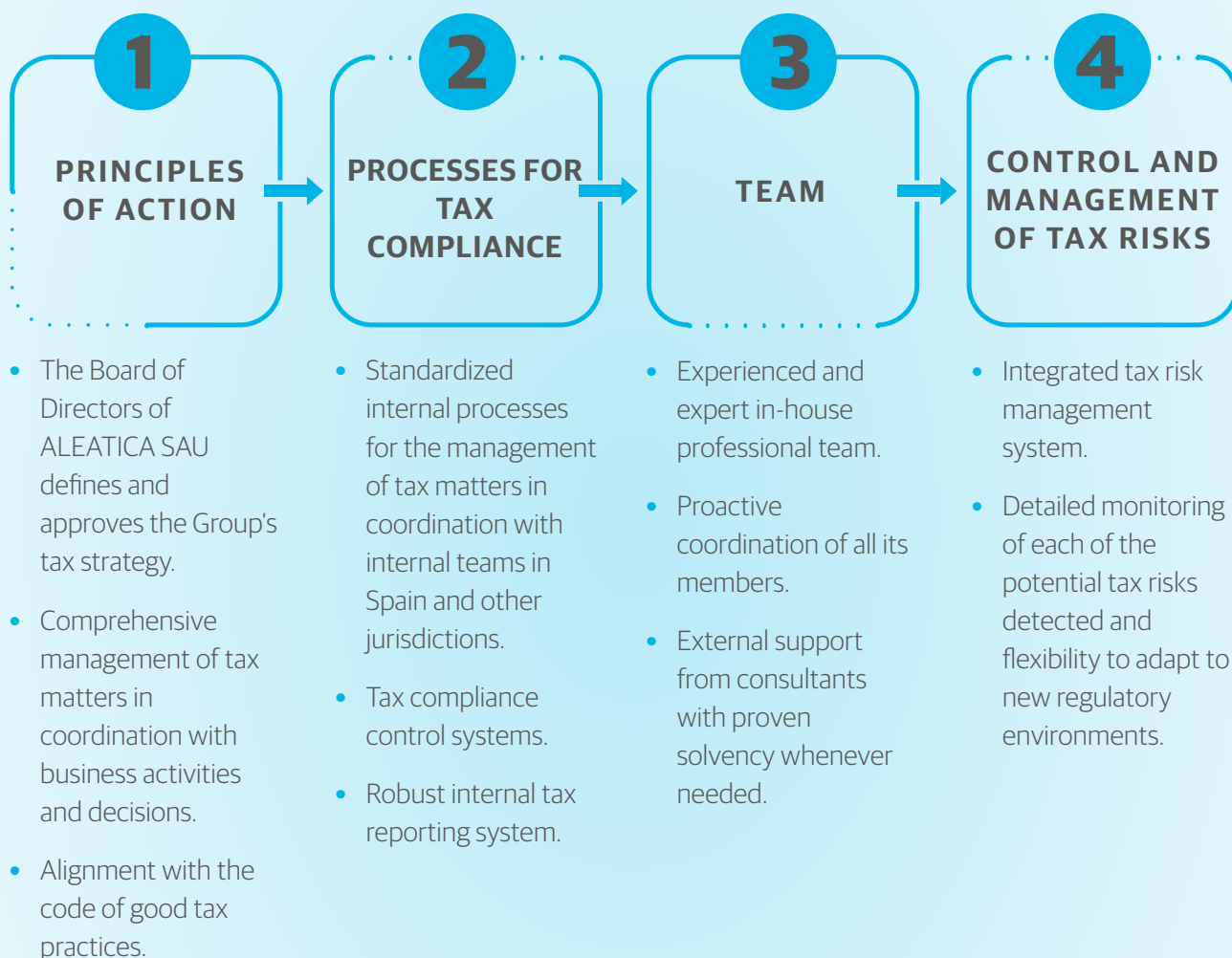
Tax risk management approach

Potential tax risks are incorporated into the Group's integral risk management system to be monitored, and all appropriate measures are taken to minimize them.

To this end, the Group's tax area works in coordination with the Internal Risk Department to ensure the correct incorporation of tax risks in the corporate risk matrix, as well as their adequate monitoring and evaluation.

Compliance with tax governance and control framework

The tax control framework is based on the following pillars



Tax-related complaint mechanisms

Our commitment to transparency is reflected in the promotion and adoption of the best international corporate governance practices and the transparency mechanisms necessary to guarantee a reliable and equitable service to our clients, customers and communities, such as the **Code of Ethics and the Anti-Corruption Policy**, both of which are public corporate documents available on our website.

In addition, an **independent Ethical Channel** has been set up where, in a reliable manner, criticisms or complaints can be channeled to improve the corporate integrity to which the Group aspires.

Difference between corporate income tax accrued on profits or losses and taxes assessed

The permanent differences relate mainly to:

- Expenses considered non-deductible for tax purposes.
- Allocation and application of provisions.
- Withholding taxes paid abroad.
- Consolidation adjustments.

The deferred taxes recorded are due to:

- Differences between accounting and tax regulations with respect to the timing of recognition of certain expenses and income, mainly due to the allocation and application of provisions adjusted in prior years, other income not computable for tax purposes and the difference in the depreciation criteria for non-current assets.
- The adjustments made in the consolidation of the financial statements.
- The difference that exists in companies with a Contracted Return clause between the total profitability and the income recognized for tolls.

Contributions to political parties and/or representatives

In 2021 ALEATICA has not made any contribution or the like to any political party and/or representative in all its Business Units and/or in its resident entities for tax purposes, in compliance with our policies that prohibit it.

Tax Contribution

GRI: 207

Transparency and tax responsibility are fundamental pillars in our **Tax Policy** and, therefore, in the management of all our economic activity. These principles are embodied in our diligence in complying with all tax obligations, including taxation and collaboration with the Tax Authorities in each jurisdiction where we operate.

Our economic and social contribution is reflected not only by assuming the payment of taxes of different nature but also by paying to the public coffers of each jurisdiction, taxes and contributions on behalf of other taxpayers as a result of our economic activity such as indirect taxes or withholdings.

Grants

GRI: 201-4

No significant subsidies have been received by ALEATICA SAB during fiscal year 2021.



Main Operating and Financial Results

ALEATICA SAB main results

For ALEATICA SAB, in 2021, all our highways continued with a recovery in the traffic and income levels, which were affected by COVID-19 pandemic. Although urban highways, which are focused on light vehicles, are still under prepandemic levels, in 2021 they showed significant growths compared to the previous year. On the other hand, highways with mixed combination of vehicles showed a slight increase in income growth above the prepandemic levels; as well as traffic increase and income in the double digits for this year with respect to 2020.

Total income in 2021 increased 61.9% to \$10,928 million, compared to the \$6,750 million recorded in 2020. In turn, income from tolls increased 29.4%, from \$6,004 million in 2020 to \$7,768 million in 2021.

This resulted in an increase of 26.3% in the operating profit, from \$2,668 million in 2020 to \$3,370 million in 2021. This variation is mainly explained by the income increase, compensated by an increase of 47.1% in the amortization of intangible assets related to concessions, right-of-use assets and depreciation, from \$1,371 million in 2020 to \$2,017 million in 2021.

Likewise, the EBITDA ⁷ from tolls increased 24.25%, from \$4,045 million in 2020 to \$5,026 million in 2021, with a slight contraction in the EBITDA margin which decrease from 67.37% in 2020 to 64.70% in 2021.

Finally, and as a result of a larger expense in the amortization of intangible assets related to concessions, right-of-use assets and depreciation, and of a larger financial cost arising from the revaluation of debts in UDIs, the net consolidated loss amounted to \$2,029 million, which represents \$1,141 million additional to the \$888 million of net loss recorded in 2020.

At concession level, in 2021, the toll income of Circuito Exterior Mexiquense (CONMEX) reached \$5,074 million, 28.5% more in relation to the \$3,949 million recorded in 2020; the toll income of Viaducto Bicentenario (VB) reached \$752 million, 40.3% more in relation to the \$536 million recorded in 2020; the toll income of Autopista Amozoc-Perote (GANA) reached \$1,179 million, 21.4% more in relation to the \$972 million recorded in 2020; and finally, the toll income of Autopista Urbana Norte (AuNorte) reached \$762 million, 39.1% more in relation to the \$548 million recorded in 2020.

This toll income arises from an average equivalent daily traffic in Circuito Exterior Mexiquense (CONMEX) of 353,892 vehicles in 2021 (an increase of 22.1% vs 289,829 vehicles recorded in 2020), and an average toll per vehicle of \$39.27 (vs the toll of \$37.29 recorded in 2020).

Regarding Viaducto Bicentenario (VB), the average daily traffic intensity increased 32.8% (from 17,052 vehicles in 2020 to 22,652 in 2021), and the average toll per vehicle IMD of the year was \$32.95 versus \$31.04 recorded in 2020.

On the other hand, Autopista Amozoc-Perote (GANA) recorded an increase in the average equivalent daily traffic of 11.4% (from 39,614 vehicles in 2020 to 44,137 vehicles in 2021) and an increase in the average toll per vehicle of 10.7% (from \$67.60 in 2020 to \$74.86 in 2021).

Finally, Autopista Urbana Norte (AuNorte) recorded an average daily traffic intensity of 35,597 vehicles, 27.5% greater than the 27,919 reached in 2020, and an average toll per vehicle IMD of \$34.93, 3%, greater than the one of \$33.92 recorded in 2020.

Below are the main financial indicators of ALEATICA SAB in the last three years:

TOLL INCOME

(million pesos)



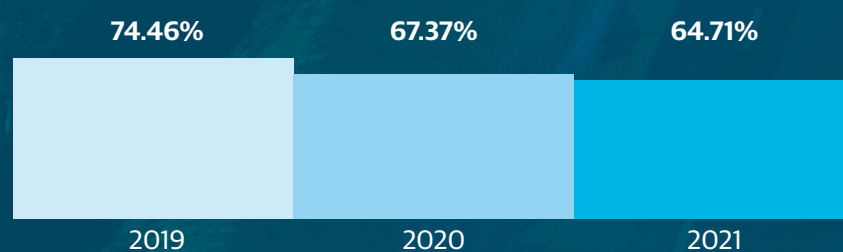
TOLL EBITDA

(million pesos)



TOLL EBITDA MARGIN

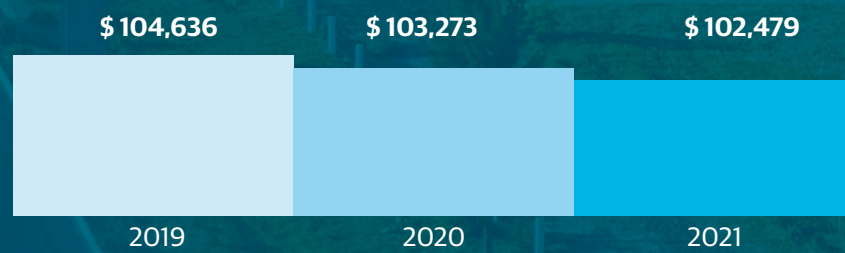
(%)



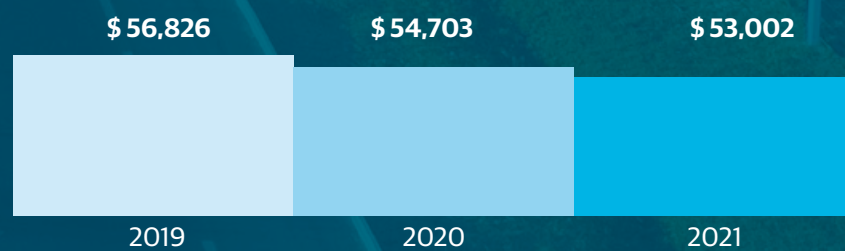
NET DEBT (million pesos)



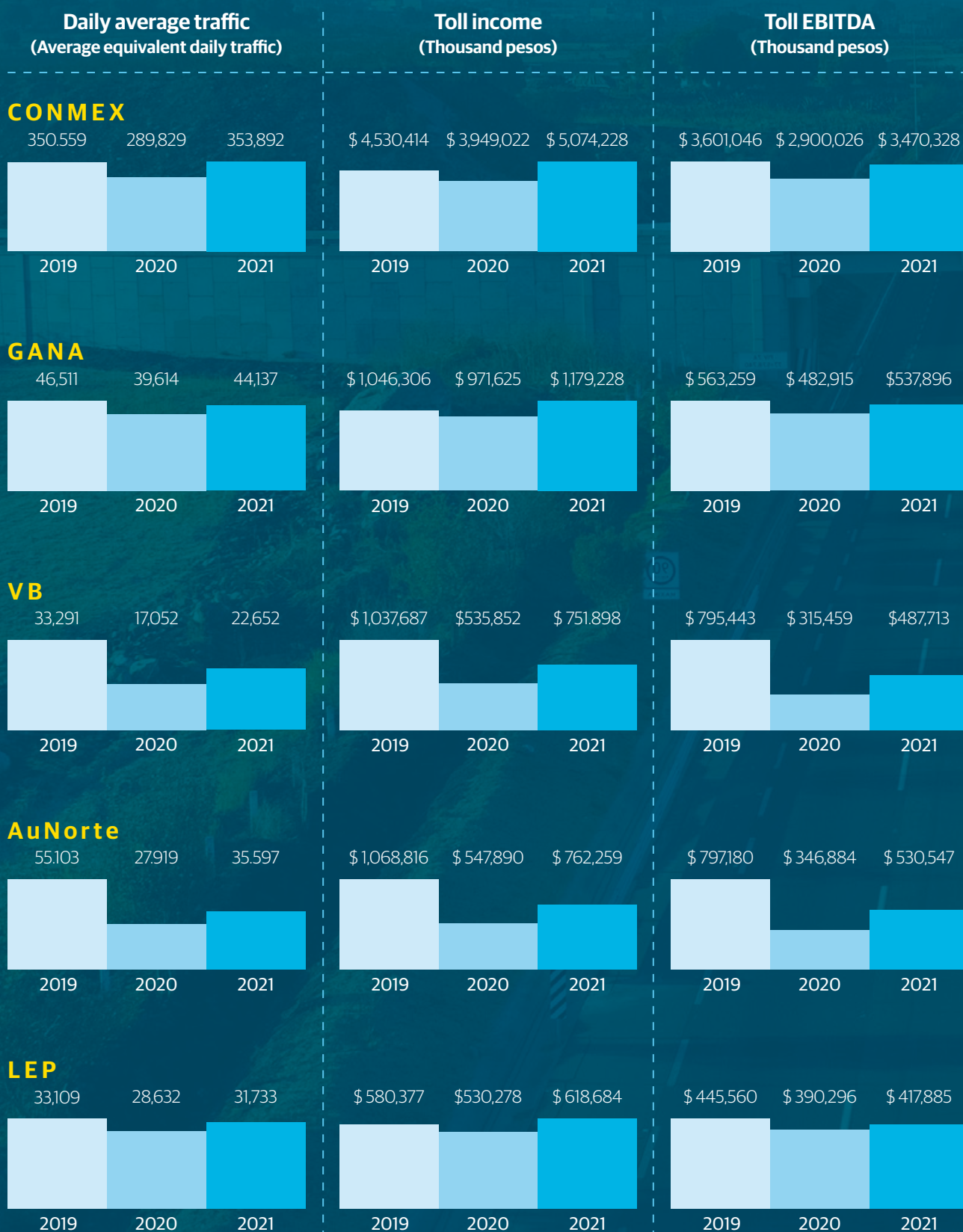
TOTAL ASSETS (million pesos)

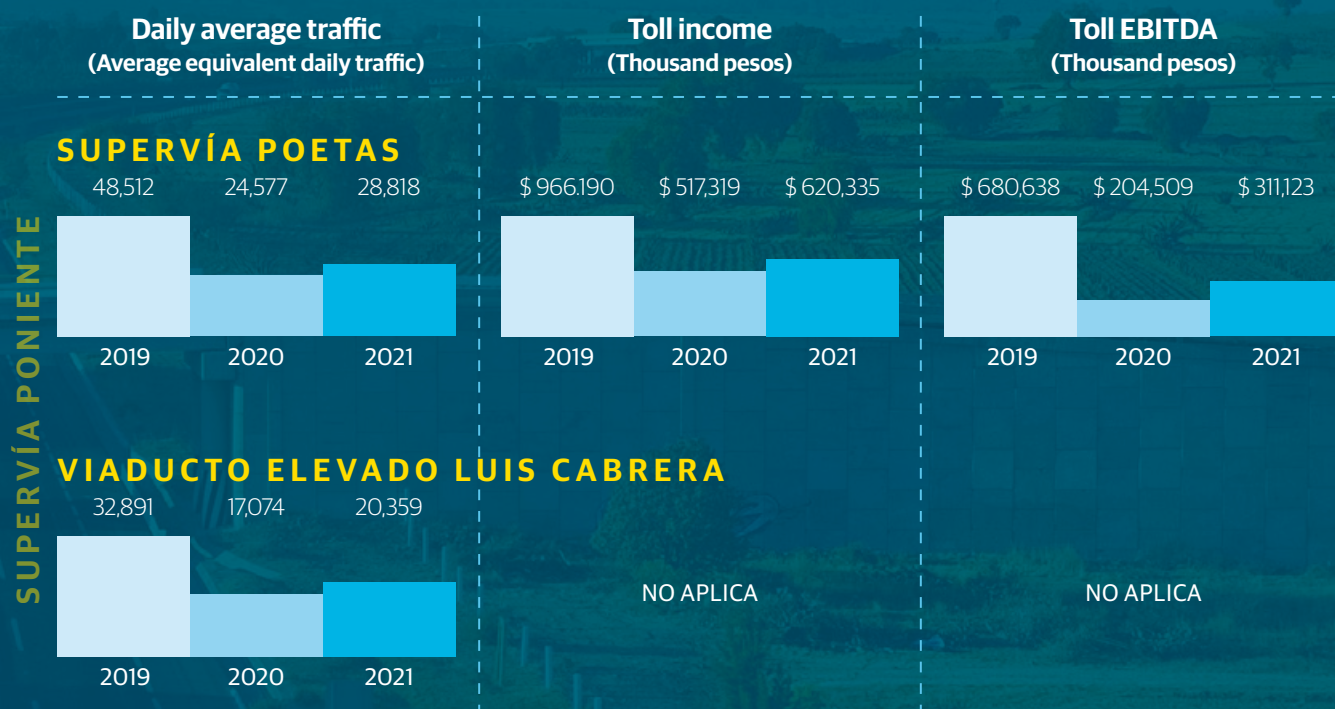


STOCKHOLDERS' EQUITY (million pesos)



Main results per business unit





AT-AT

- This highway is a 77 km project, which purpose is communicating the north and northwest zone of the metropolitan area of Mexico City with Guadalajara-Morelia and Querétaro, through the construction of the Atizapán-Atlacomulco section.
- During the last years, materiality studies have been performed to understand the social impact of the highway in surrounding communities, with the purpose of understanding how to mitigate the negative impacts of the works through social entrepreneurship. As an example of this social labor, in 2020, worked was performed in the Ecotourism Center Project Pueblo Nuevo in the State of Mexico and a donation was made to complete it.
- In 2021 y 2020, the Company continued carrying out joint efforts with the SCT to complete the release of the right of way processes of the highway.

AMAIT

- On February 2020, the Entity received a formal purchase proposal from GACM, which it accepted later. The transaction is subject to the agreement, execution and implementation of the final documents required to carry it out, including the corresponding purchase agreement. Likewise, the transaction is subject to the obtaining of the required corporate, governmental and third-party authorizations.
- To the date of this report, the process has been delayed due to the difficulties involved in the existing COVID-19 contingency. Therefore, once the required conditions are complied with, negotiations with the Federal Government will be resumed to complete the potential transaction.

Best Operational Practices

In year 2021, the implementation of several initiatives has continued, with the main purpose of improving the service level provided to the customers, establishing indicators to identify actions aimed at mitigation of deviations and actions that secure business continuity, through the preparation of a *Business Continuity Plan*. In this regard, below we present the most important actions for ALEATICA SAB, with specific examples of some operations in Mexico:

ITS System

ALEATICA promotes the use of technology through installation of ITS Systems. As the most representative case, in 2021, the installation of the latest generation ITS System in GANA was completed, which has 40 high-definition cameras, 2 weather stations and 6 panels for communication with customers. All these devices are integrated in the Control Center, which provides excellent service to users through its 9-screen video wall. The image below shows the GANA Control Center:



Collection services

In order to improve the process and make it more transparent, in 2021 a **comprehensive audit of the collection service** was conducted in all the Business Units of Mexico through a prestigious consultant. The main purpose was to certify, through an exhaustive analysis of a representative period of time, the collection data obtained automatically from the system and, where appropriate, the detection of incidents so as to make decisions to eliminate them.

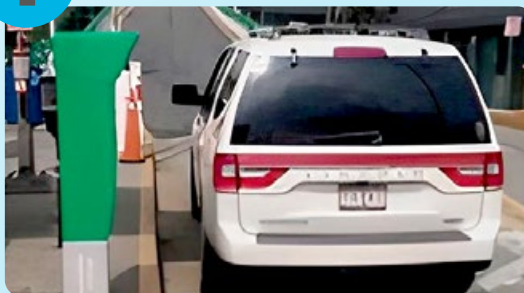
The results obtained are shown in an executive dashboard, in order to qualify each concession and compare its evolution with subsequent audits. Each business unit receives a score according to variables such as: weighted general score, vehicle detection, collection efficiency, electronic toll collection system detection, automatic assembly and toll avoidance control.

Virtual Assistant

Virtual Assistants were installed at entry points of highways. In 2021, the installation of **three virtual assistants** at entry points of urban highways (VB y AuNorte) in Mexico was completed. With the installation of these kiosks, the customer is given a second opportunity to access the highway by reading their TAG device. The implementation complies with ALEATICA's Safety principle, by eliminating the risk of having an employee on the road assisting the customer, as well as with the principles of operational efficiency and state-of-the-art technology. Images below show three examples in VB and AuNorte:

1

PRIMERO DE MAYO



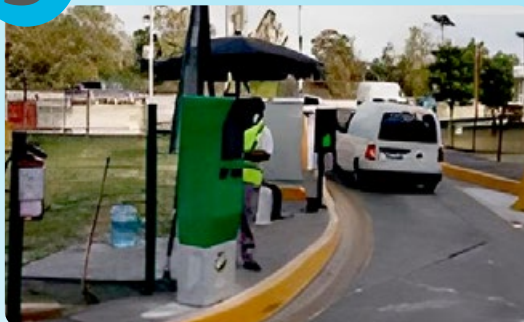
2

SÓSTENES ROCHA



3

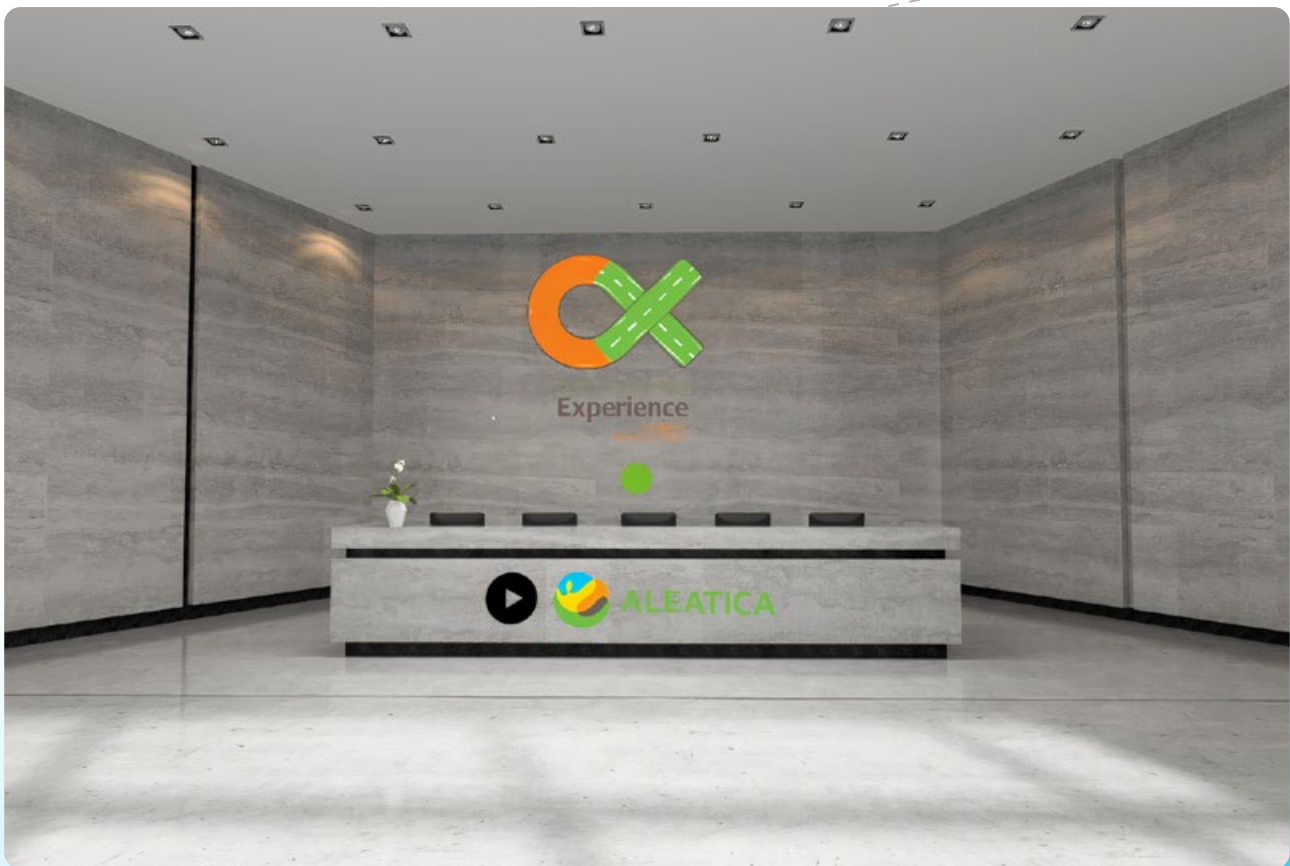
ROSARIO CASTELLANOS



Improvement of the User/Customer Experience

With the objective of developing strategies based on the analysis and interpretation of data, a project called **Customer Experience (CX) Data** has been implemented. It is made up of a multidisciplinary group focused on the development of a commercial strategy to acquire new customers and retain current customers (loyalty).

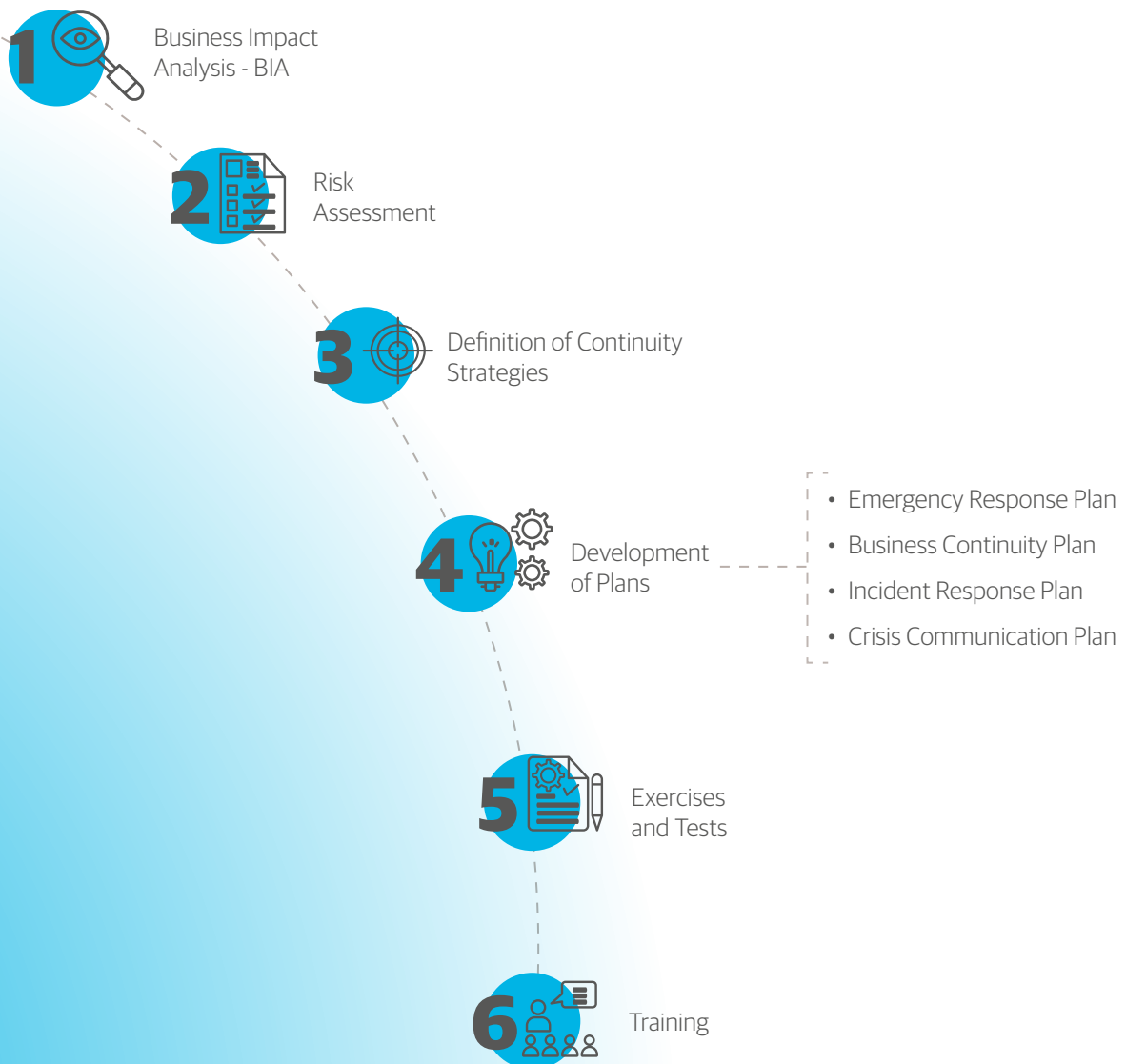
The deliverables were integrated into a virtual platform divided into two main groups: characterization of the road and each toll plaza, and characterization of individual customers and companies. Each of these is subdivided into regional customers and travelers. The analysis has provided insight into the behavior of frequent customers, new customers, old customers and even customers who make a hybrid trip between CONMEX and other mobility options.



Business Continuity Plan

During 2021, the effort to strengthen ALEATICA's operational continuity through the preparation of a Business Continuity Plan for CONMEX and GANA Business Units continued. The Plan consisted of conducting a **Business Impact Analysis (BIA)**, **Continuity Risk Analysis (RA)**, continuity strategy assessment, Business Continuity Plan development

and implementation, and finally, staff training and field testing. The purpose of this Plan is to know how to act in extreme cases in which business continuity is put at risk. The graph below shows the main activities carried out in the **Business Continuity Plan** at **CONMEX and GANA** business units:



SAFETY FIRST

We connect Safety **with the people** **around us**

WE ALL ARE
ROAD SAFETY
EDUCATION
PROGRAM



Safety is our top priority, always. We take care of every customer, every person, always. It is an attitude embedded in ALEATICA's culture.

158 ROAD SAFETY
EDUCATION CAMPAIGNS



SAFETY FIRST

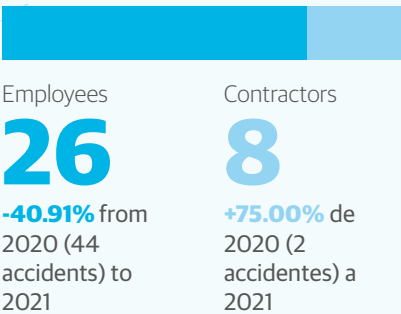
GRI: 103-2, 403, 416-1

Data⁸

GRI: 403

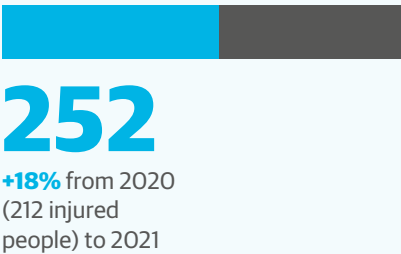
WORKPLACE

Registered occupational accidents

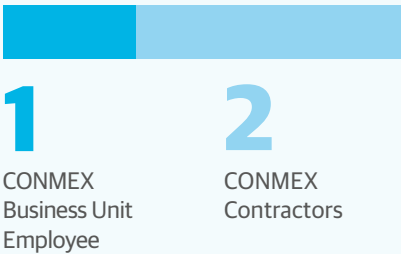


ROAD

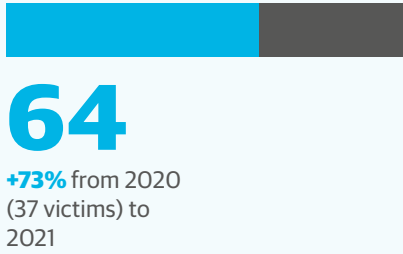
Registered injuries (including traffic accidents)



Fatalities of employees and contractors



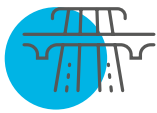
Fatalities in accidents involving customers



Introduction

At ALEATICA, Safety is our priority. Therefore, through our integrated management approach, we are committed to continuously improve safety conditions for our customers and collaborators. We also strive to promote, together with regulatory bodies, a culture of safety among our suppliers and the communities where we work.

Our Integrated Safety Management System optimizes globally and simultaneously:



The quality of our infrastructure and equipment.



The nature of our corporate culture and the behavior of our employees.



The care of vulnerable customers and employees.



The clarity and importance of our signage.

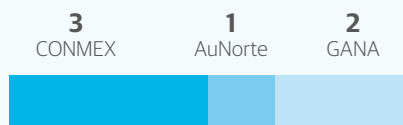


The rapid response of our first aid personnel.



The speed and conditions in which customers can use our infrastructure.

COVID-19 Deaths



6

+500% from 2020 (1 in GANA) to 2021

COVID-19 antibody rapid tests



tests

19,506

+135% from 2020 (8,300 tests) to 2021

Safety training hours



hours

24,216

-1.9% more than in 2020 (24,685 hours)

Main achievements

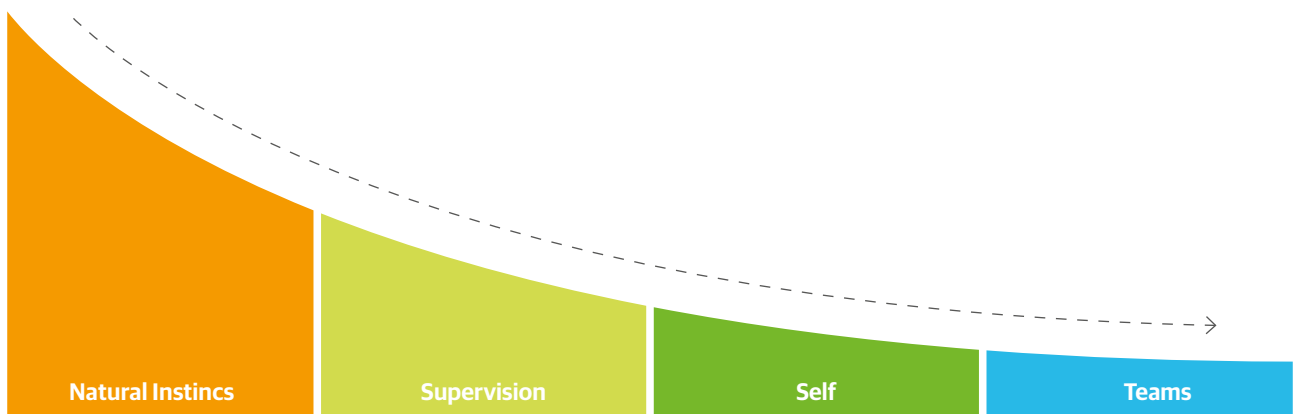
During 2021 we have continued consolidating our Safety strategy, which will position us as a leader in this area in the coming years. This allows us to operate responsibly, avoid risks for our employees and our customers, and ensure the Sustainability of our business. For this reason, along with regulatory agencies, critical suppliers and industry associations, we create a culture of safety and good practices in our operations

Our goal is to achieve excellence in Safety and become a benchmark in our industry, for our customers and our employees.

Safety Management⁹ was consolidated in 2019, and during 2021 its efforts have been focused on promoting all the projects contained in the **Safety First Plan**, aimed at each of our identified stakeholders.

All projects are focused on advancing in the degree of maturity of the Business Units, based on the Bradley Curve measurement standard, where each Business Unit started at a different maturity level and are all striving to reach an Interdependent maturity, where each and every employee of the organization (regardless of level and function) embodies the role of a Safety Guardian.

Injury Rate



Reactive

- Safety by natural instinct
- Only comply with targets.
- Safety is only The Safety Manager
- Lack of the administrative participation
- Training

Dependent

- Management commitment
- Requirement to employment
- Fear/Discipline Rol/ Procedures
- Supervisor
- Group Value
- Training

Independent

- Standards and Commitment to Scope
- Internalization
- Personal value
- Myself care
- Practices, habits
- Individual recognize
- Training

Interdependent

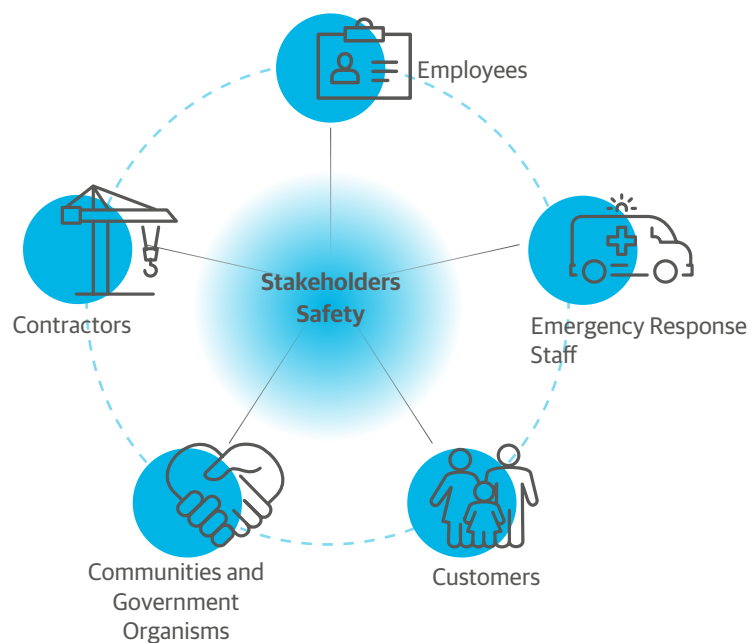
- Help the other one Guardians
- Everyone take care of everyone
- Training
- Proud of the organization



Several safety studies have been carried out by two prestigious international consulting firms

After several Safety studies conducted by two prestigious international consulting firms, **ARUP** and **DUPONT**, great progress has been made since 2018, when the company was in a Reactive status, to date, where it has advanced to a status between Supervised and Independent. Safety performance improvement is a journey, and one that is being jointly led throughout the organization through the **Safety First Plan** projects and what is envisaged in the **Business Plans**.

ALEATICA has always considered the company's stakeholders in its Safety strategy:



The programs and initiatives we have developed for each of our stakeholders are as follows:



EMPLOYEES:

Near Miss¹⁰: The program has been promoted throughout 2021, where all Business Units have reported Near Misses, cumulatively exceeding 1,000 Near Misses per year.

Job Hazard Assessment (JHA): The program was boosted during 2021 and ended in December of that year. The project was delayed due to the pandemic caused by COVID-19.

Stop Cards Pilot: During 2021, a pilot project was launched to expand the **Job Hazard Assessment** in GANA, AuNorte and VB in Mexico.



CLIENTS:

Accident Reduction Program (PRA): During 2021 we continued to implement PRA measures. Many efforts have been made to move forward with planned infrastructure investments in the same year.



CONTRACTORS:

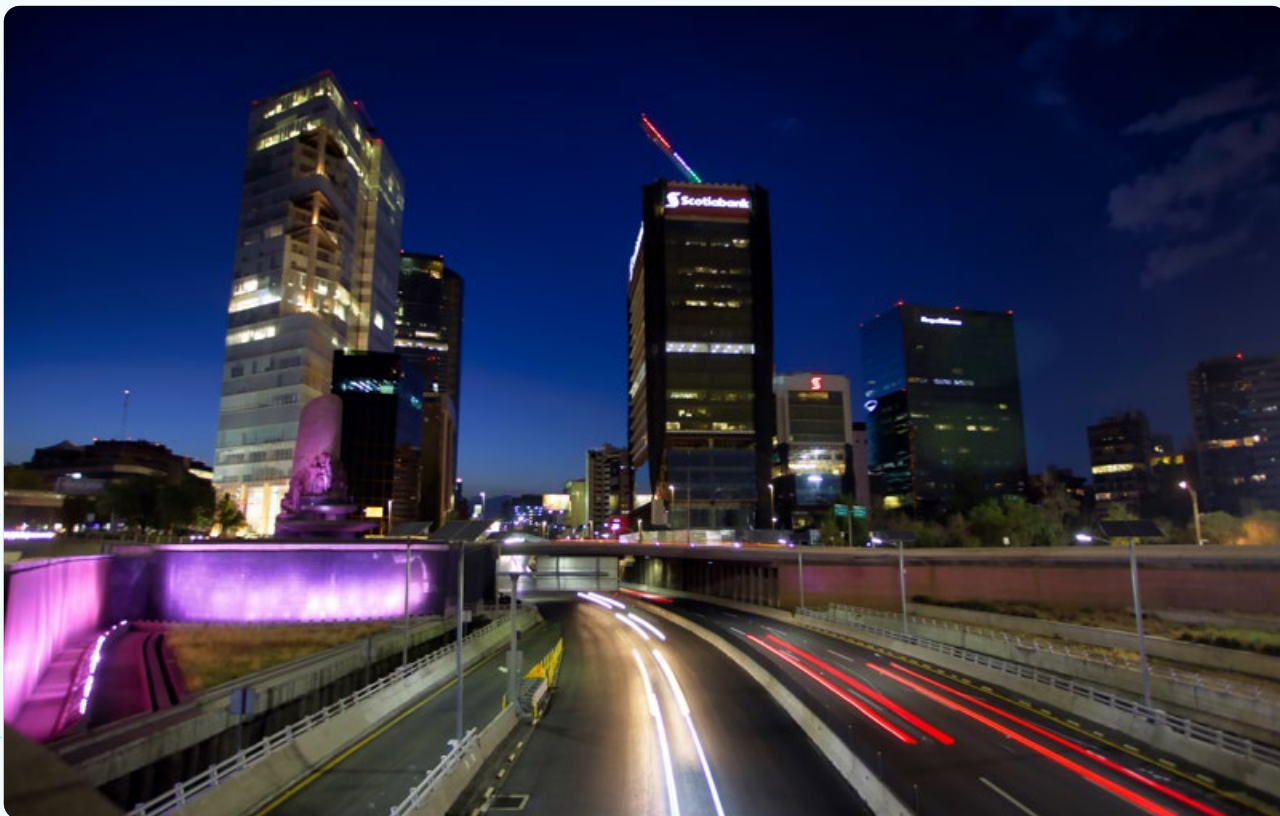
Mandatory Safety Requirements: We have continued managing the **Safety Control Group** to ensure that all contractors, from their procurement process to project execution, comply with all safety requirements.

Safety contract clauses: Assurance of contractual clauses for all contractors.

Biannual meetings with contractors: Biannual meetings have been established with contractors where the attendance of the Contractors' Management is essential. The objective is to communicate ALEATICA's strategy-vision on Safety issues and invite them to be part of this path, joining the company's projects.

Contractor Documentary Control Software Pilot:

A pilot project has been carried out at AuNorte, VB, GANA and CONMEX in Mexico on the contracting of software to control and validate the documentation of workers, machinery and the company. In addition, with this project it is possible to create a credential system that will allow to control access to work areas, through the identification of workers with a unique QR code that will be read on site.



FIRST RESPONDERS:

Alliances with first responders such as the Fire Department, Red Cross, Police and Civil Protection have been maintained in order to improve emergency response and provide our customers with a better service. In the case of Mexico, we are still trying to sign double collaboration agreements with Civil Protection, in order to create Technical Committees to follow up on different actions.



COMMUNITIES AND NON- GOVERNMENTAL AGENCIES:

The Sustainability and Customer Service Department continues to work on agreements with the Red Cross and other entities to carry out road safety courses in school zones in communities near our roads.

Integrated health and safety system

GRI: 103-2, 403-1;

Since the expansion of the **Safety Management System (SMS)**¹ began in 2020 to standardize safety management in organizations, updates have been made to the system's procedures and processes have been increased. Following the Safety studies carried out by ARUP and Dupont Consultants in Mexico, the following improvements were identified:

- **INCORPORATION OF SMART KPIs/ LEADING KPIs:** SMART KPIs (Specific, Measurable, Achievable, Relevant and Time Bound) or "leading indicators" allow us to make early decisions and improve strategies. Therefore, new KPIs related to Near Miss, Job Hazard Assessment and others were incorporated into the DOS-PRCS-07 "Follow-up and Control" procedure.
- **CHANGE MANAGEMENT:** A new procedure has been created, DOS-PRCS-17 "Change Management Procedure", which regulates changes in processes that have impact on Safety.
- **NON-CONFORMITIES:** In order to unify the Non-Conformities process for all Business Units, a new Non-Conformities module will be developed in 2022 within the **ALEATICA Safety Report (ASR) platform**.
- **KNOWLEDGE ASSURANCE** We identified the need to ensure Safety related knowledge within the company, and to this end, procedure DOS-PRCS-05 on Training, Qualifications and Inductions was modified in order to regulate the measurement of employee knowledge through intermediate tests between training processes and to identify whether it is necessary to refresh employees' knowledge.

Esquema Safety Management System

DOS-PRCS

- 01 Hazard identification and risk assessment
- 02 Identification and evaluation of legal and other requirements
- 03 Planning, objectives and reporting
- 04 Internal organization
- 05 Education and training
- 06 Communication, participation and consultation
- 07 Follow-up and control
- 08 Emergency preparedness and response plans
- 09 Accidents, incidents and near miss investigation
- 10 SMS document control
- 11 SMS audits
- 12 Appointments and permits
- 13 Coordination of business activities
- 14 Identification and evaluation of significant environmental aspects
- 15 Client accident investigation_road safety
- 16 Follow-up and control_road safety
- 17 Change management
- 18 Non-conformities and corrective actions



EMPLOYEES

DOS-PRCS: 01, 02, 03, 04, 05, 06, 07, 08, 09, 10, 11, 12, 13, 17, 18

CLIENTS / ROAD SAFETY

DOS-PRCS: 03, 10, 11, 15, 16, 17, 18

SMS DOS-MANU-01
SMS Guideline

ENVIRONMENT

DOS-PRCS: 02, 03, 06, 07, 08, 09, 10, 11, 14, 17, 18

CONTRACTTORS

DOS-PRCS: 03, 06, 07, 10, 11, 17, 18

Safety Management System Schem

SMS Controls

Holding

- Monthly Reports
- Quarterly Reports
- ALEATICA Safety Committee

Common

- Annual safety planning
- Annual safety objectives
- Annual safety report
- Identification and evaluation of legal and other requirements
- Hazard Identification and Risk Assessment
- Annual training and induction plan
- Occupational accident investigation reporting
- Delivery of personal protective equipment
- Identification and evaluation of significant environmental aspects
- Annual non-financial information report campaign
- Calculation of carbon footprint
- Monitoring and control of environmental KPIs
- Monitoring compliance with environmental legislation
- Medical exams
- Anti-doping (*depending on country legislation)
- Workers Safety Committee
- Global Health Committee
- Global Safety Committee
- Industrial Hygiene Studies
- States of Applied Psychosociology
- Emergency plans and controls related to emergencies
- Informational campaigns
- Internal safety audits

Business Unit

- IMSR contractors
- Verification of equipment
- Company Security Committee
- Operational controls of machinery, chemicals, manual tools, signaling elements, elevation, etc.
- ARP (Accident Reduction Program):
- *Roads. Client/user accident investigation reporting

ALEATICA's strategy is to achieve ISO 45001 certification for all of the Group's Business Units by 2023. Some are further along in the process of obtaining it.

AuNorte, Viaducto Bicentenario (VB) and GANA were certified in 2021. By 2022, we plan to achieve certification for **CONMEX and Supervía Poniente**. In 2023, the other Business Units will be planned.

ALEATICA SAFETY INDICATORS

100%

2,000

Total number of ALEATICA Employees of Mexico Units

100%

2,000

Total number of ALEATICA Employees of Mexico Units whose occupational health and safety system is subject to internal audits

26.85%

537

Total number of ALEATICA Employees of Mexico Units whose occupational health and safety system is certified by a third party ¹²

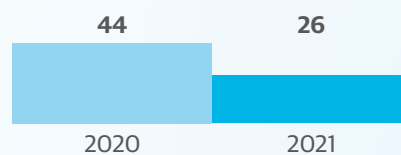
Hazard identification, risk assessment and accident investigation

GRI: 403-2, 403-9, 403-10

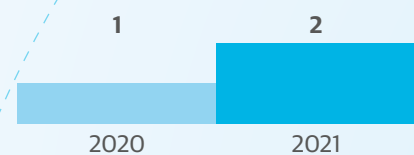
During 2021, there has been an improvement of 40.91% in the Lost Time Injury (LTI)¹³ indicator compared with 2020:

ALEATICA SAFETY INDICATORS

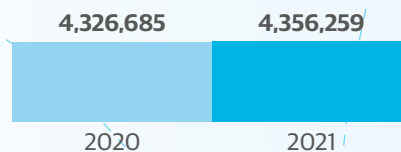
Number of occupational accidents with sick leave (LTI¹⁴)



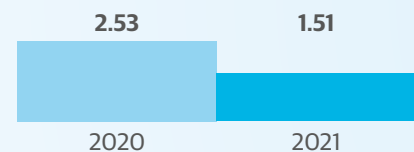
Number of contractor occupational fatalities



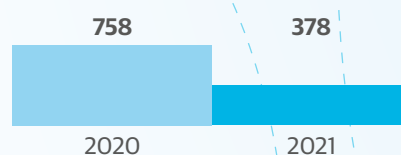
Number of accumulated working hours



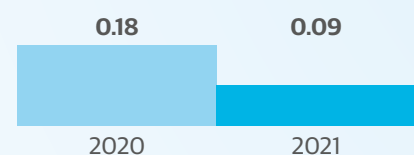
Incidence rate (LTIIR, Lost Time Injury Incidence Rate)



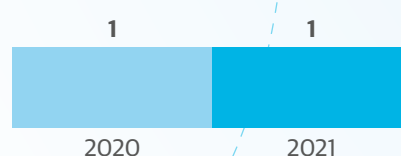
Number of days lost due to accidents with sick leave



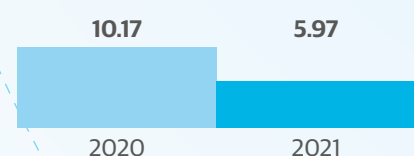
Injury Severity Rate (LTISR, Lost Time Injury Severity Rate)



Number of employee fatalities due to occupational activities or illnesses



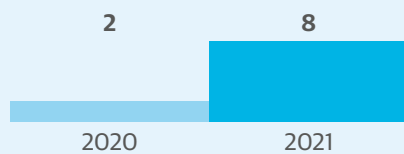
Frequency rate (LTIFR, Lost Time Injury Frequency Rate)



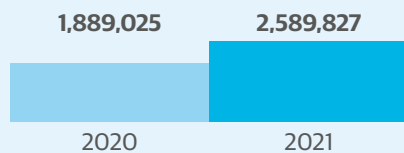
Of the 26 occupational accidents resulting in sick leave, 2 (7.69%) were suffered by female personnel and 24 (92.31%) by male personnel

ALEATICA SAFETY INDICATORS - CONTRACTORS¹⁵

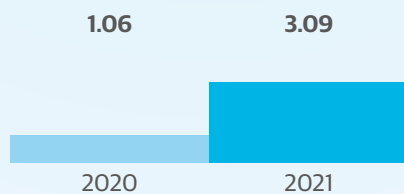
Number of work accidents with sick leave



Number of accumulated working hours



Frequency rate (LTIFR, Lost Time Injury Frequency Rate)



In 2021 we consolidated the use of the **ALEATICA Safety Reporting (ASR)** platform, through which all accidents and incidents are recorded, allowing us to investigate and identify the root cause of incidents and accidents and to propose corrective measures to address, follow up and close them.

A new occupational accident module has been incorporated in 2021 for contractors, where all communications and accident investigation reports of contractors' employees must be uploaded. More modules are planned for 2022, such as Non-conformities. This consolidates the platform as a unifier of all Safety reporting processes, where the necessary modules will be expanded as necessary.

The joint analysis of the data is a great step forward for the area since it allows training and education efforts to focus on the major causes of incidents and accidents.

During 2021, we continued the initiative to communicate Global Lessons Learned, through the institutional mailing safety@ALEATICA.com. The lessons learned in Health and Safety matters that have been recorded are as follows:

- Lesson 6: Shock Absorbers
- Lesson 7: Caution in Live Traffic Track Work
- Lesson 8: Results of Fixed Booth and Entry/Exit Shock Absorbers
- Lesson 9: Preventive Measures when Performing Electrical Work

Injuries, fatalities and illnesses

GRI: 403-9, 403-10

In Mexico, an improvement of 40.91% was obtained in the accident rate for our own personnel with respect to 2020 (44). The most frequent causes of 70% of the accidents reported are:

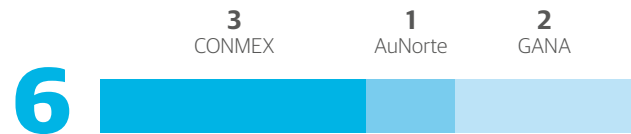
- Falls on the same level
- Blows or mechanical contact with elements
- Blows or collisions with vehicles

There were three fatalities in the CONMEX Business Unit. Two of them occurred in an event classified as non-preventable, since it is related to a user's truck that ran out of brakes. Although this accident was not linked to elements under the company's control, the safe cabin project was activated. This project includes improvements to the vertical and horizontal signage, lighting in the areas of the ticketing and approach booths, and shock absorbers.

The second fatality was caused by negligence on the part of the contractor performing the work and was related to a breakage of the approved lane confinement scheme. Nonetheless, ALEATICA has worked to improve the safety of all contractors operating on our roads.

Regarding work-related illnesses or deaths related to such, no events occurred with our own personnel or with contractors.

Regrettably, seven deceases due to COVID-19 were recorded.



In year 2021,
ALEATICA SAB
has recorded
405 cases of
COVID-19



Safety for our customers

GRI: 103-2, 403, 410

For the Global Safety Management, 2021 has been a key year in strengthening the **Accident Reduction Programs (PRA, in Spanish)**, which establish ALEATICA's Road Safety Strategy for the next five years, treating the accident rate as an integrated element made up of three factors identified as the main precursors of an accident: Road Factor, Customer Factor and Vehicle Factor.

With the above, ALEATICA joins the accident reduction commitment of the **"Decade of Action for Road Safety"**, recently renewed for 10 more years (2021-2030).

The investments contemplated in the PRA (2020-2024) for Mexico amount to **1,297 million pesos**

Business unit

Million pesos

CONMEX

660

GANÁ

477

VB & Aunorte

116

Supervía Poniente

31

LEP

13



During 2021, approximately **500 million pesos** have been invested, which marks an increase of 54% in the total investments contemplated in the PRA in Mexico. This includes 200 million pesos invested in 2020. **In 2021 compared to 2020, 150% more has been invested**

As part of the activities carried out at ALEATICA, we highlight the interventions on the pavement with the aim of providing safe routes that guarantee the comfort of our customers.

In addition, we contribute to sustainability, since well-maintained roads help to reduce emissions generated by the vehicles that circulate on them. This allows us to increase, replace and improve the quality of the equipment and the signaling systems present in our concessions.

On the other hand, the **Global Technical Management** is supported by the **Planning, Risks and Reporting Management** together with the **Control and Technical Support Management** within the Operations Management. With this framework, we guarantee the quality of service of our infrastructures throughout their entire life, right from the initial investment stage, through the

operation phase to the final stage, when the concession is returned to the concession holder under the minimum conditions established in the concession title.

To this end, the Global Technical Department provides support in preparing and monitoring the planning and economic control processes, as well as in managing the technical risks associated with the activities of the operating and investment companies, relying on a multidisciplinary team of specialists that coordinates and supports the execution of the most relevant technical projects conducted within the Business Units.

At ALEATICA, safety is our priority. Our main objective is to achieve excellence in safety and thus become a benchmark for both our customers and our employees, always based on operational excellence.

Our pillars of Safety, Customer Service and Sustainability are continuously present in any of the phases of our concessions, from the engineering stage to the operations phase.

Throughout 2021, we have continued with the execution of the main works in the Business Units that are in the investment phase, while continuing to develop the maintenance works included in the long-term maintenance plans of each of our concessions in the Business Units that are in the operation phase.

In general terms, in order to increase the safety and quality of future service, we have implemented the following general measures:



Improving initial designs by modifying geometry, radii of curvature, camber, etc.



Increasing safety factors considered in the original designs.



Updating the type of lighting to more environmentally sustainable systems.

One of **ALEATICA's Global Technical Management** main objectives is to ensure compliance and monitoring of the contractual indicators during the investment and operation phases and throughout the life of the Business Unit, with the least possible impact on the customers.

In this line, said department has collaborated with different Business Units in the process of implementing the Toll Road Management System, which, through data entry and calculation of metrics, contributes to the monitoring and fulfillment of these indicators.

In addition, **ALEATICA's Global Technical Management** has worked very actively with the CONMEX in designing the construction of the main access to the Felipe Angeles International Airport, optimizing both design and construction procedures, as well as planning the execution of the works. We have kept up processes to verify that construction contracts include safety clauses associated with the type of work, and the review of these plans is carried out by an independent group appointed for this purpose. We have also established independent supervisions and quality controls to contractors, which allow us to verify that the actions are executed with quality and guarantee an improvement in the customer's experience when using our infrastructure, always complying with the approved safety plans.



Each and every action we carry out during major maintenance, we strive for an intrinsic improvement of the service to our customers, as well as a reinforcement of safety



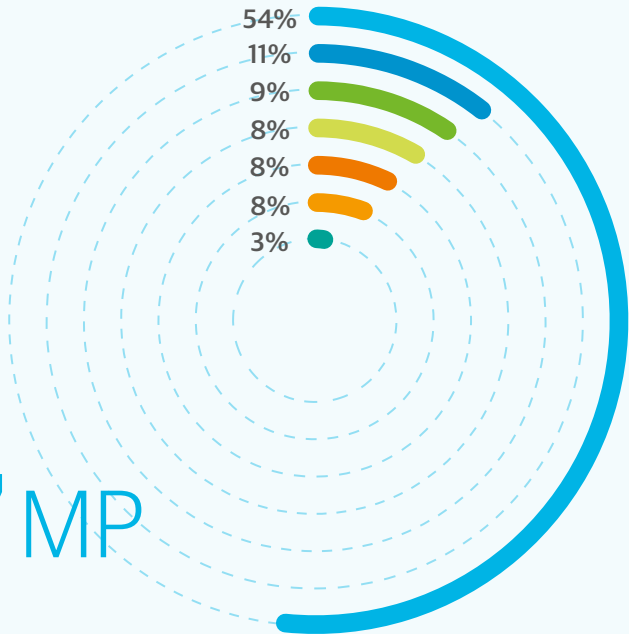
During the bidding processes, the technical evaluation is very important in the final choice of each bidder, with the aim to achieve optimal quality of the final infrastructure. In those bidding processes where safety is relevant due to the nature of the works to be executed, we have continued evaluating the security strategy and approach as an important element for the final qualification of the bidder.

We have also continued to have regular multidisciplinary meetings in which the Technical and Safety areas of both the Business Units and ALEATICA are present, since we are directly responsible for providing our customers and employees with a safe and efficient transport service.

We perform periodic inspections and maintenance of all the elements of the road, as well as studies of our assets in order to prevent, optimize and improve our infrastructures.

Investment in Mexican companies

- Flooring
- Civil Works
- Safety
- Equipment
- Studies
- Structures
- Other



1,217 MP

Structures Civil Works

Road factor

Infrastructure is the most relevant factor in terms of the investment involved. Most of the investments aimed at the road factor will be undertaken by the Major Maintenance area of the Technical Management, which also provides internal expertise. External consultancies, such as the one contracted for the iRAP¹⁶ studies, will be essential to obtain an independent perspective.

Improving safety standards will be achieved through actions and initiatives such as road signaling, lateral and frontal contention systems, Intelligent Transportation Systems (ITS), lighting and paving

Some examples of initiatives launched in 2021 are:

Installation of fixed shock absorbers for toll booths and entrances/exits.

Investment: Approx.

44 MP

Number

225

units installed in Mexico alone



Investments in IT and Control Center, GANA in Mexico.

Investment: Approx.

154 MP





Improvements to urban road links in Mexico

Investment: Approx.

4.9 MP



Investments in barrier terminals and side containment barriers, GANA in Mexico.

Investment: Approx.

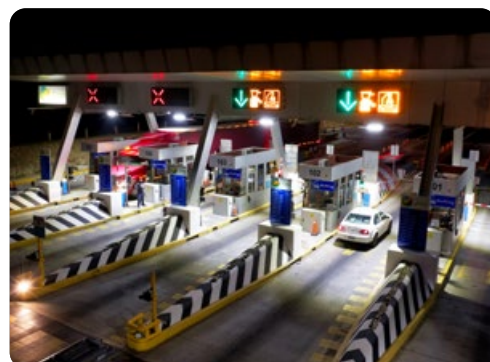
154 MP



Improvements in safe cabins project, GANA in Mexico.

Investment: Approx.

66 MP



Improvements in signage in accident concentration spots, CONMEX in Mexico.

Investment: Approx.

44 MP

Customer and Vehicle Factor

Focusing on the customer and the vehicle is essential to rigorously execute **Accident Reduction Programs**, to address the customers' driving errors, improve maintenance of vehicles and reduce customer accidents. Some initiatives undertaken by ALEATICA to address customer and vehicle safety considerations include:



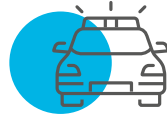
- Road Safety Programs in communities (School Program). WE ARE ALL ROAD SAFETY.
- Health campaigns aimed at customers. Coffee and safe pill.
- Informative campaigns on roads through messages.



- Double collaboration agreements with First Responders (Civil Protection, Red Cross, National Guard, State Police).



- Establishment of Safe Stops and Truck Centers.



- National Guard virtual patrols.
- Accident investigation with virtual reconstruction of events.



Some examples of initiatives launched in 2021 are:

- **Virtual accident reconstructions**

At GANA in Mexico, virtual reconstructions of road accidents were conducted in order to gather information and abstract satisfactory measures for the future.

• Customer health campaign

Customer health campaigns were carried out on the GANA highway in Mexico

Customer Health Campaign Strategy | GANA

Health campaigns towards customers are included within the health initiatives that will be included in the Accident Reduction Plans

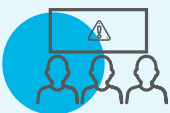
In the week of November 22 to 26, the health campaign aimed at users on the GANA highway was carried out. The campaign had a higher turnout than expected and had a so-called effect in neighboring towns where users frequently use the road. Local news outlets approached the site to document the campaign, which is very positive for the local population who can see this with great eyes, and this can be translated into an increase in future traffic.

Logistics

To make the process more effective, a distributed circuit was conducted in several tents; COVID+MESSAGE AND GIFT+HEALTH+VEHICLE.



COVID TENT: The assigned medical team performed covid tests for nasopharyngeal antigens and immunization tests.



MESSAGE AND GIFT: The users went to a tent where the Road Safety messages that we want them to see are projected. In this same tent gifts were given details that will make the user remember the campaign.



SALUD: The user who wanted, was offered the following service;

- Rapid test for measuring triglycerides.
- Rapid test for cholesterol.
- Glucose measurement.
- Blood Pressure Measurement.
- Heart rate.
- Weight and height control.



VEHICLE: Basic mechanical revisions were performed.

- Water levels.
- Antifreeze levels.
- Brake fluid.
- Tire oil and pressure levels.

Scope



Users Served

250



Vehicles serviced

117



heavy vehicles*

9

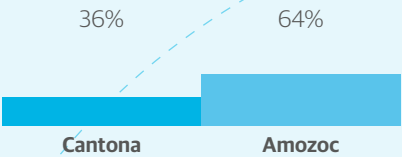


light vehicles

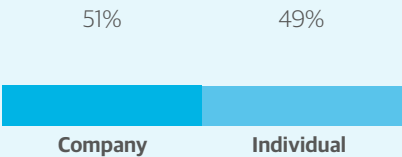
108

Heavy vehicles had a low influx due to the limited space existing in the established stopping areas.

HEALTH



MECHANICAL OVERHAUL



Staff who collaborated in the campaign



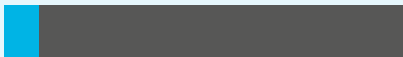
GANa:

35



ALEATICA:

3



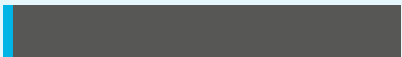
RED CROSS

7



NATIONAL GUARD

3



EXTERNAL MECHANICS:

2

CEM



GANA



- “Don't buy from street vendors” campaign

In line with ALEATICA's security principles, as of January 2020, TeleVía stopped selling Tags on the roads, in areas close to gateways. This practice represented a risk for the staff of the distribution companies in charge of selling Tags, as well as for the customers who were exposed to fraudulent purchases. This decision was supported by communication efforts at AUN, VB and CONMEX highways, alerting customers and inviting them not to purchase Tags on the road.



Safety for our employees and contractors

The stakeholder groups receiving the highest priority and attention in terms of safety, along with our customers, are our employees and contractors. The Safety First Plan includes different projects that will help us move towards a cultural change in terms of Health and Safety in the workplace, where each and every person within the organization is aware of the importance of working safely.

Near Miss Project

The **Near Miss** project has been implemented in all ALEATICA Business Units globally through its development in the digital platform **ALEATICA Safety Reporting (ASR)**. This has been an essential step forward for advancing in the cultural change we want to achieve in Health and Safety.

The main objective of this project is to internalize the identification of unsafe actions and conditions, which, if not solved, could materialize in an incident or accident at work in the future. For the implementation of this platform, two modalities have been proposed:



Standard Near Miss

Unsafe practices and conditions of occupational safety. Launched in November 2020.



COVID-19 Near Miss

Unsafe practices and conditions related to COVID-19 transmission prevention. Near Miss COVID-19 has been very novel and unique in that it allows contagion tracking remotely and efficiently. This Near Miss modality was launched in June 2020.



Near Miss Project

	2020 ¹⁷	2021
Normal	6	603
COVID-19 Near Miss	69	157
Corrective actions	84	744



In 2021, there were 760 Near Misses accumulated and 744 actions planned. This is an excellent result, since, based on international standards, around 60 minor incidents/accidents and two very serious/fatal accidents would have been avoided

Job Hazard Assessment Program

The **Job Hazard Assessment (JHA)** program is, together with the Near Miss, the most important program for ALEATICA and its Business Units oriented to its employees.

The JHA project is mainly based on safety training on risks and daily activities, with some administrative roles receiving virtual training. All Business Units are carrying out preventive measures against COVID-19. For some positions with administrative profile, online training is available.

In Mexico, the scope of the program included 2,022 employees, and the number of employee-hours accumulated was 8,905, 10% more than projected.

- New activities identified: **104**
- New hazards and risks identified: **299**
- Number of modified protocols: **148**
- Number of Safe Work Analyses and Work Permits: **2,664**

In Mexico, the scope of the program is as follows:

Employees reached

2,022

Accumulated employee-hours

8,905

Number of accumulated sessions

401

Safety Stop Cards

As part of the strategy for cultural change in Safety at ALEATICA, the **Job Hazard Assessment** aims to empower employees in Safety and gradually achieve the status of interdependence where each and every employee will be a key player in Safety. The **Stop Cards** pilot, its expansion in 2022 and the **Safety Moment** at noon or during breaks are the next step in the continuation of the JHA to promote employee empowerment.



Safety Stop Cards Process



Credential-type cards where a collaborator is empowered to have the authority to stop any work that is identified as being carried out in an unsafe manner and that may cause an incident or accident.



The cards must be assigned by the Safety Managements with the consent of the Business Unit General Management.



The leaders of the areas must be trained in this process to understand the system and the essentials of the program.



The implementation of this process is expected to improve the LTIFR, LTIIR and LTISR indicators



An incentive/ recognition program must be defined for employees who become part of the STOP CARDS team.



A clear communication process must be established in the event of work stoppage and vice versa (work reactivation).



There must be an analysis and selection of the areas where it is possible to implement the project.

Health Promotion and Health Services

GRI: 403-3, 403-6

2021 involved again a double effort from the medical services, as we had to maintain the health surveillance programs and refocus efforts on COVID-19 prevention/mitigation. During 2021, we performed the following actions:



Health Campaigns (informative only).



Anti-doping as an essential process to ensure the safety of employees and workers in the direct environment (contractors).



COVID-19 Strategy.



We conducted the following health campaigns during 2021:



Flu/influenza vaccination campaigns.



Asperger's syndrome campaign.



Respiratory disease information campaigns.



Health Services

During 2021, the Holding's medical services remained formally operational in the offices of ALEATICA Mexico.

In all the Business Units we have health surveillance, either through our own Prevention Service or through an external Prevention Service.



Global breast cancer awareness campaign for risk awareness and primary prevention.



COVID-19 (ongoing).

COVID-19 Health Emergency Prevention and Mitigation Actions

In 2021, under the persistent health emergency caused by COVID-19, strategies against it have been maintained for the care of employees and the assurance of operations.

The measures we are taking to address this health emergency are as follows:



- 1.** Reinforcement of ALEATICA Medical Services, with a total of **four doctors and two nurses**.



- 2.** Maintenance of the Health Committee, which has been meeting on a weekly basis since April. This committee monitors COVID in each of the countries where we operate, follows up on the cases of our own personnel and proposes and approves prevention strategies.



- 3.** Establishment of different work modalities:
 - a.** 4 days out of 5 (80%).
 - b.** 2 days out of 5 (40%).
 - c.** 100% home office.



4. Monitoring and control of strict care of vulnerable personnel with respect to COVID-19, regardless of whether they are administrative or operational.

5. Performing rapid antigen and PCR tests when applicable under various modalities:

- -PHASE I Monthly testing of 100% of the personnel.
- -PHASE II Weekly testing of 30% of the population.
- -PHASE III Biweekly testing of 15% of the population.



6. Maintenance of the **COVID-Tracker** where the tested, positive and immunized cases are registered in the different work centers, through which we can follow up the employees' quarantines.

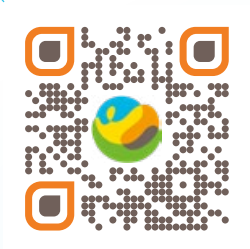
- During 2021, the option of registering vaccinations was added, in compliance with the specifications of the Data Protection Directorate, thus making it possible to make statistical calculations on the population with vaccine-acquired immunity.





7. Maintenance of the two systems aligned with COVID-Tracker to ensure that employees who report to the workplace do not present symptoms of the disease, thus minimizing the risk of contagion in the workplace.

Self-assessment QR



- **Self-assessment APP:** Is an application through which all employees must perform a daily self-diagnosis before reporting to work.
- **Access control TOTEM:** TOTEMs with employee facial recognition and temperature recording.

With both daily controls, we activate the access passes

- 8. Maintenance of COVID-19**
Induction, also associated with the COVID-Tracker, for 100% of ALEATICA employees and its Business Units.



- 9. Maintenance of the Employee Assistance Program (PAE).** In collaboration with the Human Resources area, we have implemented a psychological assistance program for employees and their families, in order to meet the needs that have arisen during the pandemic. The medical service has referred patients to the PAE when risk is identified.

- 10. NON-CASH PROTOCOL.** As part of the COVID-19 strategy, together with the TELEVÍA, CONMEX, LEP and GANA Business Units, we have kept a program to encourage the use of Electronic Toll Collection TAG to reduce manual transactions, thus avoiding contact with cash, which helps to reduce possible contagions. A total of 107,981 top-ups were achieved, thus avoiding contact between cashiers and customers at **853,561 crossings.**



Occupational Health and Safety Training

GRI: 403-5

Topics of the Occupational Health and Safety courses:

1. COVID-19
2. Evacuation
3. Evacuation Procedure
4. Building Evacuation
5. Basic Civil Protection Talk
6. Evacuation and Retreat Course
7. Lighting NOM-025- STPS-2008
8. Safety in the Use of Tools
9. Training on Hand Tools
10. LOTTO Labeling and Padlocking
11. Job Hazard Assessment
12. Job Security and Health
13. Training on Occupational Hazards and Accident Prevention

In Mexico, 24,216 hours of specialized safety training were achieved in the Business Units, 1.9% less than in 2020 (24,685 hours). This centralized training strategy will continue in Mexico throughout 2022



14. NOM-017-STPS-2008 Personal Protective Equipment
15. Specific Personal Protective Equipment Training
16. Training in the Use of Personal Protective Equipment
17. PPE Selection, Use and Handling in the Workplace
18. Active Health Breaks.
19. Handling of Hazardous Chemical Substances NOM-005-STPS-1998
20. Globally Harmonized System NOM- 018-STPS-2015



- 21.** Safety Conditions NOM-001-STPS-2008 Facilities
- 22.** Colors and Signs NOM-026-STPS-2008 Risk Identification
- 23.** Response to Hazardous Materials Incidents
- 24.** Psychosocial Risk Factors NOM-035-2018
- 25.** Ergonomic Risk Factors NOM-036-STPS-2018
- 26.** Order and Cleanliness 5s
- 27.** Road Works Signaling
- 28.** Attention to Road Emergencies
- 29.** Attention to Emergencies (Earthquakes, Fires, Demonstrations, Robberies, First Aid)
- 30.** Handling of Loads and Overstrains
- 31.** Slip and Fall Prevention (PPE and Best Practices for Facilities)
- 32.** Object Entrapment Prevention (PPE and Facility Best Practices)
- 33.** Construction, Safety and Health Conditions in the Workplace
- 34.** Establishment, Integration, Organization and Operation of Health and Safety Commissions (NOM-019-STPS-2011).
- 35.** Road Safety
- 36.** Safe handling of 10 TON cranes
- 37.** Use and Handling of Fire Extinguishers
- 38.** Signaling and flagging
- 39.** Static electricity risks NOM-022-STPS-2015
- 40.** Maintenance of electrical installations NOM-029-STPS-2012
- 41.** First Aid
- 42.** Defensive driving training
- 43.** Backhoe and boom training
- 44.** Heavy machinery handling training
- 45.** Fire prevention and firefighting (NOM 002 STPS)
- 46.** Safe use of machinery (NOM-004-STPS)
- 47.** Manual handling of loads (NOM-006)
- 48.** Electrical safety (GROUNDING NETWORK NOM-022-STPS)
- 49.** Safety in work at heights (NOM-009-STPS)
- 50.** Safety in cutting and welding (NOM-027-STPS)
- 51.** Safety in confined spaces (NADF 033)
- 52.** Recognition, evaluation and control of chemical pollutants in the work environment.
- 53.** Road Safety (attention to road emergencies).
- 54.** Functions of the Flagperson¹⁸
- 55.** Signaling of Road Works and Incidents
- 56.** Backhoe and Boom

Participation, Consultation and Communication of Health and Safety Services

GRI: 403-4

In 2021, through ALEATICA's **Safety First Plan**, we maintained the different initiatives for employees that will ensure effective participation.



Maintenance of employee Safety Committees.



Safety communication boards.



Mail safety@ALEATICA.com.



Graphic communication material.



One ALEATICA monthly newsletter, reinforcing Safety-related articles



Job Hazard Assessment Program.



Near Miss.

In 2021, the committees continued to operate as follows:

WORKERS' HEALTH AND SAFETY COMMITTEE/COMMISSION.*(Committee 1)***Composition:** Workers**Liaison with Committee (2):**Responsible for *Safety* of the Business Unit.

Matters: Discuss, review, and recommend different applicable points of the safety program. Talk about the process of implementing preventive culture, near miss processes, incidents or accidents that have occurred, deficiencies that have been detected. Proposals for accident reduction.

Meeting frequency: Monthly**SOCIETY HEALTH AND SAFETY COMMITTEE.***(Committee 2)***Composition:** Directions and Managements**Liaison with Committee 3:** Responsible for *Safety*

Matters: The points discussed in the Workers' Safety Committee are exposed. The planning and *safety* objectives set are monitored. Budget is allocated for different Initiatives and Safety compliance. Follow-up of Incident trends, work accidents, road accidents and Near Miss. Follow-up of corrective actions

Frequency: Monthly**ALEATICA GLOBAL HEALTH COMMITTEE.***(Committee 3)***Composition:** COO/ Direction Global Safety and Business Unit Managers / OHS Managers / Business Unit Medical Services Managers**Liaison with Committee 4:** COO**Matters:** Establishment of Global Health Calendar for unified campaigns.

Review of specific calendars.

Pooling of ALEATICA medical services regulations, sharing of ethical and medical praxis manuals and occupational medicine.

Frequency: Trimestral**GLOBAL SAFETY ALEATICA COMMITTEE***(Committee 4)***Composition:** COO/ Global Safety Management and Responsible/Managers/ Safety Business Units**Liaison with Committee 3:** COO**Matters:** Problems of Safety in Companies are shared.

Achievement of objectives and planning.
Follow-up of accident statistics.

Topics related to Road Safety.

Establishment of common guidelines for all companies in *Safety*.

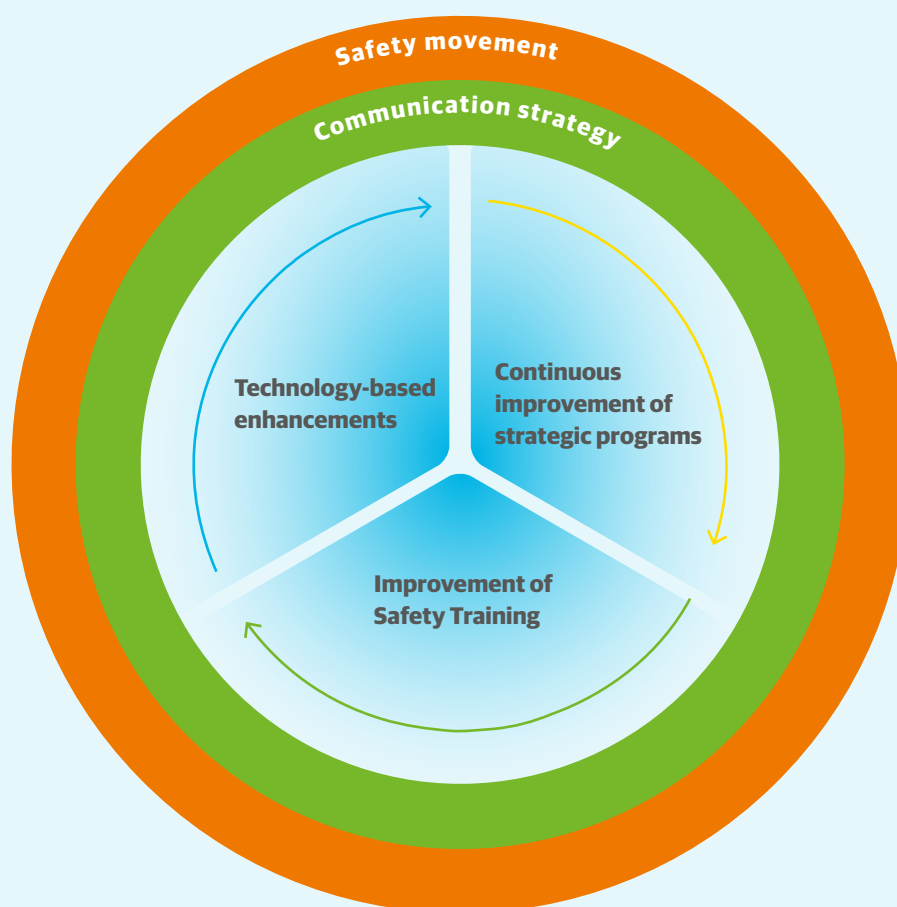
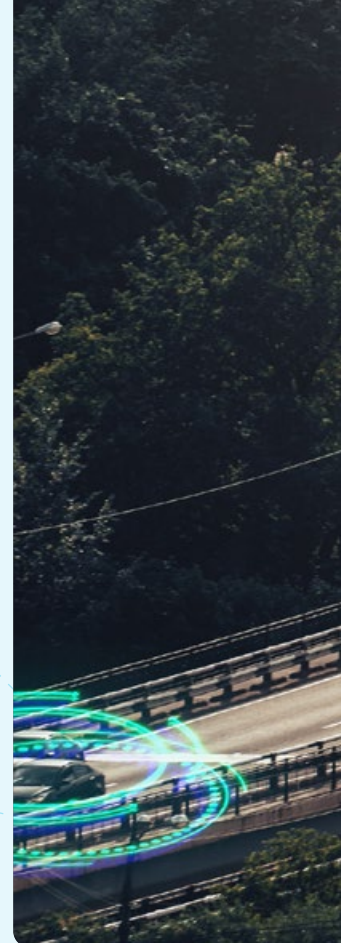
Frequency: Trimestral

As a result of the health emergency, an **Extraordinary Health Committee** was formed to analyze and establish the most appropriate strategies in the fight against COVID-19. It remained active during 2021, on a weekly basis.

In 2021, the **Global Safety Committee** was formed, where, globally with all the Business Units, issues of Occupational Risk Prevention were addressed. This committee operated during 2021 on a quarterly basis and will continue to operate in 2022.

Commitments and future goals

For the following years, there is a firm conviction to reach interdependent status as soon as possible, which makes it necessary to review and update **ALEATICA's SAFETY-FIRST PLAN** on an ongoing basis. Feedback received from external audits, collaboration initiatives and own experience help to identify ALEATICA's next challenges in all Business Units.





Our objectives for the future are:

- **Continuous improvement of strategic programs.**
 - Employees: **Job Hazard Assessment & Near Miss, Safety Stop Cards.**
 - Contractors: **Mandatory Safety Requirements (MSR)**, Contractor software and semi-annual contractor meetings.
 - Communities and Government Agencies: **#Weareallroadsafety Campaigns**
 - First responders: securing agreements/coordination with them.
 - **Safety Management System:** incorporation of **ARUP** and DSS recommendations and improvement of emergency plans.
 - **Zero Tolerance Policy¹⁹.**
- **Technology-based improvements**
 - Alarm system for forays into confined areas; hands-free systems in operating vehicles; GPS monitoring and the use of ALEATICA's Facial & Driver's License Recognition.
- **Improvements in training/education processes**
 - Adapting materials: ensuring knowledge in Safety; Learning Management System (closing the Cycle of training in the **SMS**).
- **Communication strategy**
 - Operational Dashboard & Cartoons/video and other visuals.
- **Movement towards interdependence (new programs)**
 - Safety Questionnaires; Safety Focus Groups; Safety Mentors; Safety Leadership Groups; Safety Accountability Committee; Safety Tours; Safety Awards and Recognitions.

PASSION FOR THE TEAM

We connect our people's talents **with growth opportunities**

2,000
EMPLOYEES



02

46,942.82
TRAINING
HOURS



Our people, with their commitment, passion and vision, make it possible to achieve the results and the mission we set out as a company. We recognize their effort, commitment and collaboration. We enjoy life, both inside and outside the company.

PASSION FOR THE TEAM

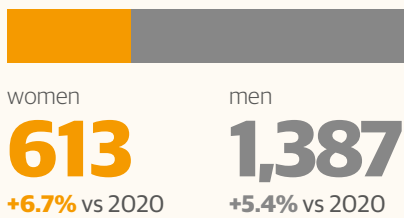
GRI: 102-8, 102-35, 102-41, 103-2, 202-1, 401-1, 401-2, 401-3, 402-1, 403-9, 404-1, 405-1, 405-2

Data

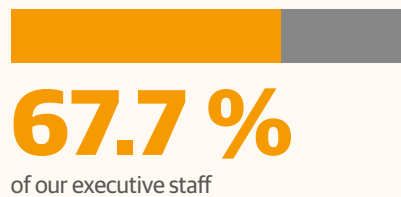
GRI: 102-7



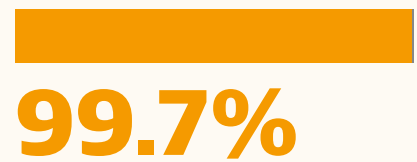
NUMBER OF EMPLOYEES



EXECUTIVES WITH LOCAL NATIONALITIES



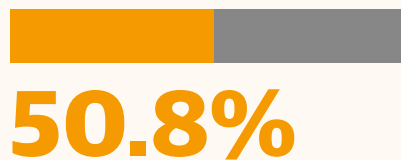
FULL-TIME EMPLOYEES



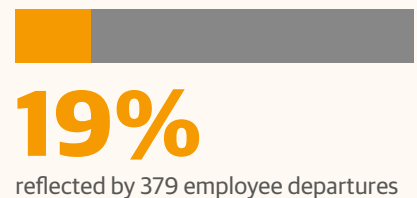
FEMALE EXECUTIVES



EMPLOYEES IN COLLECTIVE BARGAINING AGREEMENTS



PERSONNEL TURNOVER





ABSENTEEISM RATE



0.65 %

which corresponds to 34,264 hours of absence per year

PARENTAL LEAVE

26 employees took parental leave

TRAINING HOURS

46,942.82

Introduction

Our employees are a key factor in the sustainability of our business. Their development, performance and motivation are essential elements for generating satisfaction for our customers and the achievement of our objectives. For this reason, we take care of them, we recognize them, and we have clear and transparent processes that provide them with security and stability.

Based on our **Human Resources and Human Rights Policies**, we seek to create a work environment that promotes respect for human rights, inclusion, diversity and collaborative work.

All organizational leaders and Human Resources teams are responsible for disseminating these principles and promoting compliance with them.

Main achievements

- We innovated our work culture through the **Reimagine ALEATICA** plan, which involves a hybrid model for administrative employees (two days a week in the office and two days from home with flexible Friday).
- New modern, flexible, collaborative and efficient workspaces that reflect ALEATICA pillars and culture.
- Comprehensive training with the **New way of working training** program to develop new skills and work habits to work from home, improve work-life balance and leadership skills, and accompany staff through the COVID-19 pandemic.
- We conducted for the first time the **Engaged Performance** organizational culture and climate survey, conducted by Korn Ferry, which helped us identify strengths and areas for improvement to keep our workforce engaged and empowered for sustainable productivity with wellness.
- We created the Human Resources Shared Services Center (Centro de Servicios Compartidos de Recursos Humanos, CSC-RH), whose objective was to centralize the transactional processes of payroll and personnel administration in Mexico. In addition, from the CSC-RH we offer assistance to our employees in matters related to benefits and rewards.
- We created a new interaction channel through WhatsApp, where we receive and solve needs for information, guidance or documentation related to employees' rights and benefits.
- We achieved 89% employee satisfaction in terms of the quality and attention of the services offered by the Human Resources area.
- We maintained a strict protocol to manage the pandemic and mitigate the risk of contagion among our employees.



Talent Management

GRI: 102-8

At ALEATICA, we are focused on having the best talent available in terms of competencies, values and attitudes that are aligned with the company's purpose and culture. This implies improving our talent integration and retention processes, our career development, work climate and culture management, collective bargaining, among other actions that allow our company to be the greatest place to work.

As of December 31, 2021, we have a total of 2,000 employees.

DISTRIBUTION BY GENDER



MEN

1,387



WOMEN

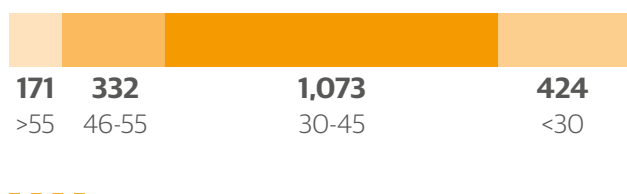
613



At ALEATICA we are committed to incorporate the best talent, regardless of gender and age. Our selection process guarantees equal opportunities and non-discrimination based on gender, race, sexual orientation, religious beliefs, political opinion, nationality, social origin, functional diversity or any other circumstance.

The distribution by age range is as follows:

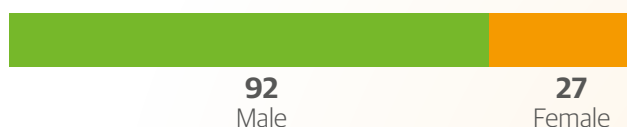
AGE RANGE



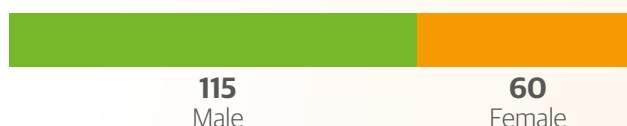
According to the roles and responsibilities, the jobs are distributed in three professional groups (Executive, Administrative and Middle Management levels), thus allowing an adequate management system and clarity in the functions to be performed by our employees. The distribution by gender is as follows:

PROFESSIONAL GROUPS

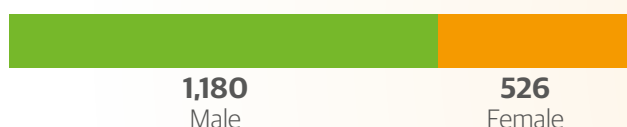
EXECUTIVES



MIDDLE MANAGEMENT



ADMINISTRATIVE/ OPERATIONAL



We seek to be an inclusive company, where diversity and multiculturality are promoted. The distribution by nationality is as follows:

EMPLOYEES' NATIONALITY

Brazilian

0.10%

Colombian

0.10%

Spanish

0.50%

Mexican

99.25%

Peruvian

0.05%

Of the total number of our employees in Mexico, 99.7% have permanent employment contracts

To promote the balance of the workforce, we have two types of working hours: full and part-time.

Of the total number of employees in ALEATICA, only 56 people have opted for part-time employment contracts according to their personal needs (maternity, care of a dependent, among others) or the requirements of the position they hold.

The rest of the employees have a temporary contract due to the nature of the service required, or because the employees are undergoing training.

Out of
2,000
employees,

99.7%
work full time

	TYPE OF CONTRACT			TYPE OF SHIFT		
	PERMANENT	PARTIAL	% PERMANENT	FULL	PARTIAL	% FULL
JOB CATEGORY						
Executives	117	2	98.3%	118	1	99.1%
Middle Management	174	1	99.4%	174	1	99.4%
Administrative/Operational	1,703	3	99.8%	1521	185	89.5%
AGE RANGE						
<30	423	1	99.7%	347	77	94.6%
30-45	1,070	3	99.7%	989	84	98.0%
46-55	331	1	99.1%	312	20	99.0%
>55	170	1	99.4%	165	6	99.5%
GENDER						
Men	1,384	3	99.7%	1,248	139	89.9%
Women	610	3	99.5%	565	48	92.1%

Collective Bargaining Agreements

GRI: 102-41

At ALEATICA, we have adopted processes and practices to ensure respect and protection of human rights, the right to free association and the eradication of forced and/or compulsory and child labor. We are committed to not interfere in the free and voluntary affiliation of our workers to legal trade union organizations nor adopt discriminatory measures for this reason.

The working conditions of 1,017 employees, representing 50.8% of the workforce, are regulated by collective bargaining agreements or collective bargaining contracts.



Employee Recruitment

GRI: 401-1

During 2021, we promoted inclusive processes to increase the integration and development of female talent. As a result of this process, we achieved a 6.7% increase of women in our workforce, compared to 2020. All our hiring processes ensure equal treatment, complying with anti-discrimination legislation in each country, supporting the promotion of diversity in the workforce and progress towards a more inclusive society and stronger business performance.

During 2021 of the 370 new hires we made, 35% were women. The following table shows hires by gender and age range.

CONTRATACIONES POR GÉNERO



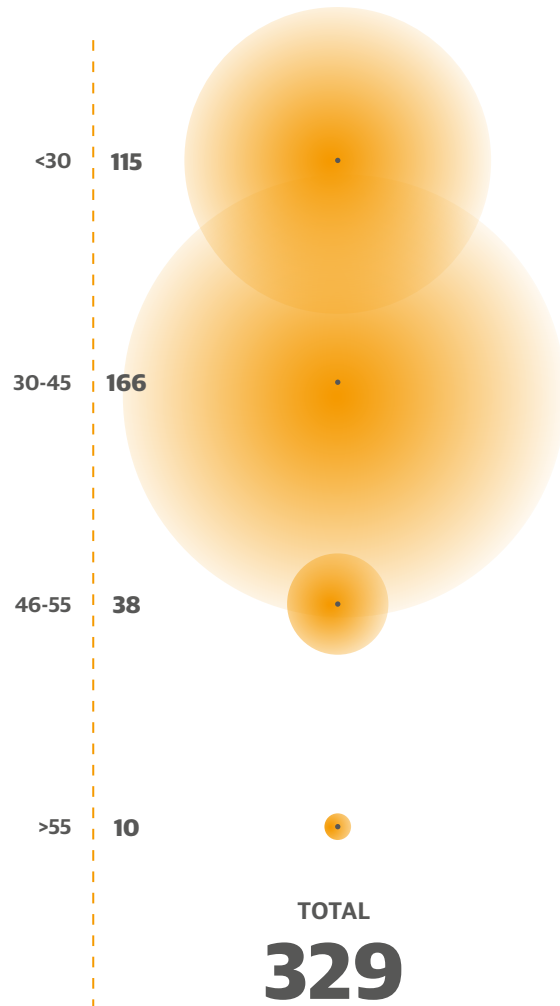
MEN

65%


WOMEN

35%

AGE RANGE



We have committed to achieve that our employees develop and grow in our company; therefore, we seek to further internal career growth in the different units in Mexico. At the end of 2021, the percentage of vacancies filled by internal talent was as follows:

PERCENTAGE OF HIRES WITH INTERNAL TALENT

2020	2021
21%	14%

Staff absenteeism and departures

GRI: 401-1

As of December 31, 2021, the absenteeism rate²⁰ was 0.65%, which corresponds to **34,264 hours**.

The distribution of **absenteeism by business unit** is as follows:

MÉXICO	Hours worked per year	Absence hours	% Absenteeism
	5,292,984	34,264	0.65%

SECONMEX

Hours worked per year

375,472

Absence hours

8

% Absenteeism

0.00%

AuNorte

Hours worked per year

352,576

Absence hours

1,432

% Absenteeism

0.40%

AT-AT

Hours worked per year

60,312

Absence hours

-

% Absenteeism

0.00%

VB

Hours worked per year

433,128

Absence hours

3,856

% Absenteeism

0.89%

GAN A

Hours worked per year

639,296

Absence hours

4,168

% Absenteeism

0.65%

CONMEX

Hours worked per year

2,525,496

Absence hours

19,520

% Absenteeism

0.77%

TELEVIA

Hours worked per year

172,232

Absence hours

664

% Absenteeism

0.38%

SUPERVIA PTE.

Hours worked per year

479,688

Absence hours

2,792

% Absenteeism

0.58%

LEP

Hours worked per year

244,800

Absence hours

1,824

% Absenteeism

0.74%

DISTRIBUTION OF ABSENTEEISM BY GENDER



DEPARTURES OF PERSONNEL



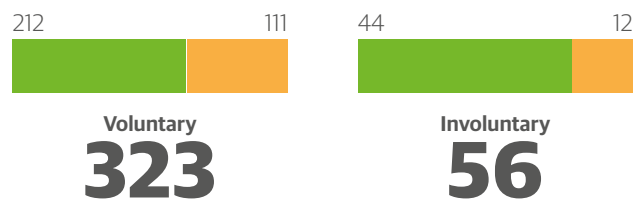
MEN

256
67.5%


WOMEN

123
32.5%

TYPE OF DEPARTURE

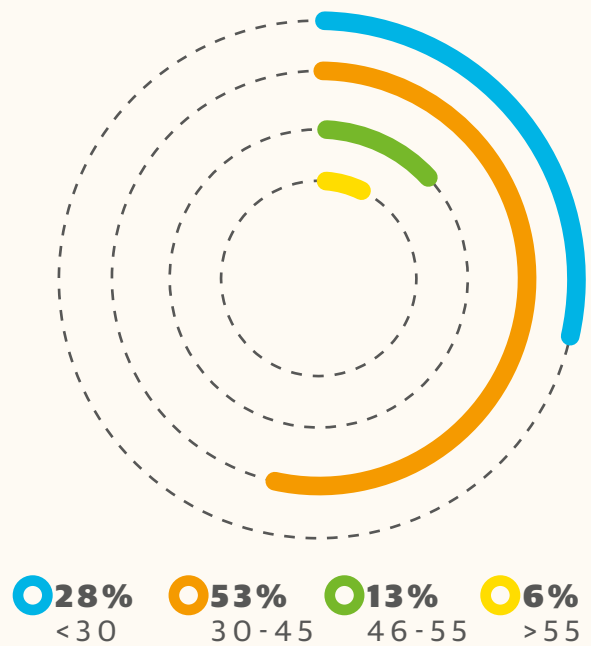

 Voluntary
323

 Involuntary
56

In 2021, there were 379 departures of personnel, showing a turnover of 19% at Mexico level

In terms of departures, **53% corresponded to personnel between 30 and 45 years of age**, which is consistent with the age group to which most of our employees belong, and with an operational profile that tends to have a higher turnover than the rest of the activities

TURNOVER



Our commitment to the professional development of our employees has resulted in a low level of turnover at the executive and middle management levels. Operational positions, as in other industries, tend to have a higher turnover.

JOB CATEGORY TURNOVER

EXECUTIVES



MIDDLE MANAGEMENT



ADMINISTRATIVE/ OPERATIONAL



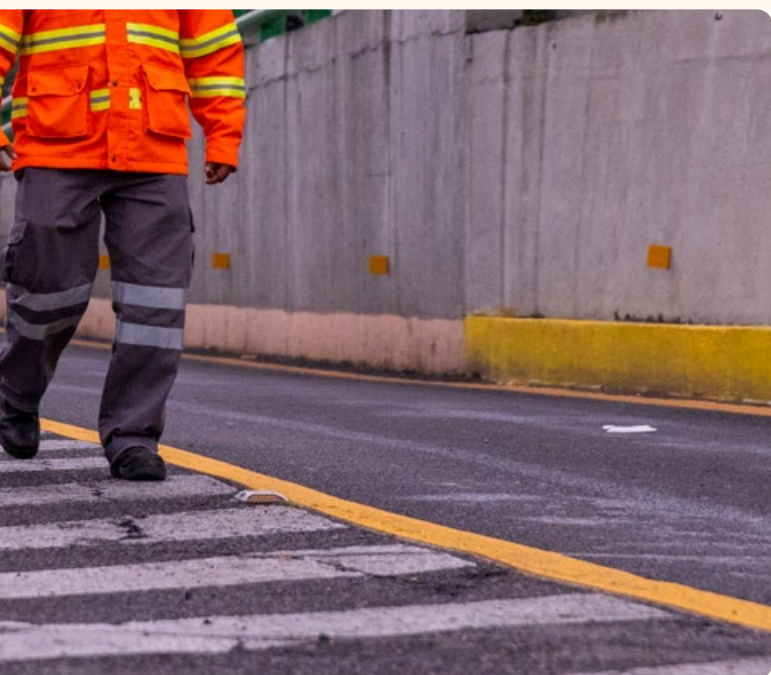
When the employee's work relationship is terminated for reasons attributable to the organization, a career transition support service (outplacement) is offered.

Talent Management Platform

At ALEATICA, we have comprehensive and innovative talent management tools that allow us to promote and measure productivity, manage performance, know the aspirations and professional interests of the employees, as well as facilitate the development of skills that contribute to professional growth within the company. Likewise, this platform makes it easier for employees to manage their information and use their benefits and rewards, thus improving their work experience.

ALEATICA GO

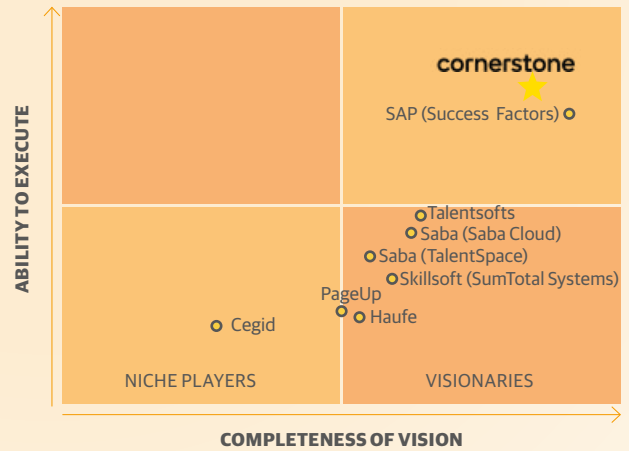
At ALETICA, we have focused on the digitalization of HR processes and since 2020 we started the implementation of the Cornerstone system that we internally call "ALEATICA Go!". Cornerstone is a Talent Management System recognized as one of the best in the market worldwide.





Leader in Talent Management

- Innovation in cloud software since 1999
- One data base
- One software: talent management, recruitment, training, development and retain talent
- Top 100 software companies in 2020



HR Tech Award
Won for skills graph



Brandon Hall Group
Won for CSOD foundation



ROI Awards-Customer Learning and Performance
Won for coustomer US xpress for learning



HUMAN RESOURCES SHARED SERVICES CENTER (CSC-RH)

The implementation of ALEATICAGo (Cornerstone) has brought several benefits in 2021, among which the following stand out:

- Digitization and standardization of all our employees' information.
- Automation of human capital administration and operation processes (compensation, work certificates, vacation processes, etc.).
- Execution of labor welfare plans.
- Management of past performance and future growth potential to prepare development plans and the possibility of filling other positions within the organization.

At ALEATICA we are aware of the importance of having a close and transparent relationship with our employees. For this reason, this year we restructured the processes and procedures of the Human Resources area, which resulted in the creation of the **Human Resources Shared Services Center (CSC-RH)**, whose objective is to centralize the transactional processes of payroll and personnel administration, as well as the attention to our employees in matters related to benefits and rewards.

To make it easier for Mexico's operational personnel to access the services we provide, we created a new interaction channel through WhatsApp, where we receive and resolve information, orientation or documentation needs related to the rights and benefits of our employees.



Performance evaluation

GRI: 404-3

Performance management is a key process to keep a team committed and aligned with the company's Pillars and business plan, driving continuous improvement and team development. In 2020 we launched the first performance management process through the establishment of annual cycles, composed of three phases:

- Goal setting.
- Mid-year review.
- Closing cycle review.

Since implementing a performance culture is a process that requires an understanding of a results-oriented vision, we decided that the performance management process would be rolled out in phases. The initial audience for performance assessments was the executive group, which by the end of 2021 reached 135 employees leading work teams and key functions in the organization.

In 2022, it will reach the middle management and professional group, with which we will address 260 more employees. The performance management process is developed through the ALEATICA GO platform.

The performance objectives are integrated by shared business and individual goals, as well as competency goals that allow us to evaluate the management of our employees from an integral perspective, which considers "What" and "How" we achieve results.

In essence, the performance assessment will allow us to:



Strengthen the performance management culture and focus on productivity.



An engaged team that performs effectively in alignment with organizational objectives.



Developing purpose and understanding individual contribution.



Having input for salary reviews and talent development processes.



Promote and encourage autonomy, empowerment and a culture of self-management.



Differentiate core tasks from value contributions.

Training and development

GRI: 404-1, 404-2

We believe in the value of human capital, which is why we offer our employees different integral development tools to improve their technical and personal skills, their well-being and safety, as well as to guarantee compliance with our values and principles.

Investment in training and development of our human capital during 2021 was largely focused on institutional training to promote organizational culture, excellence, quality, productivity and ALEATICA's competencies for business development. We also focused our training efforts on health, safety and wellness for employees and their families in order to respond to the demands of the COVID-19 pandemic and the implementation of our new hybrid work model.

In 2021, the company **invested 5.4 million pesos** in training and development programs.

46,942 total training hours



The distribution of training hours by labor category was as follows:

EXECUTIVES

1,533 h

MIDDLE MANAGEMENT

4,335 h

ADMINISTRATIVE /
OPERATIONAL

41,074 h

Due to the nature of our business and the large number of employees at the administrative and operational levels, our training processes are mainly focused on this labor category.

Our training distribution by gender was as follows:



MALE

36,736



FEMALE

10,206



During 2021, we developed a formal training program for all administrative employees named **"New way of working"**, focused on three key aspects:

1

Key competencies for productivity: Focused on developing a new set of organizational competencies, providing practical tools to ensure employee development in key behaviors that generate business value to drive sustainable results, maintaining team engagement and commitment.

2

Skills for home office: Enabling employees in the regulatory framework of hybrid work and new rules of virtual interaction. Basic fundamentals for digital change and home office skills to develop a new work environment, with new technological tools and schemes.

3

Work-Life Balance: Wellness guidelines to promote a healthy lifestyle and a culture focused on work-life balance, aimed at caring for our employees' physical and emotional health.

Other topics we offered in 2021 in training processes were as follows:

- Technical skills required for the position.
- Equity, ethics and values: code of ethics, conflict of interest, anti-corruption and gender equity.
- Skills: Self-awareness and personal development, train the trainer, individual skills in team building, managerial and positive leadership, motivation, organizational cooperation, decision making and languages.
- Occupational health and safety: Bomb threat, occupational health and safety principles, hot work and confined spaces, civil protection.
- Technicians and specialists: driving assessments, use and maintenance of articulated cranes.
- Technology and cybercrime.

Compensation

GRI: 102-35, 102-36, 202-1, 405-1, 405-2

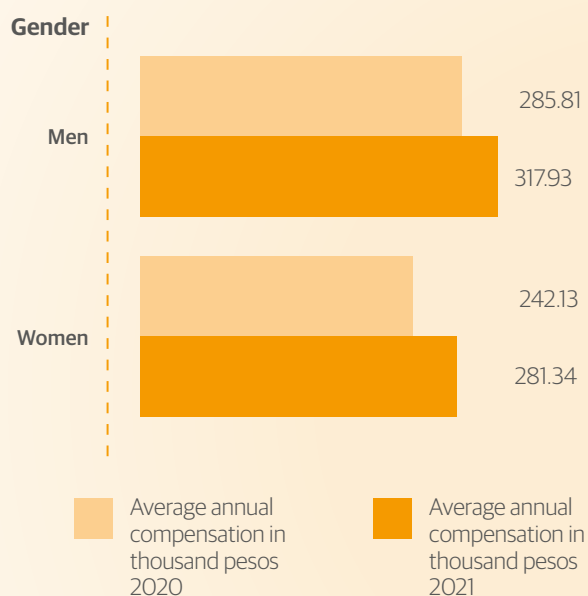
We seek to compensate our employees based on a competitive and equitable compensation and benefits system that goes beyond the average of the market in which we operate.

In order to ensure competitiveness in the market, we conduct an annual Employee Compensation Review Process, which aims to identify the gaps that should be closed in order to position each person's compensation at least at 80% of the market average.

All employees are paid above the minimum wage and, depending on their responsibilities, they can earn additional bonuses based on their productivity. Given our executives contribute significantly to the achievement of company's medium and long-term goals, they are invited to join a long-term incentive program, which has the purpose of aligning performance with the shareholders' vision and retaining critical capacities to face the present and future business challenges.

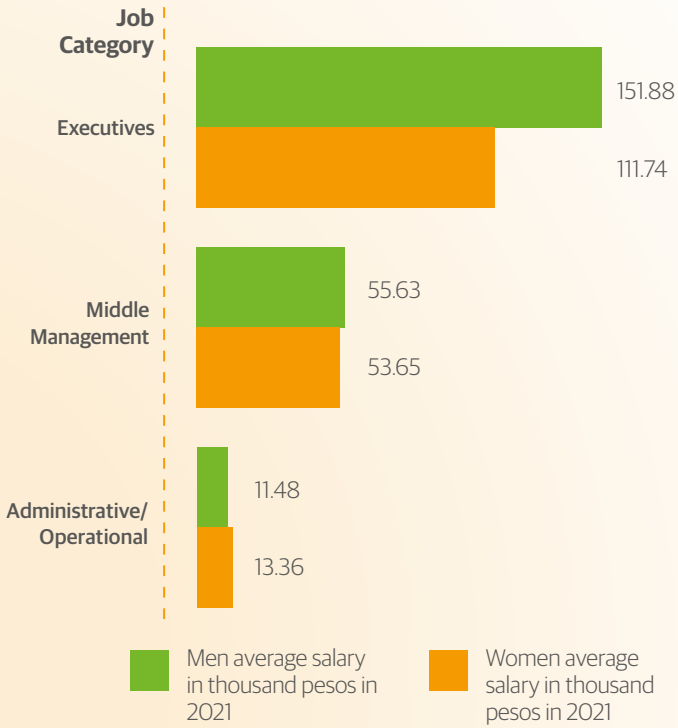
Our compensation takes experience into account, which is consistent with average annual salaries by age group. We always operate in compliance with labor laws regarding salaries, work schedules, working hours, overtime and labor benefits.

We are committed to the development of women and seek to promote their growth in the organization in positions of greater responsibility, to take advantage of the perspectives of female talent and reduce gender gaps. At ALEATICA, compensation is assigned by level of responsibility, and we do not discriminate by gender.²¹



In 2021, 18 executives took part in the **long-term incentive program**





Regarding the salary ratio defined as the average base salary of women in relation to the average base salary of men, figures are as follows:

EXECUTIVES
34.99%

MIDDLE MANAGEMENT
3.46%

ADMINISTRATIVE & OPERATIONAL
-13.81%



Benefits and working conditions

GRI: 103-2, 401-2, 402-1

Our Passion for the Team pillar is based on guaranteeing working conditions that allow our employees to balance their family and work life and that their professional performance does not conflict with their physical and emotional well-being.

In Mexico, we have a series of benefits and initiatives linked to personal and work well-being, such as:



Life insurance



Major medical insurance at middle management and executive levels



Disability or medical leave coverage



Parental leave



Grocery coupons



Savings fund



Paid personal days to address personal situations at middle management and executive levels



Institutional medical consultation



Seasonal preventive vaccination



Discount agreements for the use of services or acquisition of goods.

For the final management of our employees' professional careers, in Mexico we continue to have a retirement pension plan. We have improved the benefits of the savings account, increasing the maximum monthly savings limit, granting loans with longer terms and providing financial education at all times. All employees are enrolled in the social security system of the corresponding country.

Reimagine ALEATICA

In 2021, we continued our commitment to protect our employees primarily, ensuring the safety of our customers, and demonstrating our commitment to the well-being of the communities in which we operate.

Reimagine ALEATICA allowed us to have a hybrid work scheme where our administrative employees can work two days a week from home, two days in person at our offices and on Fridays in a flexible scheme.

TOREO OFFICES



Our MY ALEATICA application allows them to plan their work schedules according to the operational needs of the teams and the availability of space in our facilities. It will also provide employees with access to reserve work and parking spaces if they wish to access the company's facilities on days when they are not scheduled to do so.

In an effort to improve the quality of life of the employees and the coordination between internal and global work teams, since 2021 the **Work Modalities Standard** has been implemented, which establishes guidelines for:



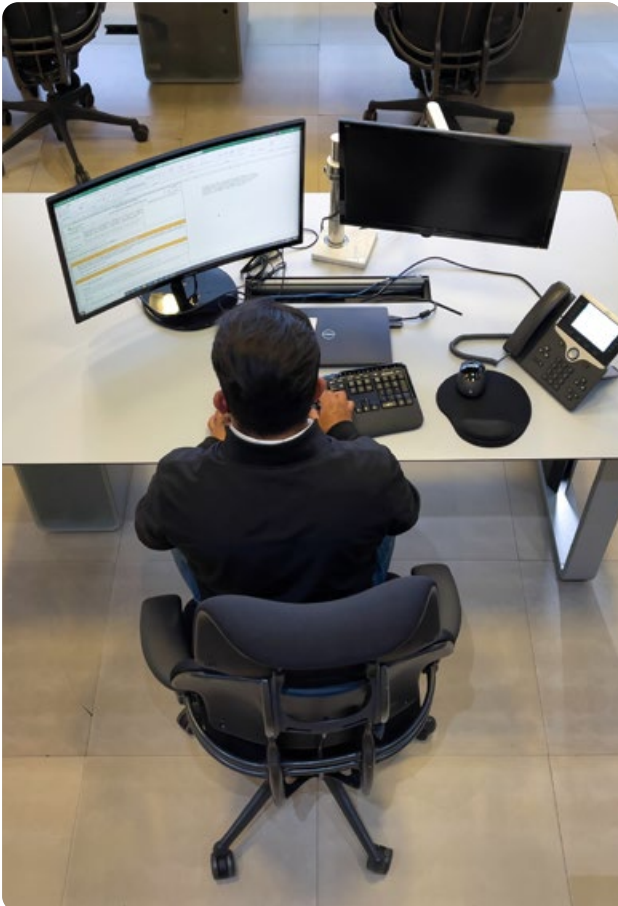
Work schedules that maximize the window for interaction between countries.



Rules for scheduling meetings, calls and sending emails.



Establishing rest and disconnection times to promote greater productivity and improve employees' quality of life.



This set of guidelines and new rules of interaction aims to ensure a sustainable and productive way of working paired with well-being for ALEATICA's employees.

All Business Units have staggered or flexible start and end times. Working hours are developed in accordance with the nature of the activities of each job, always respecting the laws, contracts or collective and individual agreements.

Employee Well-Being

GRI: 403-1, 403-2, 403-3, 403-6, 403-7

In 2021, we continued our commitment to protect our employees primarily, ensuring the safety of our customers, and demonstrating our commitment to the well-being of the communities in which we operate.

Our Health Alert Committee continues informing and training our personnel on how COVID-19 behaves, contagion, local and global vaccination and prevention measures, as well as the discoveries made by the world medical community.

Among the benefits we provide to safeguard our employees' wellbeing and health in the post-pandemic period are:

- Implementing the hybrid and staggered work of our administrative employees through Reimagine ALEATICA.
- Following up on our Integral Wellness program, aimed at our employees and their families, in which we provide support in four axes: Emotional Support, Development of Remote Work Skills, Life Balance and Financial Health.
- Identifying vulnerable operational employees or positive cases and place them in total confinement at home with 100% pay.
- Implementing the COVID-19 Tracker tool to identify possible cases of contagion, positive cases, immunizations, hospitalizations and deaths by country and by Business Unit.
- Conducting communication campaigns and trainings to prevent stigmatization of recovered COVID-19 personnel.
- Providing timely medical follow-up in positive, suspected and vulnerable cases by the Medical Team and Human Resources.
- Providing training focused on the prevention of contagion risks.

During the year 2022, we will continue to apply infection prevention and control protocols, as well as measures to protect the physical, mental and emotional health of our team

Engaged Performance

On the other hand, as part of the evolution of our organizational culture, in 2021 we carried out for the first time the Engaged Performance diagnosis, an organizational culture and climate survey that allows us to evaluate the commitment and satisfaction of our employees towards the organization.

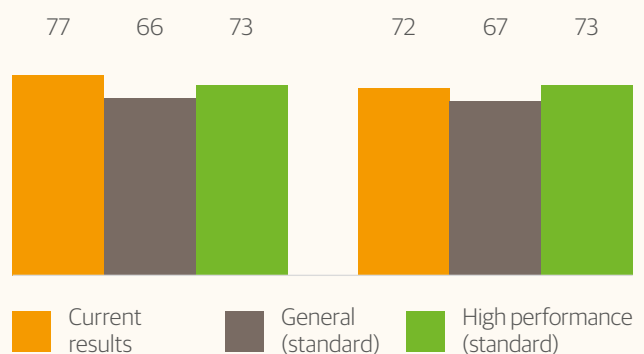
Based on the results of the survey, strengths and improvement areas were identified to keep our workforce engaged and empowered for sustainable productivity. In addition, action plans were established to improve the gaps obtained in each area of the organization.

PARTICIPATION

















COMMITMENT AND ORGANIZATIONAL SUPPORT

% Commitment % Organizational Support



EFFECTIVENESS MATRIX



	% Favorable	% Neutral	% Unfavorable	Distribution	General (standard)	High performance (standard)
Commitment	77	15	9		11*	4*
Organizational support	72	17	11		5*	-1
Authority and empowerment	61	24	15		-1	-9*
Directive Clarity	84	12	4		10*	2*
Partnership	65	22	14		8*	0
Confidence in Management	79	13	8		11*	3*
Development opportunities	65	20	15		6*	-1
Compensation and benefits	61	21	18		7*	-1
Performance management	70	18	12		5*	-2*
Customer orientation	80	14	6		4*	-4*
Resources	72	14	14		3*	-3*
Respect and recognition	72	16	12		1	-5*
Training	67	19	15		8*	1
Work, structure and processes	68	20	13		11*	2*

Reconciliation of work and family life

GRI: 401-3

At ALEATICA, we guarantee the right of exercising parental leave to each employee. In 2021, 26 employees exercised this right.

PARENTAL LEAVE



MEN

9



WOMEN

17

Of the 29 employees who took parental leave in 2020, 79% **(23 employees)** continue to work in the company



Equity, Diversity and Inclusion

GRI: 405-1,202-2

For ALEATICA, diversity and inclusion in all its forms is fundamental to a sustainable business development model. We are committed to this premise and translate it into initiatives aimed at promoting the presence of women at all levels and improving working conditions that guarantee the right of all employees regardless of gender, age, race or any other social or physical condition.

Our **Human Resources Policy** provides for the implementation of various actions in the area of gender equality, in the processes of hiring, internal promotion, training, health of work and family life, improvements in working conditions, accessibility and internal communication channels that guarantee the right of employees to be informed, to submit queries, criticisms, complaints and denunciations.

The **Gender Equality Policy** in force at the end of the year is based on the following guiding principles and behavior guidelines:

- Equal treatment for men and women.
- Ensuring that there is no direct or indirect discrimination based on gender.
- Prohibition of moral harassment.
- Zero tolerance to sexual harassment.
- Principle of indemnity against retaliation.

At the end of 2021,

31%

of our workforce was made up of women, **6.7%** more than at the end of 2020

Of our **119** executives,

90%

are Mexican local employees.

The number of women in executive positions is 27

In addition, as part of these measures, the following webinars have been held:

1. Equality begins with us.
2. Caregiving is a team effort.
3. Inclusion in times of crisis.
4. Diversity is different from inclusion.

We work to ensure mutual respect and a comfortable, healthy and safe working environment for everyone. Our Code of Ethics prohibits any type of discrimination and any type of harassment, abuse of authority, threats, pressure, moral harassment, offense or any other form of aggressiveness and hostility that creates a climate of intimidation. To this end, channels and mechanisms have been established so that any situation that goes against our values, regulations and principles can be reported.



Accessibility

We want to strengthen the company's role as a social actor committed to functional diversity by ensuring that our workspaces, communication with our customers and the information offered to the general public are accessible.

During 2021, ALEATICA reaffirmed its commitment to functional diversity by making our workspaces in Mexico accessible within Business Units such as GANA and corporate offices, where we have handicap accessible ramps and specially assigned parking spaces.

To date, we employ 4 employees with some type of disability. In 2022, the effort must continue in order to create adequate spaces in the rest of the Business Units

Commitments and future goals

We have defined the following initiatives with the aim of continuing to strengthen employee engagement and empowerment by 2022 - 2025, and to continue building together a great place to work, through a culture that maximizes productivity, inclusion and well-being.

03

10 HIGHWAYS
3 PORTS



SERVICE EXCELLENCE

We connect service
excellence **with our**
customers' needs

8.8/10
SATISFACTION
SURVEY RATING



Our raison d'être is people. We serve and care for our customers. We apply a systemic and innovative approach to provide a high added value service. We are allies of our clients.

EXCELENCIA EN EL SERVICIO

GRI: 102-17

Data²²

Invoices generated through
ALEATICA App



57,331

invoices generated in
2021 vs. **6,316** in 2020

Average satisfaction survey rating



8.8/10

en 2021 vs **8.8/10** en 2020

Average daily electronic
transactions TeleVía



383,094

Introduction

For ALEATICA, our customers are the main focus of our operation and the service we provide. Therefore, we focus on meeting their requirements and fulfilling the expectations they have when using our roads and ensuring that they have a first class experience.

We seek to evolve towards a **Customer Experience (CX)**, redefining our integrated culture in all areas and the perception of our customers, understanding and meeting their internal and external needs



Continuous training and improvement of the service we provide are fundamental to our pillar, as well as the guidance of good practices and international standards on service and customer satisfaction.

We have a new perspective with a focus on providing our customers with safe, comfortable and agile journeys. Teams will acquire new skills and knowledge to become Customer Experience (CX) experts.

This year, **Transversal Customer Experience Committees** were created, whose objective is to develop, prioritize, approve and follow up on projects focused on the needs and requirements of the customers when using our services, seeking **to improve the experience**, and at the same time, the internal processes to solve high-impact complaints.

Markets Served

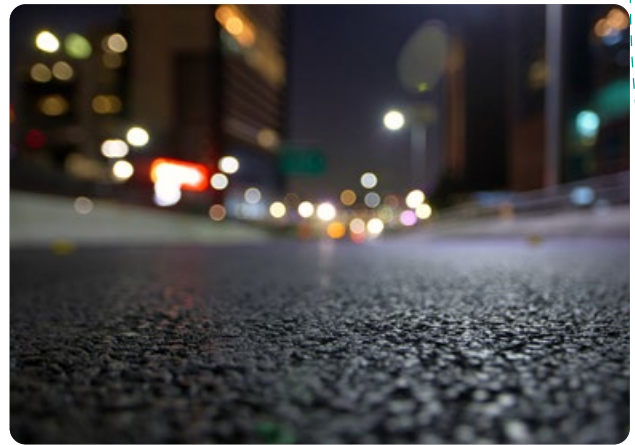
GRI 102-6

Circuito Exterior Mexiquense (CONMEX)

intersects 19 municipalities in the State of Mexico and interconnects the most densely populated areas of the Mexico City metropolitan area and several key commercial and industrial centers located in the north of Mexico City. It serves as a beltway to Mexico City and interconnects with six of Mexico City's major gateways (the Mexico-Queretaro, Mexico-Pachuca, Mexico-Puebla, Mexico-Tlaxiaco, Mexico-Tulancingo, Chamapa-Lechería and Peñón-Texcoco highways). It is also a bypass road from the north to the west of the Valley of Mexico.

The **sectors served** are mainly **motorists, transport operators and companies**, and the beneficiaries of this road are the **inhabitants of the region (from nearby municipalities, and commuters) and travelers (moving from different areas and cities of the country)**, which in turn are divided into **light vehicles, heavy vehicles (mainly business transporters) and passenger buses**.

Grupo Autopistas Nacionales (GANSA) traverses the cities of Puebla, Tlaxcala and Veracruz. The main **sectors served** are **motorists, transport operators, and companies**. The highway's customers are **light vehicles, heavy vehicles, and travelers**.



Autopista Urbana Norte (AuNorte)

traverses the Miguel Hidalgo, Álvaro Obregón and Benito Juárez municipalities, from the border with the State of Mexico to Avenida San Antonio (Mixcoac), linking to the north with the Viaducto Bicentenario (VB) towards the Querétaro highway, to the south with the Segundo Piso Libre towards the Cuernavaca highway and Supervía.



Viaducto Bicentenario (VB)

links the State of Mexico with Mexico City, crossing the municipalities of Naucalpan, Tlalnepantla and Cuautitlán Izcalli, having great influence on the suburban area of these three with Atizapán, Tultitlán, Cuautitlán and Tepetzotlán. It develops to the south from the border with Mexico City in the Miguel Hidalgo municipality, connecting with Autopista Urbana Norte (AuNorte), and to the north of the State of Mexico connecting with the Mexico-Queretaro Highway, the Circuito Exterior Mexiquense (CONMEX) and the Chamapa-Lechería Highway.



Libramiento Elevado de Puebla (LEP) is the construction of an elevated highway over México-Puebla-Veracruz MEX150 highway, where main sectors served are motorists, transport operators and companies, with a benefit to customers such as light and heavy vehicle drivers, as well as to travelers and regular users of the road.

Supervía Poniente (SVP) is an urban toll highway that links two strategic points of Mexico City: Santa Fe and Anillo Periférico, at its junction with Luis Cabrera.



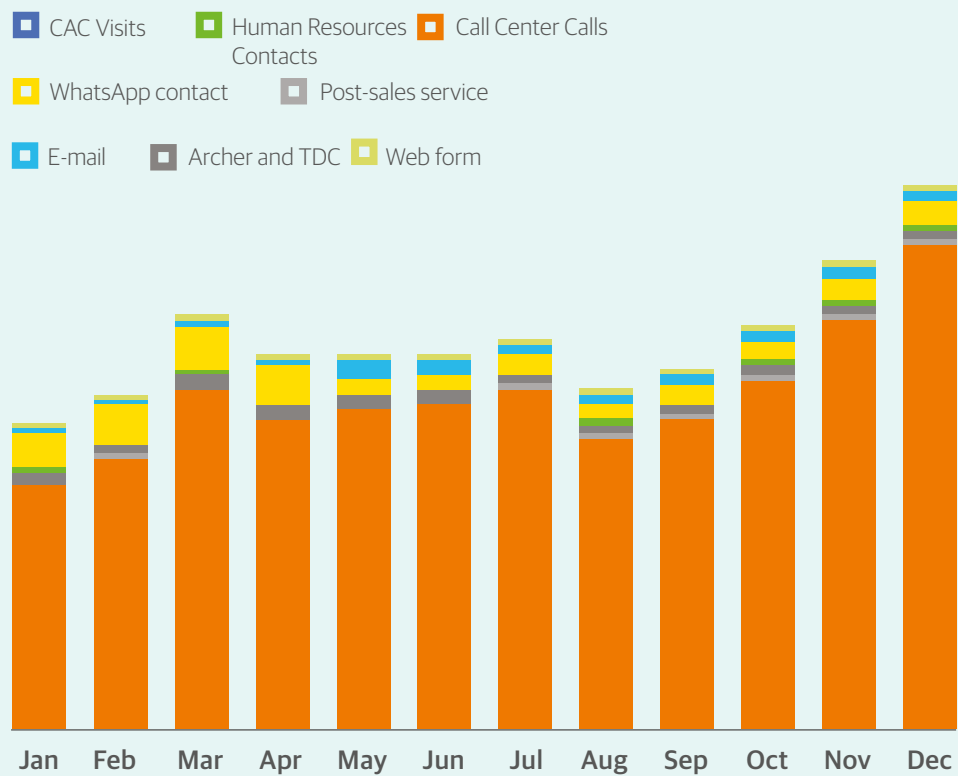


TeleVía, a company that provides payment methods on highways through an electronic toll collection system and parking lots, **is present in 31 states in the country.** The sectors served are mainly business and retail, business-to-business (B2B) and business-to-consumer (B2C) transactions.



Based on a robust multichannel transactional and customer service platform, TeleVía develops innovative solutions based on its state-of-the-art technology, offering trust, efficiency and flexibility. **It handled 139,829,455 transactions in 2021,** representing a daily average of **383,094** electronic transactions on the highways where services are provided and on those that are part of the interoperability. TeleVía tags are read on more than **3,000 lanes nationwide.**

In order to provide personalized attention, TeleVía offers customers various communication channels such as telephone assistance in a centralized Contact Center for the Business Units in Mexico, web form, email, after-sales and credit card service platform, as well as social media. During 2021, TeleVía received a monthly average of 87,373 customer contacts, of which the highest percentage (85.5%) corresponds to calls entering the Contact Center and WhastApp contacts (6.4%). Self-help tools, interactive voice response (IVR) settings and chatbots are being developed to improve the experience of our customers.



AT-AT, a Business Unit currently under construction, will connect the northwest of Mexico City with the north and west of the country, as well as the cities of Mexico, Querétaro and Guadalajara.



Main achievements

One Customer Experience Strategy

Supported by experts in service and customer experience issues and working groups with Directors, we generated a new **Customer Service strategy**, with the objective of evolving towards a **high-level Customer Experience**.

We are very proud of what we have **achieved** this year:



In all the Business Units in Mexico, we performed **maturity level evaluations** on **user experience** issues, as well as analysis of **situations and emotions** that the customers have when they use our roads in order to provide solutions that meet the best service practices and requirements of our users.



We analyzed and exploited **data generated in ALEATICA** from different sources of information and mobility data, which allow us to know the characterization and segmentation of the user profile, answering **strategic questions** about the use of highways, demographic information and traffic, to develop a commercial strategy that seeks to build loyalty among existing customers and attract new ones.



We unified our operation in a **single Contact Center** that handles calls from customers and provides information about ALEATICA services, which shares our values and the importance of offering **effective customer service**. We have collaborated with our supplier in the sensitization and training that adapts to our way of operating and manages to put into practice our culture of **prevention and priority attention to emergencies**.

Customer Service Indicators

We have **9 indicators** to measure the **attention and service provided to our customers**, through which we develop action plans to monitor results, attention to relevant situations and an intelligent analysis of the information.



COMPLAINTS AND CONTACTS

Ratio of complaints to contacts

Percentage of complaints received, given the total number of contacts

Ratio complaints - capacity

Complaints received per million vehicles/users



CUSTOMER SURVEYS

Customer Satisfaction Survey

Percentage of satisfied customers who consider that they have had a very good service

Net Promoter Score

Measures a customer's loyalty and how likely they are to recommend us after receiving a service



SERVICE LEVELS

Contact Center service level

Percentage of calls answered in less than 20 seconds

Abandonment

Percentage of abandoned calls

First Contact Resolution

Concerns resolved on first contact



BILLING AND EVENT FULFILLMENT

Billing Efficiency

Complaints received about the billing service

Event Compliance

Efficiency measured in terms of attention and resolution times

Customer Service and Customer Care Projects

Circuito Exterior Mexiquense (CONMEX)

In **CONMEX** we installed a new **mobile monitoring system** with two cameras in each service unit: one with a front view and the other with internal visibility to monitor people inside their vehicles in the event of a service request. In addition, this roadside assistance unit was equipped with an **audio recording system**.

Similarly, at **CONMEX** our objective this year was to implement the **Customer Experience Strategy (CX)**. We created Transversal Committees, which defined customer profiles (people) and journeys in order to analyze data together with the Data Working Group and begin preparing a commercial strategy



GANA

For **GANA**, one of the biggest projects in 2021 was the **installation of fiber** along the highway. This allows us to improve communication between toll booths and develop strategies to benefit the safety of customers and employees.

GANA installed **two convenience stores** at the Perote toll booth so that customers could have access to food and beverages. **Two weather stations** were installed to monitor temperature and humidity on the road, **one at the Cantona toll plaza and the other at Libramiento de Perote**. This allows **customers to be alerted about road conditions through variable message boards**.

Similarly, the "Active Teller" initiative was launched, which consists of proactively interacting with customers to make **recommendations on the use of seat belts**, respecting speed limits and road signs, as well as **not using mobile phones as an accident prevention measure**.



LEP

LEP strengthened the road safety campaign by changing the advertisements over boom barriers and collecting points and, for the summer holiday, it placed placards at each toll plaza with messages referring to safe driving.

In the last week of November 2021, **GANA** conducted a road health and safety campaign for customers at the Amozoc and Cantona toll booths. A total of **250 customers participated** in the campaign and the following tests and activities were conducted:

- Antibody tests for COVID-19
- Triglyceride rapid test
- Cholesterol rapid test
- Blood pressure
- Temperature, heart rate and oxygen saturation
- Weight and height control
- Mechanical revision of vehicles (minor revision), water levels, antifreeze, brake fluid, oil and tire pressure.
- Video presentation on road safety awareness.



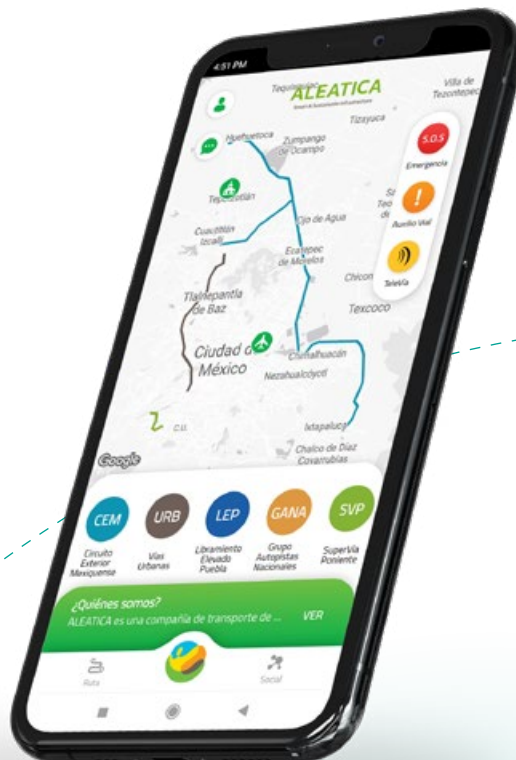
Means of Contact

Focused on providing an excellent service experience, we manage various means of contact with customers, which facilitate communication and understanding of their needs and expectations

MEANS OF CONTACT	MEXICO							
	CONMEX	GANA	AuNorte	VB	Supervía Poniente	LEP	TeleVía	ATT
Webpage	●	●	●	●	●	●	●	●
E-mail	●	●	●	●	●	●	●	
Phone numbers	●	●	●	●	●	●	●	●
Emergency/Control center	●	●	●	●	●	●		
Call center	●	●	●	●	●	●	●	
Twitter	●		●	●	●	●	●	●
Facebook	●		●	●	●	●	●	●
Youtube	●		●	●	●		●	●
WhatsApp						●	●	
App	●	●	●	●		●	●	

ALEATICA APP

Technological tools bring us closer to our customers, and with the aim of providing an innovative and safe service, this year we launched the **ALEATICA APP** for Business Units in Mexico, with a new version that includes the **implementation of a chatbot for customer service**, an option to report incidents and bill trips by scanning a **QR code printed** on their receipts. It also has other functionalities such as sending multimedia evidence of attention to customer notices (potholes, streetlights, broken vehicles, among others), maps and personalized location, voice applications and smart watches.



In 2021, the **ALEATICA APP** was downloaded **14,158 times** and **57,331** invoices were generated (57,169 in CONMEX and 162 in GANA, which started invoicing through the **APP as of November**)

We carried out awareness campaigns for the ALEATICA APP in social media and on the AuNorte and Viaducto Bicentenario (VB) roads, highlighting some of the functionalities offered by the APP.

Satisfaction surveys

Listening to and recognizing the customer's opinion about the service provided through satisfaction surveys is a fundamental part of the Service Excellence pillar.

Satisfaction surveys allow us to know the level of response that our customers have to the service provided by ALEATICA and the perception and opinion that customers have about our highways, in order to identify the main needs, they have when interacting with the company and address them in coordination with different areas of the organization.

At ALEATICA we measure customer satisfaction through monthly surveys and indicators such as the Net Promoter Score, which helps to measure customer loyalty and to know if they are willing to recommend ALEATICA to their acquaintances.

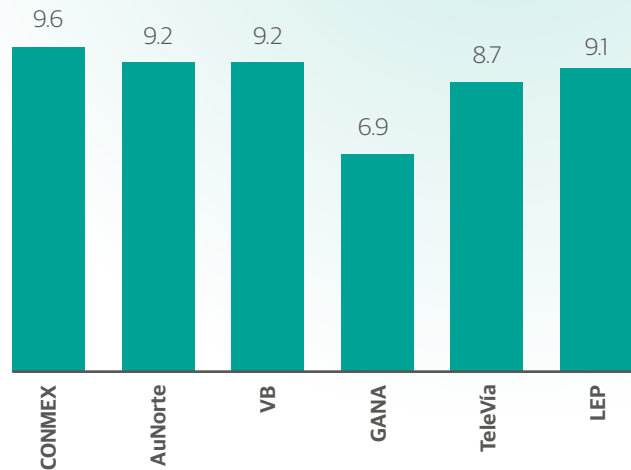
The average satisfaction survey rating in 2021 was **8.8/10**



We also seek to gather comments and opinions on an ongoing basis, through our contact channels and tools that are available to customers.

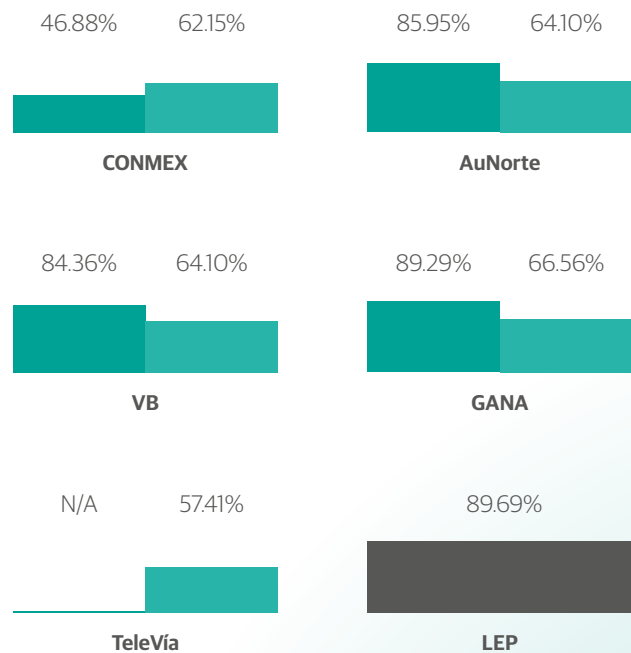
SATISFACTION SURVEYS 2021

Rating: 1 to 10



AVERAGE NPS RATING

■ Road Assistance ■ Customer Service



Complaints system

ALEATICA provides customers with different communication channels to listen and respond to their requirements and requests, as well as to ensure the correct reception of complaints.

The **Customer Service** area of each Business Unit is in charge of **handling complaints, which are addressed, registered and classified according to the reason behind the request, in order to provide a correct follow-up**. In the event that the complaint is not resolved at the first contact, the representatives will contact the customer reporting the incident via telephone or email. Finally, for ALEATICA's internal record, an effective survey is performed, collecting additional data from the customer in order to contact them further and follow up.

Complaints are submitted to the area(s) involved and **analyzed according to the situation reported**, where the responsible person(s) reviews and resolves the complaint, establishing corrective and follow-up actions, providing the area involved with the corresponding feedback. We maintain **continuous coordination with operation and maintenance areas**, as well as with contracted suppliers who, by their nature, have direct contact with customers.

We continue to conduct customer surveys, which are sent to the customer once the service has been provided by any of our means of contact.



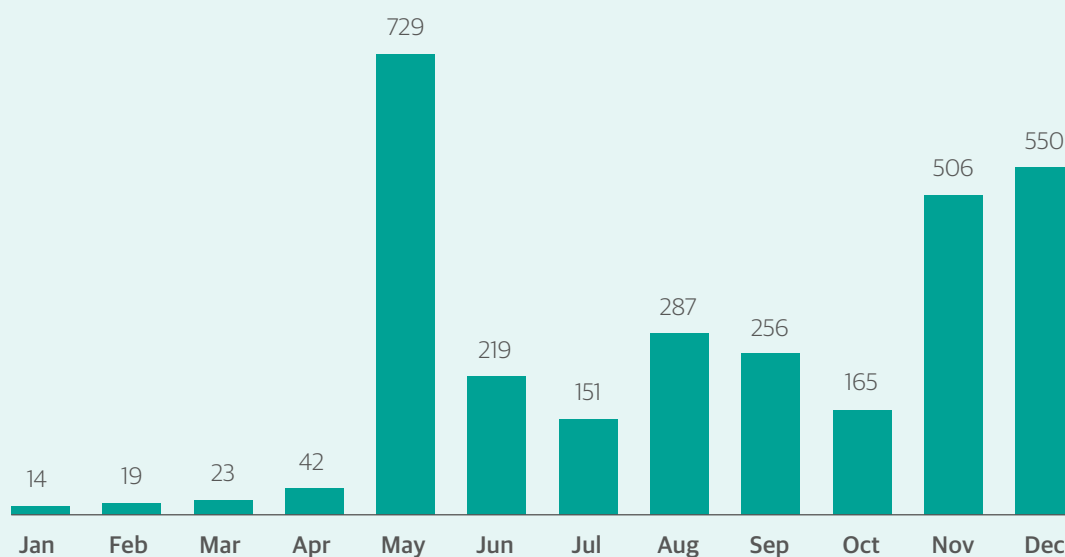
The customer is notified in writing via email regarding the ruling of admissible and inadmissible complaints, to comply with compliance deadlines

Complaints

The following are the complaints that the roads and ports had during 2021, as well as the main reasons for these complaints.

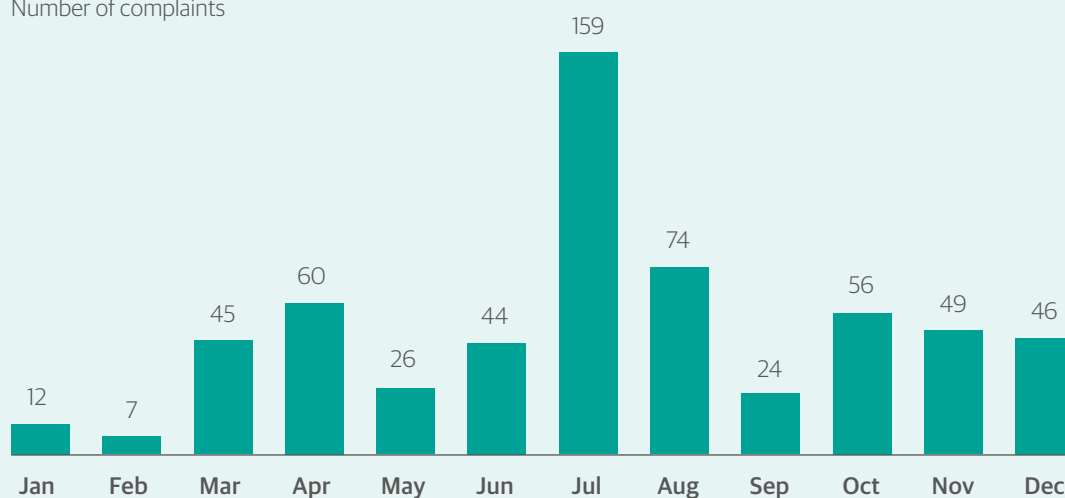
CONMEX

Number of complaints



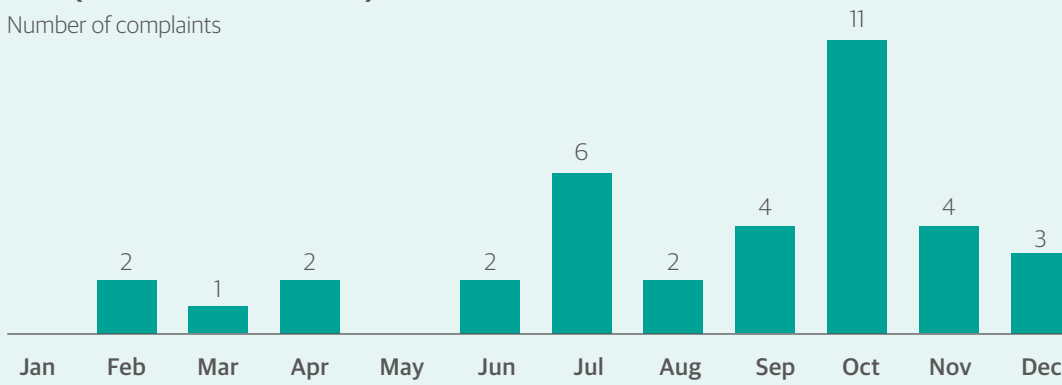
GAN A

Number of complaints

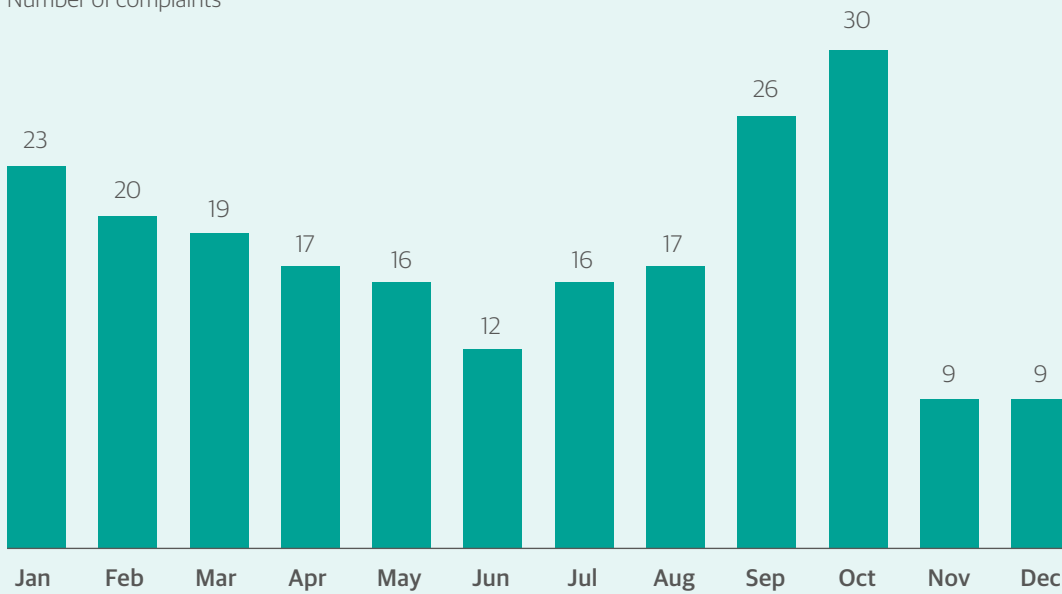


VU (AUNORTE Y VB)

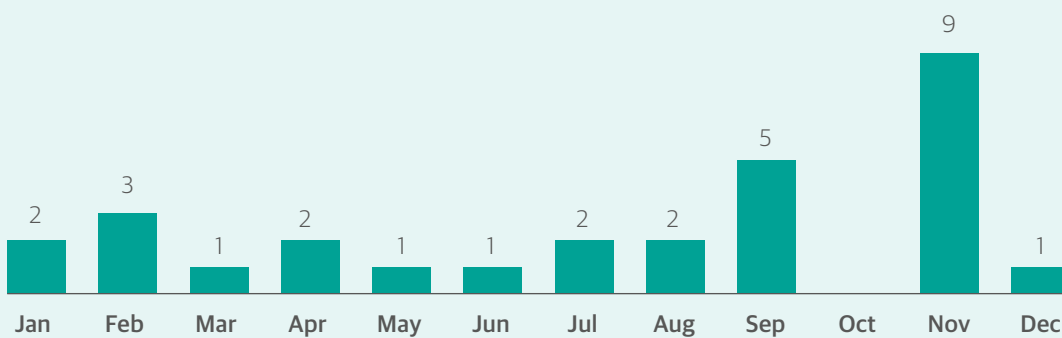
Number of complaints

**SVP**

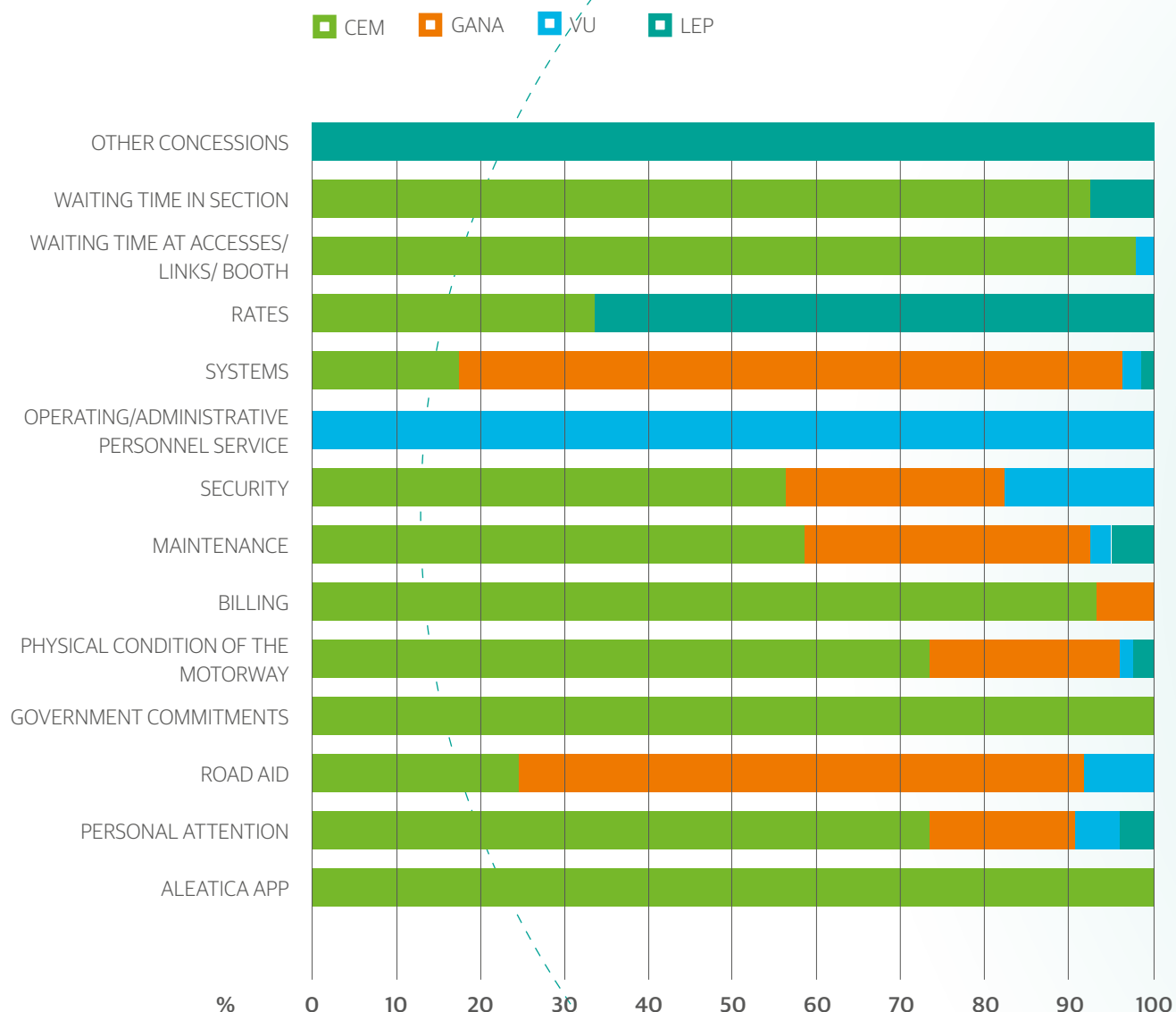
Number of complaints

**SVP**

Number of complaints



Main reasons for complaints



The most recurring issues are related to errors in the billing system or unavailable receipts. To address this issue, automatic menu configurations in interactive voice response (IVR) and improvements in the portals are being made so that the customer can bill in a better way. For the attention of personnel and service provided to customers, we continue to provide training and disseminate material on service protocols and topics, so that those in charge of the operation can provide a high level of service.



Personal Data Privacy

GRI: 418-1

ALEATICA is subject to the DAJ-NORM-04 Standard, Protection of Personal Data Standard, which is an internal corporate document. **DAJ-NORM04. Protection of Personal Data Standard**, which establishes the form and those responsible for carrying out such actions. Likewise, we have **Privacy Notices for Suppliers** (Click here to see the template of the Privacy Notice for Suppliers of Mexico: <https://www.aleatica.com/avisos-de-privacidad-global/>). When data are transferred to suppliers to have them process such data on behalf of ALEATICA's companies, **Data Processing Order Agreements** are executed. ALEATICA's corporations in Mexico have a Person Responsible for Data Protection appointed by the Company's Board of Directors; said designee usually belongs to the Legal Area. In addition, ALEATICA Group has a Global Data Protection Delegate based on Spain, with more than 10 years of experience in Privacy and Data Protection. The Persons Responsible for Data Protection Activities of all the Group's corporations report to the Global Data Protection Delegate, who in turn provides them with support. The roles and responsibilities of these positions are defined in **DAJ-NORM-04 Standard, Protection of Personal Data Standard**.



The Global Data Protection Delegate is responsible for:

- Defining annual action plans in matters of Privacy and Data Protection to be executed by ALEATICA Group's corporations and following up through one-to-one meetings and meetings of the Global Data Protection Committee.
- Reporting quarterly to ALEATICA's Audit Committee on the status of the annual action plan.
- Reporting semiannually to ALEATICA's Board on the status of implementation of the action plan.
- Performing an annual assessment of the Privacy and Data Protection Risks in the ERM (Enterprise Risk Management) frame, defining mitigation plans, following up said plans and reporting their quarterly status.

There were no complaints regarding breaches of customer privacy, theft or loss of customer data in 2021

ALEATICA has a **zero tolerance policy regarding the willful or negligent breach of the Group's corporate standards**, and those related to Privacy and Data Protection, among them, Application of disciplinary actions in these cases follows the established labor processes, with the employees' rights fully guaranteed.



DAJ-NORM-04 Standard, Protection of Personal Data Standard establishes that the ALEATICA Group's Steering Committee should approve annually an audit plan for the next year, identifying corporations, areas, data processing, agreements, and safety to cover such audits.

Currently, TeleVía follows the requirements applicable to its operation in terms of PCI DSS V.3.2.1 regulations. In 2020, the first validation audit was conducted to review compliance with the correct implementation of the regulations. This review was satisfactory, and the cybersecurity certificate was obtained. This compliance must be validated annually, since it must be verified that the PCI requirements are applicable to TeleVía and supported with different tools and documents.

In the corresponding review for the year 2021, the compliance certificate was obtained once again, which mainly seeks to offer protection to cardholder data.

Commitments and future goals

- Structured approach and long-term planning for customer experience maturity, achieving improved customer satisfaction, loyalty and positive impact on ALEATICA's bottom line.
- Create alignment across the organization and bring other teams together around a customer-centric vision, especially with the operational team, who are at the forefront of the service we provide.
- Implementing a Commercial Strategy for CONMEX to deliver the experience of our value proposition to our customers, exploring new ways and uses of roads that contribute to the success of the strategy.
- Increase self-help channels, so that customers can solve their needs almost instantaneously thanks to automation and technological tools that allow us to develop efficiencies and provide an omnichannel experience.
- Ensure good customer service and satisfaction of our customers through surveys and service indicators with precise goals.

We connect our responsible actions **with the future**

137,205
PLANTED
FLORA UNITS



\$8,945,881 PESOS
IN SOCIAL
INVESTMENT



For ALEATICA, if what we generate is not sustainable, it is not development. We respect and strive to improve the environmental and social context in which we operate. We promote human rights and encourage social inclusion.

SOCIAL AND ENVIRONMENTAL SUSTAINABILITY

GRI: 102-11, 102-13, 102-15, 102-16, 102-17, 102-29, 103-3, 201-2, 203-1, 203-2, 301-1, 302-1, 303-2, 303-5, 304-2, 304-3, 305-1, 305-2, 305-3, 305-5, 306-2, 307-1, 308-1, 408-1, 409-1, 413-1, 414-1

Data

SOCIAL INVESTMENT

Pesos

\$8,945,881

RENEWABLE ENERGY CONSUMPTION

4%

from 2020 to 2021 renewable energy generated by our own facilities
Scope 2 emissions avoided:
2: 376 tCO₂e

PLANTED FLORA UNITS

137,205

137,205 individuals on 126.3 hectares.
Emissions offset to the atmosphere:
4,116 tCO₂e

CONSUMPTION OF WATER

-40%

from the distribution network
2020 a 2021

ENVIRONMENTAL TRAINING

1,312

employees trained in
environmental issues

2,460

hours of environmental and social
training



Introduction

At ALEATICA, we work to create adequate social and environmental conditions to operate in balance with the environment and society. We seek to strengthen internal capabilities to ensure the efficient use of resources, mitigate our environmental impacts and create value in the communities in which we operate.

We know that by rigorously fulfilling our operational responsibilities, innovating in our operations and listening to our communities, we will achieve results that harmonize environmental care with socioeconomic development.

Main environmental and social accomplishments

- **Climate Change Diagnosis (Mitigation, Adaptation and Resilience).** In response to the priority issues on the UN agenda and in order to achieve the 2030 Goals and accelerate sustainable solutions to the world's main challenges in terms of climate change, biodiversity and human rights (inequality, poverty, etc.), the Climate Change Diagnosis (Mitigation, Adaptation and Resilience) project was developed.
- ALEATICA developed the **Mitigation Strategy** for the Reduction of GHG Emissions scope 1 and 2 with a 2022-2030 action plan, based on the guidelines of the Greenhouse Gas Protocol, Carbon Disclosure Project and the methodology of the Science Based Targets initiatives (SBTi).
- Additionally, the **Adaptation and Resilience Strategy** for AuNorte, VB and VB was also developed with an action plan starting in 2022, in order to anticipate and reduce the risks associated with the effects of climate change.
- Risks. The following environmental risks were included in the risk inventory and taxonomy.
 - Inability to respond to climate change risk (transition and physical risk).
 - Non-compliance with established goals for the reduction of GHG (Greenhouse Gas) emissions of scopes 1 and 2.
 - Non-compliance with environmental and social regulations.
- We developed projects and/or social actions that have generated an impact in the communities where we operate globally, with a **social investment of \$8,945,881 pesos**, which contributes to the financial sustainability of the company.
- We made progress in the implementation of the social culture, having nine of the Business Units develop the Materiality Analysis to identify the relevant issues for our stakeholders, with actions already having a higher level of maturity, such as Cybersecurity, Health and Labor Safety, among others.



Our social commitment

GRI: 102-13, 203-1, 203, -2, 413-1

The importance of our social commitment lies in creating mechanisms for communication, close interaction and sustainable development with the communities and sectors of influence. We are aware that without the development of our communities, our growth as a company will not be sustainable.

Our social work

Therefore, this year, and with greater openness and reactivation in all sectors, we have progressively achieved the implementation of projects and social actions, which until 2020, due to health security issues, had been suspended or limited.

These projects and actions were implemented in accordance with the four criteria of attention:



In relation to the previous item, in 2021 we continued with the support was granted to the most vulnerable communities due to the COVID-19 emergency. Regarding this situation, although there has already been an economic reactivation, there are still needs to be addressed, in LEP and CONMEX.

Social actions

Community Relationship Plan, CONMEX

The **Community Relationship Plan** program was developed at CONMEX given the concession goes through municipalities in vulnerability conditions. Such plan is based on important aspects relevant and crucial for our stakeholders.

One of such stakeholders are the communities and neighbors located close to the Business Unit, with whom we have the commitment and conviction to establish a constructive long-term relationship and with whom we want to generate an environment of well-being and development, where four relevant projects are being executed.



1. Prevention of Violence Against Women

CONMEX, in alliance with the Women's Institute in Ecatepec and Human Rights in Texcoco, as institutions responsible for legal and psycho-emotional follow-up, served 347 people in 2021, of which 71% were women and 29% men. The results of the evaluations applied to the attendees showed that 89% of the people perceived that the information provided had a very good impact on their personal growth and 11% perceived the information as good, having overall results of high impact.

The assessments showed that the next stages of the project should include an evolution in additional items:

1. Strengthen the strategy for the prevention of gender-based violence against women, particularly family and community violence and femicide.
2. Implement training workshops for the construction of support networks for women to prevent gender violence in the neighborhoods of Ecatepec and Texcoco.
3. Design and deliver educational materials in workshops to promote the prevention of and attention to violence against women. These actions will be considered in fiscal year 2022.

2. Rompe tus Límites

In 2021, training and social crime prevention work was carried out for 326 young people in the municipalities of Ecatepec, Chimalhuacán and Texcoco, through the project aimed at preventing vandalism. The neighborhoods where the trainings were implemented are identified as high priority for CONMEX. The retention rate of the beneficiaries was 82%, which shows the importance of working on a life and career plan, as well as providing psycho-emotional tools.

The project is aimed at fostering social relations with various organizations, including educational institutions, civil society organizations and social groups/local leaders. The acceptance of the project will allow us to continue with its implementation in 2022, with emphasis on Chimalhuacán and Ecatepec

3. Recovery of Public Spaces

In 2021 we modified the model for the recovery of spaces in communities surrounding CONMEX, which consisted of environmental days per family, where one or two members clean the front of their homes to collect solid urban waste and paint the sidewalks, all while respecting hygiene measures and keeping a healthy distance. This new strategy allows us to benefit 19,168 people in 94 streets and 17 neighborhoods of Ecatepec, 30.5% more than the expected goal.

The new service model includes working with local organizations and municipal governments to address the collection and final disposal of waste resulting from the environmental days.

We Are All Road Safety Education Program

Despite the existing limitations, we implemented the **We Are All Road Safety** Education program, which seeks to contribute to the reduction of road accidents, creating awareness of the road culture in the communities, through training on road safety and responsible driving for employees, customers and communities.

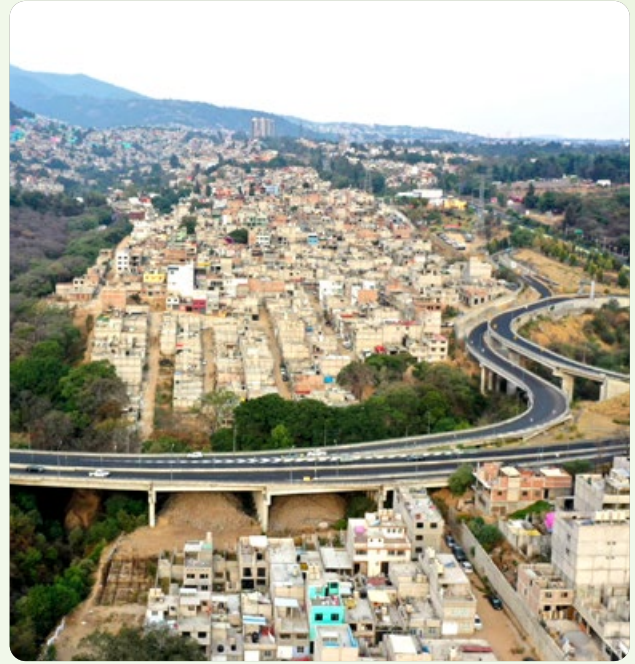
Initially designed to be taught in schools and areas surrounding accident black spots on our roads in each of the Business Units in operation, this program has been extended to important groups that use the roads, generating a positive impact.

In October 2021, AuNorte and Viaducto Bicentenario (VB) in alliance with the Mexican Red Cross, agreed to implement a training program for the drivers of the Banco Mexicano de Alimentos, who represent an important customer of the road, extending this program to more stakeholders.

CONMEX, in collaboration with the Red Cross, carries out a virtual social mapping exercise in one of the six points of greatest road vulnerability identified in Ecatepec. In the Social Cartography (Social Mapping), the involvement of the community is promoted in order to make it part of the identification of risk on the road.

CONMEX has conducted several trainings to different stakeholders from different sectors, with a total of 80 hours of training in 2021.

BUSINESS UNIT	TRAINER	NO. OF TRAININGS	HOURS	TYPE
CONMEX	Schools	40	80	online



Fundación Marillac

In ALEATICA we are committed to the educational development of young people and adults. Therefore, in alliance with Fundación Marillac, we contribute to educational training in the area of nursing at the undergraduate level, to open professional and economic opportunities for low-income women with high academic performance.

In 2021, we joined Fundación Marillac's **MORE NURSES FOR MEXICO** project and granted scholarships to eight female students during the 2021-2022 school year.

In the context of COVID-19, this support takes on special relevance to strengthen medical care in the country, as well as the first line of defense provided by nurses.

Save the Children

ALEATICA, in partnership with Save the Children, supported the Food Security and Protection program to respond to the needs of vulnerable populations in the State of Mexico and Mexico City amid the COVID-19 crisis.

Through this program, 3,200 food packages were delivered, accompanied by 8,000 infographics on educational and informative topics related to COVID-19 protection measures. Training was provided in the detection and attention to cases of child abuse and mistreatment, as well as psycho-social support in 19 Community Child Development Centers (Centros Comunitarios de Desarrollo Infantil, CCDI) in the municipalities of Ecatepec, Chimalhuacán, Nezahualcóyotl and Naucalpan in the State of Mexico, and Iztapalapa in Mexico City. With this, we were able to benefit 377 girls, 403 boys, 741 mothers, 617 fathers, 73 female educators and 17 male educators.

Asociación Civil Vida y Familia Puebla (VIFAC)

In accordance with the main focal point of support to women through the **Cadena de solidaridad** program, LEP donated to Asociación Civil Vida y Familia Puebla (VIFAC) 300 liters of antibacterial gel in response to the current health emergency due to the COVID-19 pandemics, for the protection and care of vulnerable communities; women and their families are the main recipients of the support and grants provided by this organization.

Club de Niños y Niñas

In 2021, support was given to the Integral Development Program, which consists of academic success, sports, art, character and citizenship development, and a healthy lifestyle, and is implemented by **Club de Niños y Niñas**, located in Tecámac and Ecatepec, State of Mexico. The support provided by ALEATICA consisted of a one-year scholarship for 100 children and adolescents between 6 and 18 years of age, in vulnerable situations.

This program aims to provide educational support so that beneficiaries graduate from high school with a life plan for the future, including, for example, college admission, vocational education or employment. The goal is to develop involved citizens and role models in their community, as well as to generate an ongoing commitment to healthy living.

Tecámac-Ecatepec **Club de Niños y Niñas** is the largest of the 4,000 Clubs that exist internationally, which have transformed the lives of more than 4 million children over 150 years. ALEATICA was the main founder of this program.

Asociación Civil Ectágono

500 bushes and trees native to Mexico City were donated to Asociación Civil de Ectágono; such species were employed for reforestation works of gullies located in the west area of Mexico City.



Delivery of the Ecotourism Center Project Pueblo Nuevo Mazahua, AT-AT

With an investment of \$2,069,867.92 Mexican pesos, this year the community of San Felipe Pueblo Nuevo (made up mostly of indigenous Mazahua people) received the investment and/or entrepreneurship project Centro Ecoturístico Pueblo Nuevo Mazahua, located in the municipality of Atlacomulco, State of Mexico. The project consisted of renovating the restaurant and restrooms, service areas, electrical infrastructure and equipment for recreational areas and activities. Its main objective was to generate resources through tourism, the sale of handicrafts, care for the environment and the dissemination of local culture.

Along with personnel from the Federación Indígena Empresarial y Comunidades Locales de México, A.C. (CIELO) and SUSTENTARSE, 262 visits have been made to the communities and 37 training workshops have been held for groups of entrepreneurs in order to analyze and define the projects to be implemented in 2022.



Additionally, as part of the community engagement strategy and following up on the relevant issues resulting from the AT-AT Materiality Analysis, during 2021 we have been close to strategic communities in order to identify the needs and the development of projects for social investment that generate value in the communities where we are present.

Our environmental commitment

GRI: 102-11, 103-2, 103-3, 307-1

At ALEATICA we operate every day with a preventive principle and with a commitment to full compliance with the environmental legislation and regulations applicable to each Business Unit globally.

For better environmental control and the application of best practices, this year we strengthened the environmental management part of the SMS (Safety Management System), seeking its progressive adoption and implementation in all Business Units. At the end of November, AuNorte and VB received the ISO 14001:2015 certification audit, from which a positive opinion was obtained, and they are awaiting the certificate.

Within the SMS procedures, we have developed and applied the procedure for the **Identification of Legal Requirements and other requirements**, where we identify and periodically evaluate the environmental legal requirements, mitigating and controlling any non-compliance that may result in fines or penalties for any omission.

The Sustainability and Customer Service Department, in coordination with the HR area, develops the **Programa Anual de Capacitación de Sostenibilidad** (Annual Sustainability Training Program), designed to extend the technical capabilities (environmental and social) of our team in the Business Units and aligned to the key issues of the Sustainability strategy, as well as to raise awareness and sensitization on relevant social and environmental issues of interest to all our employees. This included a total of 9 workshops with 16.5 hours of awareness-raising for all ALEATICA employees and five courses with 58 hours of technical training for the Sustainability technical team in the Business Units.

In addition, the Business Units have identified the needs of internal personnel, training a total of 1,799 employees in environmental issues, for a total of 2,460 hours of environmental and social technical training.

During 2021, no breach of environmental laws or regulations resulting in any fine or sanction was recorded in any of our Business Units

Climate strategy

GRI: 103-2, 201-2, 305-1, 305-2, 305-3, 305-5; SASB: TR-RO-110a.1, TR-RO-110a.2

Measurement of Greenhouse Gas (GHG) Emissions

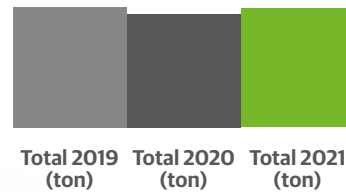
We seek to mitigate our direct scope 1²³ and indirect scope 2²⁴ emissions from fuel consumption and energy consumption, respectively, through the incorporation of new technologies that allow for greater efficiency and renewable sources.

On the other hand, indirect scope 3²⁵ emissions, derived from the loss of electricity due to transport and distribution, use of ports and roads, as well as business travel, are measures for monitoring the value chain, and in a next step we will include our entire value chain.

To monitor and control our emissions, we established the **ALEATICA Carbon Emissions Protocol**, which specifies the governance and methodologies for managing and reporting Greenhouse Gas (GHG) emissions, in accordance with the Greenhouse Gas Protocol accounting and reporting standards, PAS 2050, ISO 14064-1 and ISO 14069. This protocol will allow us to move forward with measures to reduce energy consumption and the progressive low-carbon operation of our assets.

SCOPE 1 DIRECT EMISSIONS (tCO₂e)

2,580.07 2,429.94 2,550.91

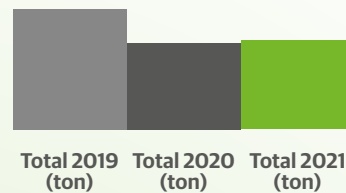


5%

Difference 2021/2020 (%)

SCOPE 2 INDIRECT EMISSIONS (tCO₂e)

5,586.21 4,012.59 4,123.09

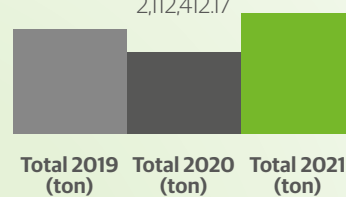


3%

Difference 2021/2020 (%)

SCOPE 3 INDIRECT EMISSIONS (tCO₂e)

2,706,676.24 2,112,412.17 3,121,262.40



48%

Difference 2021/2020 (%)

Scope 3 Indirect Emissions

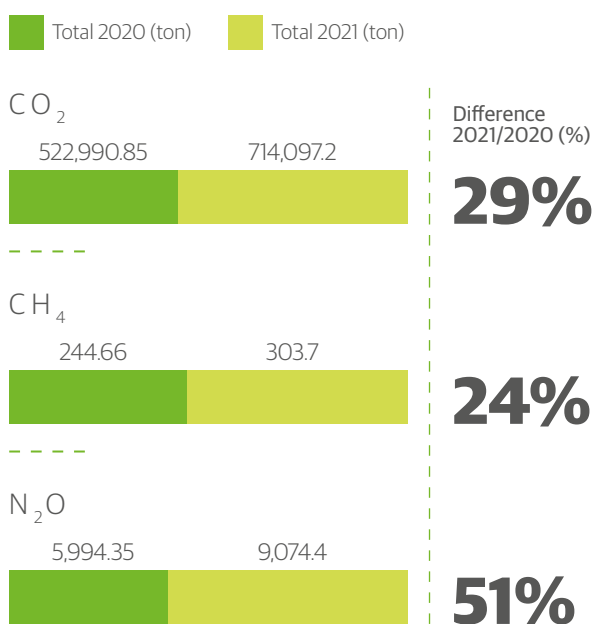
3,121,262.4 (tCO₂e)



Scope 1, in particular, recorded an increase of 5%, due to the increase in operations in the Business Units and the increase in vehicle fleets. Similarly, indirect scope 2 emissions increased by 3% mainly due to the expansion in our operations.

The most significant increase was in indirect scope 3 emissions, at 48% with respect to 2020, which was an atypical year due to COVID-19, as a result of the increase in the use of our roads by customers, derived from the progressive return of mobility in society, in addition to the increase in the use of Uber services in CONMEX. In addition to the above, there was an increase of 161,106 tons of CO₂ (29%), which is the predominant gas in terms of emissions derived from our direct and indirect activities, and represents 99% of them, resulting in a higher generation of GHG emissions.

GREENHOUSE GASES



Climate Change Diagnosis (Mitigation, Adaptation and Resilience)

In response to the priority issues on the UN agenda, as well as to achieve the Goals for 2030 and accelerate sustainable solutions to the world's main challenges in terms of climate change, biodiversity and human rights, the **Climate Change Diagnosis** was developed, focused on 2 lines of action to contribute to the reduction of global temperature, mitigation of GHG emissions and adaptation and resilience to the effects of climate change.

In 2021, we developed the GHG emissions **Mitigation Diagnosis** of scope 1 and 2 for eight Business Units in operation phase that included AuNorte, VB, CONMEX, Supervía Poniente, TeleVía, AuNor, BreBeMi and M45, where the main points of emissions generation were identified and the improvement areas for their reduction were evaluated.

The analysis led to the establishment of the **Mitigation Strategy** for the reduction of GHG scope 1 and 2 emissions by 2030, considering 2019 as baseline, with an annual reduction target of 1% starting in 2022.

Additionally, we conducted the **Adaptation and Resilience Diagnosis**, where we determined the Business Units with the highest degree of vulnerability and risk. This led to the development of the **Adaptation and Resilience Strategy** for AuNorte, VB and VB with an action plan starting in 2022, in order to anticipate and reduce the risks associated with the effects of climate change.

Energy consumption and efficiency

GRI: 302-1, 302-2, 302-4, 302-5; **SASB:** TR-RA-110a.3, TR-RO-110a.3

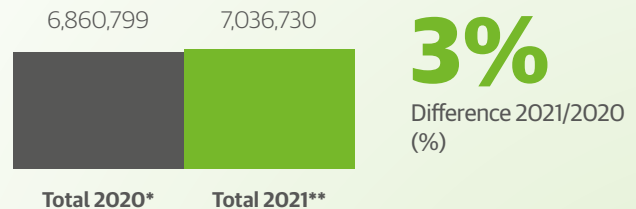
Energy consumption

We seek to transition to renewable energy by 2030, as we consider it essential for us to contribute to mitigating climate change and the environmental impact that conventional energy generates.

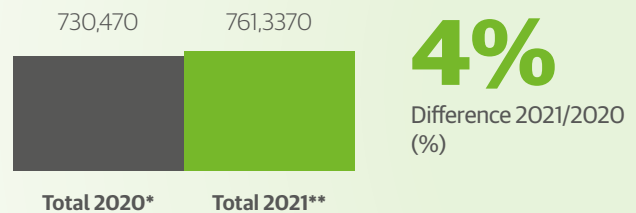
Therefore, in ALEATICA we continue to progressively promote the energy efficiency of our infrastructure and assets, through three main axes: efficient technology, renewable (solar) energies and efficiency of energy/fuel consumption. Our goal is a 5% decrease in non-renewable energy consumption starting in 2022.

We increased by 4% the generation of solar energy generated in our own facilities, **avoiding 376 tons of ALEATICA's scope 2 CO₂e**

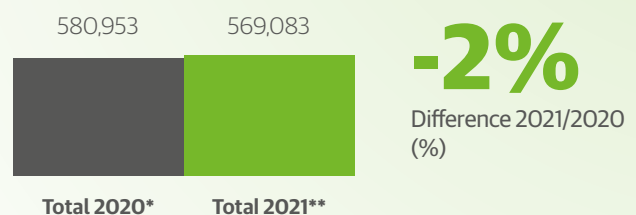
ELECTRICITY CONSUMPTION (KWh)



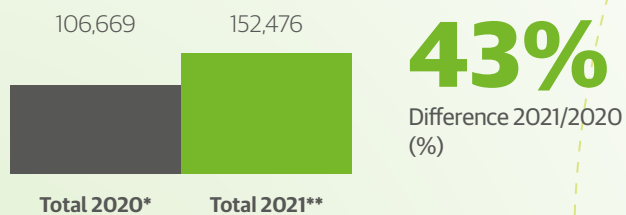
CONSUMPTION OF SOLAR ENERGY GENERATED IN OUR OWN FACILITIES (KWh)



GASOLINE CONSUMPTION (LITERS)

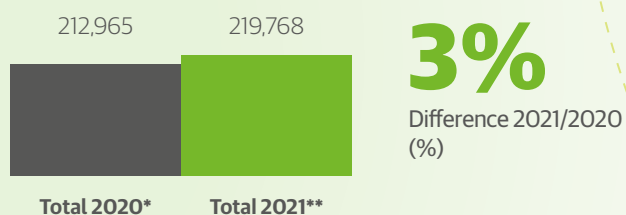


GASOIL CONSUMPTION "DIÉSEL" (LITERS)



There was a 3% increase in the consumption of conventional electricity given that, as from 2021, road operations increased due to an increase in user mobility and the opening of corporate offices.

LIQUEFIED GAS CONSUMPTION "LPG, BUTANE, PROPANE" (LITERS)



* In 2020, information on TeleVía and Mexico Offices was not included.

** In 2021, information on Mexico Offices is not included.



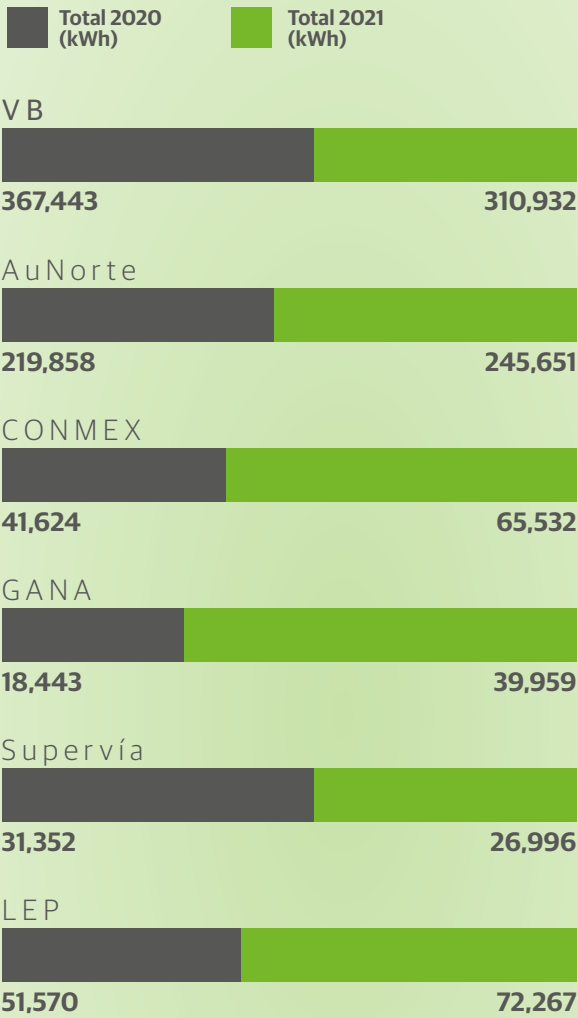


Solar energy

As part of the promotion to optimize energy demand, in ALEATICA we implemented cleaner energy technologies due to the high demand of energy consumption derived from the operation itself.

Therefore, we have invested in the installation and operation of solar panels for self-consumption as part of one of ALEATICA's reduction axes, where we have achieved an increase of 4% globally, with a total capacity of 761,337 KWh, with CANOPSA, GANA, TCTenerife and AuNor representing the Business Units that have increased the generation of clean and self-consumable energy.

BUSINESS UNIT GENERATING RENEWABLE ENERGY



Sustainable mobility

In line with our commitment to sustainable mobility, we promote initiatives that reduce emissions linked to our value chain, in particular to our urban infrastructure customers, including Supervía Poniente, AuNorte y VB customers. We offer incentives to our customers who drive electric and/or hybrid vehicles through the **TeleVía EcoTag** program, which consists of granting a 20% discount to customers driving electric or hybrid vehicles in the urban roads that we operate. In 2021, 163,497 discounted trips were registered, 25% more than the previous year, which contributed to avoiding the emission of 30 tCO₂e per year to the atmosphere and a 23% reduction in CO₂ emissions compared to gasoline or diesel vehicles.

	2020	2021
	JAN - DEC	JAN - DEC
TeleVía EcoTags Placed	568	711
Total Kilometers (AUN, SVP and AUSUR)	273,131	349,777
% Crossings/Discounted Trips (AUN, SVP and AUSUR)	130,884	163,497
% Crossings/Discounted Trips (AUN, SVP and AUSUR)	48%	47%
Discount granted EcoTags TeleVía	54,844	55,830
Decrease in CO ₂ EcoTags TeleVía	-22%	-23%
Tons of CO ₂ EcoTags TeleVía	27.19	30



Water consumption and treatment

GRI: 303-2, 303-3, 303-4, 303-5

We had a 40% reduction in water consumption from the distribution network (pressure pipes, canalization and irrigation canals)

We are aware of the importance of water as a resource and the water stress worldwide, which is worsening day by day. We make the most of this resource for our operations, trying to reuse water as much as possible, through the installation of Wastewater Treatment Plants (Plantas de Tratamiento de Aguas Residuales, PTAR) in CONMEX, GANA, ARM and Terminal Cerros de Valparaíso. Water from such Plants is analyzed (analysis of pollutants) periodically to ensure compliance with the maximum permissible limits, so that we are able to reuse water in other processes such as watering of green areas or roads.

In particular, treated water of Supervía from the control center building is reused for watering green areas of the same facilities, as well as of the road. In addition, we have a rainwater collection system installed; rainwater collected is used for watering flora around Tarango greenhouse. These actions allow us to reduce extraction of surface or underground water, as well as to use water more efficiently, increasing in 104% the consumption of this type of water.

WATER CONSUMED



2020 (m³)*

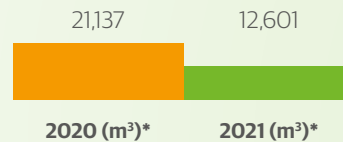
22,610



2021 (m³)*

28,613

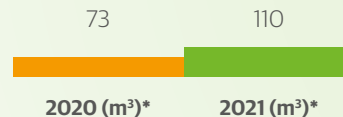
CONSUMPTION OF WATER FROM THE DISTRIBUTION NETWORK (PRESSURE PIPES, CANALIZATION AND IRRIGATION CANALS)



-40%

Difference 2021/2020 (%)

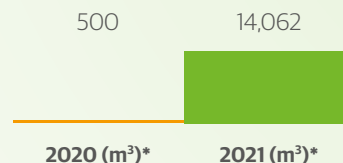
CONSUMPTION OF SURFACE WATER (RIVERS, LAKES, CANALS, RESERVOIRS, ETC.)



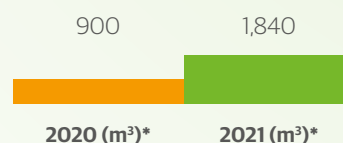
51%

Difference 2021/2020 (%)

CONSUMPTION OF GROUNDWATER (WELLS)



TREATED WATER CONSUMPTION



104%

Difference 2021/2020 (%)

* Information on Mexico Offices is not included.



In 2021, we achieved a 40% reduction in the consumption of the distribution network, compared to 2020. This is mainly explained by the fact that, given that CONMEX is located in an area where water scarcity is a critical issue for the population, the water it consumes is supplied through tank trucks, increasing consumption of underground water from wells by 13,562 m³, compared to 2020. This action allows transfer of the consumption source for this business unit.

This year we have integrated into our environmental indicators the monitoring of wastewater discharges from the Wastewater Treatment Plants (PTARs) to the sewage system, soil, subsoil or bodies of water, which comply with the permissible parameters established by local legislation.

2021 DISCHARGES

133 m³

Discharge of wastewater from mobile toilets / septic tanks

557 m³

Discharges of treated water from wastewater treatment plants (PTAR)

Materials and waste

GRI: 103-2, 301-1, 306-1, 306-2, 306-4, 306-5

Materials consumption

Our materials consumption has a very insignificant annual variation, since due to the nature of the business, major and minor maintenance activities of our road infrastructure are of greater importance for the conservation and optimal conditions of the roads. For this reason, the main material consumed by the Business Units is bituminous or asphalt mixes, acquired from suppliers, which represented 80% of the total consumption of materials in 2021, followed by metals with 11.3% and the consumption of paints or primers with 6%. During the reporting period, a greater number of road maintenance activities were carried out, unlike in 2020 when activities were halted due to COVID-19.

Nevertheless, the activities and/or maintenance needs, expansion or modification of each project, as well as the acquisition of assets or the construction or operation stage in which the Business Units are in, might present variations in annual consumption.

MATERIAL CONSUMED	TOTAL (ton) 2021	%
Consumed paints or primers	82.57	6.03
Consumed oils and greases	1.3	0.1
Consumed bitumen	29.34	2.1
Consumed bituminous or asphalt mixes, acquired directly from suppliers	1,096.71	80.1
Consumed metals (W guardrails, lanes, containers)	154.92	11.3
Consumed fertilizers	0.62	0.04
Consumed salt	3.66	0.26
Total	1,369.12	100



Waste

In order to generate less environmental impact from waste generation, we promote integrated waste management through initiatives that contribute to a low environmental impact, efficient and competitive economy. We dispose of waste in accordance with the legal and regulatory framework of each country and promote improvements through Management Plans and strategic alliances to contribute waste valorization and generate an impact in favor of the environment by promoting best practices in all Business Units

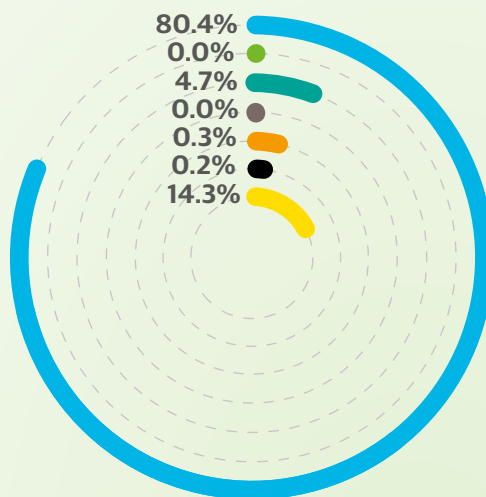
Non-hazardous and hazardous waste

In the case of mixed urban waste and end-of-life tires, most of it comes from waste left by customers on our roads, which is collected and separated during cleaning and maintenance tasks.



The hazardous wastes generated, which are mostly oils, greases and absorbents, come from equipment maintenance activities and are managed in accordance with applicable regulations

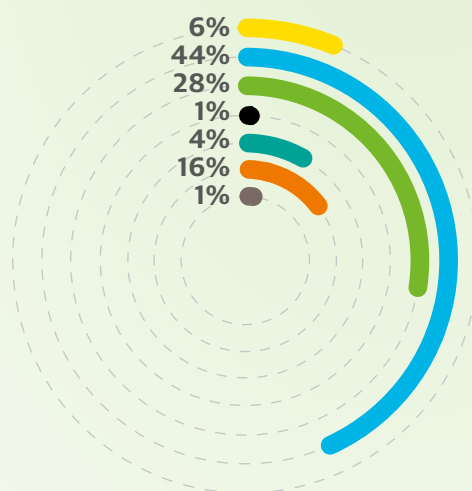
NON-HAZARDOUS WASTE



Total (ton) 2021

Mixed	2,989,091
paper, cardboard	1,423
Electronic	175,135
Wood	200
Metal scrap	12,925
Plastic	8,303
Organic	531,533
End-of-life tires (ELT)	829

HAZARDOUS WASTE



Total (ton) 2021

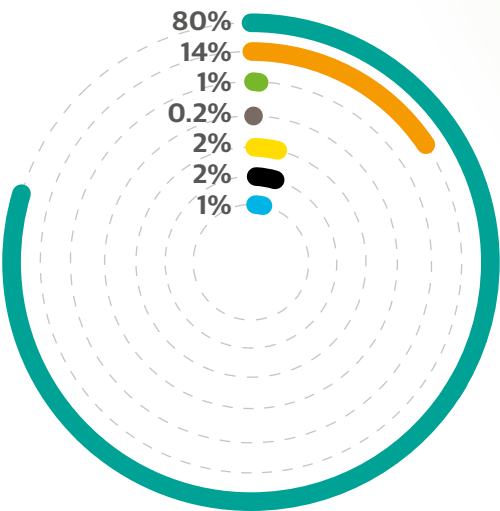
Oil and grease	755
Contaminated absorbents	5,634
Battery waste	3,577
Lamp/fluorescent bulbs	155
Contaminated plastic	574
Contaminated metal	2,000
Oil filter	93

Waste recovery

Concerned about the impacts generated by waste, we have managed to recover high-potential waste to prevent it from reaching landfills and to retrieve materials that can be used in other processes, mitigating the negative impact on the environment.

Our purpose is reaching 20% of recovery of the waste we generate by 2022.

RECOVERED WASTE



	Total (ton) 2021
Electronic	175,135
Scrap metal	30,248
Paper, cardboard	1,423
Wood	200
Organic	5,246
Plastic	5,433
End-of-life tires (ELT)	64

Electronic waste and scrap (metals, steel, among others) are the waste with the greatest potential for recovery, which allows us to generate strategic alliances with companies, foundations or service providers for final disposal, who have the necessary permits and registrations to carry out this activity, thus ensuring proper management of our waste.

It is important to note that the waste generated during the year does not correspond exactly to the quantities reported as recoverable, since the data reported are the quantities managed during the period. In some cases, the waste had been stored since the previous year waiting to be delivered to suppliers.

In 2021, 217,749 kg of hazardous and non-hazardous waste had a second change by being recovered for their exploitation

Electronic Waste Management

In 2021, CONMEX developed a plan for the collection, transfer and final disposal of urban solid waste and special handling waste with the specialized company GEN (urban solid, hazardous and special handling).

Through the company Soluciones de Recicladora Electrónica, a total of 174.91 tons of electronic waste was disposed of, composed of 978 electronic parts, including mice, printers, monitors, hard disks and regulators, among others, which were in warehouses.

Separation of non-hazardous and hazardous waste

LEP completed the adaptation and construction of the solid hazardous waste comprehensive management area, which will allow a correct waste separation and awareness among our collaborators regarding a better separation of the generated waste, as well as compliance with the regulation in the matters.



Clean Industry Certification in Viaducto Bicentenario

Viaducto Bicentenario (VB) was certified in the Clean Industry Certification initiative, granted by PROPAEM in the State of Mexico, through an audit validating compliance with the environmental requirements. The verifying authority gave a positive ruling, and we are awaiting the delivery dates.

Biodiversity and Ecosystem Preservation

GRI: 103-2, 304-1, 304-2, 304-3

One of ALEATICA's environmental commitments is to ensure the protection of the environment, working preventively to minimize the environmental impacts produced as a result of the activities carried out in our Business Units, respecting the ecosystems and biodiversity in the environments in which we operate.

Protection and restoration are a priority. Acting responsibly and promoting respect and care for the environment is essential for the balance of ecosystems, especially in areas of ecological importance that provide environmental services such as water collection and filtration, mitigation of climate change effects, generation of O₂, soil retention and biodiversity protection, among others.

Several reforestation initiatives have been developed on our roads, as stipulated in the environmental impact authorizations

Reforestation in Areas of Ecological Importance

The compensation measures implemented as a result of negative environmental impacts in the construction and/or modernization stage of the AT-AT road have resulted in Reforestation Programs as a way to comply with the environmental authorizations by local governments, totaling 124.72 ha in 2021 reforested with specimens of native species such as holm oaks (*Quercus rugosa* and *Quercus Crassifolia*) and pines trees (*Pinus Montezumae* and *Pinus Greggii*), among others. Since 2018, the beginning of the **Reforestation Program**, a total of 302 ha have been reforested.

This was carried out in compliance with the mitigation measures and the conditions established in the ruling offices on Environmental Impact and Change of Land Use on Forest Land for the development of the **Mexico-Guadalajara Highway project, Atizapán-Atacomulco section**, which intersects two Natural Protected Areas (NPA) classified as state parks: Parque Natural de Recreación Popular El Ocotal and Parque Santuario del Agua y Forestal Subcuenca Tributaria Arroyo Sila, located in the State of Mexico.

Reforestation in right of way

Supervía has implemented the **Reforestation Program** within the right of way by planting 228 trees, 467 wild bushes and 525 ornamental plants, whereby 1.8 ha of forest area were recovered within the right of way.



Flora and Fauna Rescue and Monitoring Actions

During the construction phase of AT-AT, a total of 60,823 plant organisms and 8,400 specimens of various species of fauna have been rescued and relocated for their preservation.

In turn, in the same period, Supervía Poniente carried out the dissemination of 2,000 plants and trees at the greenhouse facilities. Said species will be used in the several restoration and improvement activities for green areas within the road.



Environmental Emergency Response Services

GRI: 201-2, 307-1

Our **Emergency Preparedness and Response Plan DOS-PRCS-08** includes the analysis of possible emergency situations that may occur in the work centers, establishing the necessary measures to prevent their occurrence and, in the event of a potential emergency situation, to respond appropriately to minimize the damage to the environment and to ensure that such damage is controllable and mitigable.

This plan contains a set of guidelines and instructions, which can be applied or adapted to all ALEATICA's Business Units according to the particularities and risks of each project.

In 2022 we will implement the Environmental Management System under ISO 14001:2015, and in compliance with point 8.2, the simulation program will be implemented to evaluate its effectiveness.



Noise control

In order to control pollutants from perimeter sound emissions, Supervía carries out annual noise assessments in 3 specific points of the road, in accordance with the regulation applicable in Mexico City, CDMX NADF-005-AMBT-2013, which establishes the measurement conditions and maximum allowable limits of sound emissions to be complied with by the parties responsible for emitting sources located in Mexico City.

05

100%
COMPLIANCE TRAINING TO
ALL EMPLOYEES WITH
ACCESS TO EMAIL WITH A
100% ACHIEVEMENT RATE



TRANSPARENCY AND CORPORATE GOVERNANCE

We connect transparency
**with decisions that
generate trust**

69 ALLEGATIONS RECEIVED
AND RESOLVED THROUGH
OUR ETHICS CHANNEL



We apply the highest standards of corporate governance. We adopt the best international practices to guarantee transparency.
We seek efficiency and integrity in the service provided.

CORPORATE INTEGRITY

GRI: 103-2, 205-1, 307-1



Introduction

At ALEATICA we understand that integrity, transparency and corporate governance are basic principles that should characterize the way we do business. We want our customers, employees, suppliers, allies, governments and communities to consider us as a reliable and predictable partner. To this end, we rely on the support and expertise of **IFM Investors**, our controlling shareholder, who is a signatory to the United Nations **Principles for Responsible Investment** and constantly monitors our operation.

Our governing bodies are aware of the standards of integrity and transparency that must govern everything we do. These bodies have a direct participation in the decisions that allow the creation

of an updated **Corporate Governance** through the approval of corporate policies. The group's internal procedures have been developed so that its governing bodies receive independent information from the Compliance and Internal Audit Departments, which allows them to have an assessment of ALEATICA's compliance status in different aspects of its corporate life.

In Mexico, ALEATICA SAB de CV is listed on the Mexican Stock Exchange (BMV) and is part of the *FTSE4Good* index for emerging markets in Latin America. As a publicly traded company it is therefore subject to the transparency rules of the securities markets and requires specific ethics and integrity standards.

Main achievements

In the last two years, with the support of our Board and Senior Management, the Global Compliance Department has made a great effort to promote the Compliance program within ALEATICA, as well as to foster transparency and integrity in our company and to reassure third parties about the way we operate.

These efforts became a reality in 2021 with the following actions:



Self-evaluation of the functions we perform with respect to international best practices in order to always be at the forefront.



Reviews of concessions to detect needs in terms of integrity and transparency.



Processing and resolution of 51 allegations received through our Ethical Channel, carrying out the appropriate investigations and defining corrective and disciplinary actions.



Compliance training to all employees with access to email on anti-corruption matters, and on the functions of Compliance and the rules that make up its program, all with a 100% achievement rate.



14 communications on the main issues to be taken into account, using practical examples to achieve a better understanding.

Governance

GRI: 102-18, 102-24

Our parent company is ALEATICA S.A.U., which is a Spanish company based in Madrid, and holds direct or indirect interests in all the companies of the group. Grupo ALEATICA has subsidiary holding companies from which in turn derive the concessionary companies in the following countries: Spain, Mexico, Colombia, Chile, Peru, Luxembourg and Italy. The legal nature of ALEATICA SAU is that of a public limited company, with a single shareholder.

ALEATICA S.A.B. de C.V. is the parent company of Grupo ALEATICA in Mexico, listed on the Mexican Stock Exchange and is the direct or indirect holder of the group's interests in the country.

NUMBER OF MEMBERS

8

Total board size

2

Executive directors

6

Independent advisors²⁶

—

Other non-executive directors

ALEATICA, S.A.B. de C.V.

This Board of Directors is comprised of eight members, six of whom are independent directors, and it is headed by an Equity Board (executive) and the chairman is a managing director, normally appointed by the Ordinary General Shareholders' Meeting (art. 24 Securities Market Law-LMV), which may appoint one or more alternates.

More than half of the Board of Directors is independent

The Board has created two committees:

1. The Audit Committee, made up exclusively of independent directors.
2. The Corporate Practices Committee, also made up exclusively of independents.

On **December 16, 2021**, the Board of Directors of ALEATICA S.A.B. de C.V. created the Environmental, Social and Governance (ESG) Committee comprised of four directors.

The fact that ALEATICA S.A.B. de C.V. is listed on the **Mexican Stock Exchange** brings to the company the **supervision of the National Banking and Securities Commission** and the application of corresponding regulations such as, among others, the Securities Market Law (LMV), the Sole Circular for Issuers and the New Sole Circular for External Auditors (CUAE). These regulations **guarantee the transparency and integrity** of the financial information that the Mexican group provides to the market.

Presence of independent directors is essential as they provide an external and independent vision of ALEATICA's most relevant issues. Aleatica has and intends to have a majority of independent directors. **2 out of 6 independent directors are women.** The chief executive officer and other executive officers of the company do not own company's shares.

Our **Board of Directors and the Chief Executive Officer** are responsible for the administration of the Company (duties of the Chief Executive Officer art. 44 LMV) within the scope of their respective competencies. The Board of Directors shall appoint a secretary and an alternate secretary who are not members of the Board of Directors and shall also appoint the persons to hold such other positions as may be created for the better performance of their duties.

The Board of Directors shall appoint a secretary and an alternate secretary who are not members of the Board of Directors and shall also appoint the persons to hold such other positions as may be created for the better performance of their duties. Shareholders owning shares with voting rights, including limited or restricted voting rights, who individually or jointly hold 10% of the capital stock of the Company, will have the right to appoint and revoke a member of the Board of Directors at a **Shareholders' Meeting**. Such appointment may only be revoked by the other shareholders when the appointment of all the other directors is revoked, in which case the persons replaced may not be appointed in such capacity during the twelve months following the date of revocation. Once such appointments have been made, the other members of the Board shall be appointed by a simple majority of votes, without counting the votes corresponding to the minority shareholders who have made the aforementioned appointment or appointments (art. LMV).

It is important to mention that neither the founders nor their family members have more than 5% of voting rights, on an individual basis



In accordance with the provisions of the Statutes of ALEATICA S.A.B. de CV, **the members of the Board of Directors shall remain in office for one year, that is, the members of the Board will be elected and reelected annually**, and their appointment may be ratified at the Shareholders' Meeting. The directors will continue in office for a period of up to 30 calendar days, even if the one-year term for which they were appointed has ended or if they resign their position, in the absence of the appointment of a substitute or when the substitute does not take office, without being subject to the provisions of Article 154 of the General Law of Mercantile Corporations (Ley General de Sociedades Mercantiles, LGSM).

The Board of Directors may appoint interim directors, without the intervention of the Shareholders' Meeting, in cases in which the term for which they were appointed has expired, the director has resigned, or the circumstances set forth in Article 155 of the LGSM (cases of revocation of appointment of directors) are updated.

The **Company's Shareholders' Meeting** shall ratify such appointments or appoint the substitute directors at the Meeting following the occurrence of such event. The **Board of Directors, through the Corporate Practices Committee, the Audit Committee** and the external auditor, is in charge of overseeing the management, conduct and execution of the Company's business and that of the legal entities controlled by the Company.

In the selection of purposes, values and strategy, the directors, in the diligent exercise of the functions conferred upon them by the Securities Market Law (LMV) and the Statutes, must act in good faith and in the best interest of the company and the entities it controls (duty of diligence-art. 30 LMV). Likewise, they must maintain confidentiality with respect to the information and matters of which they have knowledge by reason of their position in the company when such information or matters are not of a public nature (duty of loyalty-art. 34 LMV).

Average attendance to the board meetings is of 100%, while the minimum attendance requirement for all its members is of 51%

The Board of Directors in the performance of its duties complies with the pillars of Grupo ALEATICA: Security, Sustainability, Service Excellence, Transparency and Corporate Governance, and Passion for the Team and complies with the provisions of the Code of Ethics and the Anti-Corruption Policy and the rest of the policies and rules approved by Grupo ALEATICA. The Board of Directors has policies to assess its members' performance.

In relation to its annual performance goals, in 2021, the CEO of ALEATICA S.A.B had goals associated to budget observance and performance of the programs supporting the company's pillars. Given the nature of our business, where there cannot be directly influence on sales (income), the key indicators of a good business course are effective risk management, value generation due to compliance with the company's pillars and effective management cost.

The CEO of ALEATICA S.A.B takes part in a Long-term Incentive Plan based on the achievement of the internal rate of return of ALEATICAS' assets over a three-year period. None of the short-term and long-term incentive plans, of one and three years, respectively, include a clawback clause as the indicators are measured effectively each year, which allows identifying any deviation.

Subsidiaries

With regard to subsidiaries, the internal standard **DAJ-NORM-01 STANDARD FOR THE COMPOSITION AND OPERATION OF THE MANAGEMENT BODIES**, applicable throughout the group, is to provide homogeneous criteria for determining the structure of the management bodies of subsidiaries and investee companies and the designation of their representatives in these governing bodies.

As a general rule, these subsidiaries must have a Board of Directors as the highest administrative body. The composition and structure of the Board of Directors shall be proposed by the CEO of ALEATICA S.A.U. to the Board of Directors. For the Mexican subsidiaries, this decision to appoint Directors is made by the Board of Directors of ALEATICA S.A.B. de C.V. The CEO shall preferably include in their proposal the following representatives (depending on the number of directors to be appointed by ALEATICA):

- The CEO of Grupo ALEATICA, shall they decide to join.
- The Regional Director
- The Global Chief Financial Officer or a Corporate Chief Financial Officer.
- Other directors with technical or business knowledge of the company's activity, e.g., Directors/Managers of other Business Units, Technical, Operations or Human Resources Directors.

In the event that the administrative body is a Board of Directors, as far as possible, an attorney from the corresponding Business Unit is appointed as secretary.

Regulatory assessment and compliance

As soon as the construction stage begins, the maintenance and renewal of each of the permits to which the projects will be subject begins to be managed. In general, it can be said that, in the construction phase of a highway, the rules on environmental licenses, urban planning licenses and all matters relating to the acquisition of the right of way (expropriations) are particularly important for regulatory compliance purposes. Once the highway is built, the relevant regulatory framework generally addresses compliance with the management quality indicators established in the concession title, the regulations on public roads and the periodic renewal of the licenses and permits associated with the highway. The rights of the customers must also be taken into account at this stage of bringing the highway into use.

To supervise compliance with these permits, we hire external consultants. In addition, we assign a manager within the company to oversee that the hired consultants comply in a timely manner with the management, maintenance and renewal of the permits. We include in the contracts, as a compliance requirement, the adherence to the standards of the **International Finance Corporation (IFC)**.

We conduct additional periodic compliance audits to ensure that activities and documents are in compliance with the guidelines and specifications indicated in the operating permits.

To ensure regulatory compliance, all documents prepared for legal compliance are monitored by the company's legal department, which permanently assists the different departments.

All of our construction and commissioning of infrastructure projects must have a series of municipal, state and federal permits

In 2021 we managed to introduce and implement tools that centralize and concentrate legal knowledge and relevant documentation, as well as information on the existence and evolution of litigation throughout the group. On the human aspect, we have consolidated the monthly virtual meetings, where issues of general interest to all lawyers are discussed.

The coming years will be a period of modernization and adaptation of the Legal Department to an increasingly complex and large corporate group. The implementation and legal effectiveness of **Corporate Governance and ESG** principles will be a continuous challenge for the Legal Department.

Internal audit

ALEATICA has a **Global Internal Audit Department**, which performs in accordance with the mission, organization and powers, functions, competencies and responsibilities established in the **Internal Audit Statute**, approved by the Board of Directors. Its operation is governed by the **International Framework for the Professional Practice of Internal Auditing**, issued by the **Global Institute of Internal Auditors**; said framework is applicable to all ALEATICA's Concessions, Mexico.

Internal Audit provides assurance and consulting services in an independent and objective manner and is designed to add value and improve the Organization's operations. It helps ALEATICA meet its objectives by providing a systematic and disciplined approach to evaluate and improve the effectiveness of governance, risk management and internal control processes.

It reports hierarchically and functionally to the **Audit and Risk Committee** of the Board of Directors, so as to guarantee its independence and the development of the assigned functions. The Internal Audit Department performs the work specified in the audit plans approved by said Committee. These plans are focused on the risks identified by ALEATICA, and their scope mainly includes the following aspects:



Financial and operational processes.



Information Technology and Cybersecurity processes.



Regulatory Compliance

It reports its activity to the **Audit and Risk Committee** on a quarterly basis, including the following aspects:

- Compliance with the Audit Plan.
- Results of the reviews carried out, identifying risks, incidents and areas for improvement of the processes analyzed.
- Degree of implementation of the recommendations issued to solve the incidents and aspects of improvement identified.

Risk management system

GRI: 102-15, 102-29

Our Company is exposed to a wide range of risks inherent to the operations and countries in which we are located, which could affect our performance and hinder or prevent us from achieving our objectives. Within this context, Risk Management plays a crucial role in our organization, as it allows us to manage risks and opportunities effectively, that is, to correctly manage uncertainty in all our activities and projects so that undesirable effects (risks) are prevented or reduced and desirable effects (opportunities) are enhanced or increased, thus contributing to the achievement of planned results.

Risk Management is an institutional process present in each Business Unit

Risk Oversight

Risk Management is an institutional process driven by the **Board of Directors** and supported by the **Audit Committee** and **ALEATICA's Senior Management**, being part of the corporate culture as an empowering element.

Based on the active management of risks at all levels of the organization, it is intended for it to be integrated and applied in all activities and projects developed by ALEATICA, serving as a basis for the decision-making process.

ALEATICA has a **Risk Management policy and standard approved by the Board of Directors**, which has undergone subsequent updates. These documents establish the global principles, guidelines and methodology for consistently identifying, evaluating, answering, supervising and reporting the most significant risks to which each Business Unit is exposed in the course of its operations. Similarly, they define the roles and responsibilities of all participants within this Risk Management framework, as well as the reporting mechanisms.



Risk Management System

The Risk Management System aims to **identify, assess, control, monitor and report** on an ongoing basis the risks to which ALEATICA is exposed. Each of the areas and Business Units are responsible for identifying and assessing, within their area of responsibility, the likelihood and impact of risks that could affect our strategy and operation.

Risks are evaluated considering three assessments, an inherent one, prior to the adoption of controls to mitigate the risk, a residual one, after the adoption of controls, and a target one, after the implementation of future mitigation actions. Our risks are classified based on the categories defined in the risk taxonomy in order to analyze their exposure, as well as their interaction with other risks and not only individually.

Risks are grouped into four categories:

In order to analyze and classify the exposure of the risks identified by the Company, we consider the interaction between them and not only their individual impact



Strategic

Risks related to ALEATICA's environment (internal and external).



Operational

Risks related to ALEATICA's operations.



Compliance

Risks arising from violations of or non-compliance with laws, rules, regulations or internal practices.



Financial

Risks related to financial markets and the integrity of financial information.

Regarding risks, **Business and Functional Units define control activities and mitigation plans** for each identified risk, which are documented and monitored on an ongoing basis.

It is important to consider that, although we focus our efforts on mitigating risks, some of them are beyond our control, for example, changes in regulations, political, economic or social conditions, volatility of exchange rates, etc. However, these risks are identified, evaluated and monitored on a regular basis.

Each risk is assigned a person in charge who must ensure its correct management, as well as the adequate implementation of mitigation plans.

Periodically, **Risk Management** together with the Business and Functional Units monitor the progress of the mitigation plans, as well as the risk behavior. The most significant risks and material changes are communicated and **reviewed by Senior Management and presented and discussed in the Committees and/or Boards of each Business Unit.**

Additionally, **the main executives of the organization and the Business Units** certify on a quarterly basis the knowledge of their risks and the mitigation measures (under their scope of responsibility) that support the control or reduction of their risk exposure.

Training and Communication

The **Risk Management Department** promotes the Risk Management framework and ensures its adoption in all Business Units. Employees, as well as new hires, are trained on the importance of risk management and the role that each one plays within this framework. As part of the actions to strengthen the risk culture throughout the organization, **we implemented a mobile application with which we provide training to each of our employees,** seeking to make risk management part of their daily activities.

In addition, communication campaigns are launched for all employees explaining the importance of risk management and our risk management methodology.



Continuous Improvement

We continue to evolve our risk management processes to support the organization's objectives and strategy:



During 2021, we continued with the process of **training** our employees in risk management.



In order to **identify business opportunities** at an early stage and make the best use of them, their management was included in the risk management framework, as well as in the technological tool used by ALEATICA.



The risk taxonomy was updated to incorporate the transition and physical risks of climate change. Similarly, climate change was incorporated into our risk management framework to ensure that these events are considered in our decision-making process.



In addition, some of our companies implemented the **Business Continuity Management Standard** approved by the Board in 2020 in order to design actions to maintain business continuity and manage crises resulting from an interruption.



In 2022, we will continue to strengthen ALEATICA's risk management by **integrating ESG risks and opportunities** (those risks related to environmental, social and governance factors) into our risk management framework and we will continue our efforts to implement the Business Continuity Standard in the rest of our Business Units.

Main risks

Our organization faces risks and uncertainties. The following is a description of some of the risks that we believe are most important to the business and our performance at this time, although other risks that we are not aware of today or risks that are not material today may arise in the future that could impact our finances and performance; this list is not intended to be exhaustive:

RISK	DESCRIPTION	MITIGATION MEASURES
Sociopolitical	Political and social events as well as changes in regulation that may occur in some of the countries where we operate could adversely affect our business, financial model, results of operations and projections	<ul style="list-style-type: none"> Continuous monitoring of regulatory and legislative processes that may affect our activities, analyzing regulatory changes, preparing the corresponding action plans and implementing the appropriate legal safeguards. Monitoring of changes in the political environment in order to analyze the possible implications and actions to be implemented.
Insecure environment	In recent years, insecurity in Mexico has experienced a period of increasing crime. This situation could worsen and negatively affect vehicle traffic on the highways, as the perception of insecurity around our infrastructure could generate a change in routes (use of alternate routes) and thus a reduction in traffic, affecting our business and financial results. Likewise, toll evasion has experienced significant growth throughout 2021.	<ul style="list-style-type: none"> Increased presence and coordination with local and federal authorities. Surveillance equipment along the infrastructure. Camera systems along the roads. Implementing measures to prevent toll evasion (e.g., tire killers and retractable barriers).
Cyberattacks	ALEATICA's business depends to a large extent on the proper functioning of the cybersecurity controls implemented in the information technology and automated systems in place to administer and manage operations. Since these systems are critical to our business, any significant disruption to our systems or theft of information can affect our financial condition, disrupt operations or damage our reputation.	<ul style="list-style-type: none"> Cybersecurity Framework in all Business Units in order to reduce data theft or unauthorized access to the company's systems. Global cybersecurity awareness program. Strengthening of the cybersecurity program. Cybersecurity incident management process training. Social engineering testing. Cybersecurity maturity level assessment.

RISK	DESCRIPTION	MITIGATION MEASURES
Natural Disasters	Some regions and countries where we operate experience torrential rains, floods, strong winds and earthquakes. Natural disasters could disrupt our operations, damage our infrastructure and adversely affect our operating results and financial conditions.	<ul style="list-style-type: none"> Insurance policies to safeguard our assets. Design and implementation of business continuity plans. Disaster Recovery Center and Disaster Recovery Plan. Training and drills.
Health and Safety	The nature of our activities may cause injuries to our personnel and contractors. Workplace accidents within our concessions could have legal and regulatory consequences in addition to causing reputational damage.	<ul style="list-style-type: none"> <i>Safety Management System.</i> <i>Job Hazard Assessments.</i> <i>Occupational Risk Prevention (PRL) training.</i> <i>Accident Reduction Program (PRA).</i> <i>Implementation of the Near-Miss program for all Business Units.</i> <i>Stop cards.</i> <i>Implementation of document control software for contractors and access control.</i> <i>Improvement of employee vehicles.</i> <i>Crash cushion trucks.</i>
Ethics and Fraud	Given the large number of relationships and stakeholders in the different countries in which we operate, we are exposed to the risk that our companies, employees, managers, suppliers, partners, etc., may be involved in violations of the Code of Ethics (e.g., acts of corruption). Failure to comply with the laws and regulations that apply to us could result in fines and penalties affecting our reputation, business continuity and results of operations.	<ul style="list-style-type: none"> We have a Code of Ethics signed and accepted by all employees. We have developed an Anti-Corruption Policy, as well as different rules governing ethical behavior inside and outside the organization (e.g., procurement, due diligence, gifts, hospitality and entertainment, conflicts of interest, interaction with public officials, etc.). Mandatory Compliance awareness through mandatory training and regular communications.
Legal Proceedings	ALEATICA's operations have been and may continue to be subject to legal proceedings, the resolution of which could have an adverse effect on our business, financial condition and reputation.	<ul style="list-style-type: none"> Analysis of possible means of dispute resolution (conciliation, arbitration or legal proceedings). Follow-up and management of open litigation against ALEATICA.

RISK	DESCRIPTION	MITIGATION MEASURES
Infectious diseases	The pandemic caused by SARS-CoV-2 (COVID-19) has had and could continue to have an impact in terms of vehicle traffic on the highways and its consequent negative impact in terms of revenue, as well as administrative and operational management.	<ul style="list-style-type: none"> • Analysis of scenarios considering the impact of COVID-19 on traffic. • Design and implementation of continuity plans for the different contingency phases (actions and measures to combat COVID-19 in order to protect the health of our employees and third parties). • Internal communications and safety training courses to deal with the health crisis situation. • Implementation of on-site and in-home COVID testing strategies to ensure business continuity and safeguard staff integrity. • Hybrid working model.
Environmental and Social Sustainability	<p>ALEATICA's operational continuity is mainly subject to the link existing between the company and the communities where we operate, as well as our commitment to protecting the environment.</p> <p>Our culture of social and environmental sustainability favors ALEATICA's contribution to benefit society and the environment, while at the same time having a positive effect on the sustainability of the business.</p>	<ul style="list-style-type: none"> • Materiality Analysis and social intelligence studies. • Implementation of action plans with the relevant issues. • Monitoring the implementation of social and environmental action plans.
Climate Change	<p>Climate change brings with it threats associated with increased coastal, pluvial and river flooding, landslides, heat waves, droughts, extreme temperatures and fires.</p> <p>Climate change could damage our infrastructure, disrupt our operations, increase maintenance costs, and cause risks to the physical integrity and health of our employees.</p>	<ul style="list-style-type: none"> • Diagnosis of global climate change in two axes (mitigation and adaptation). • Developing the carbon emissions mitigation strategy for eight Business Units. • Developing the adaptation and resilience strategy for three Business Units.
Financial	<p>We are exposed to various financial risks, including interest rate, foreign exchange rate, liquidity, among others.</p> <p>We have fixed financial obligations, the failure to meet which could impact our liquidity, affecting our business, financial condition and results of operations.</p>	<ul style="list-style-type: none"> • Mitigation measures are described in the Consolidated Annual Statements (see the financial risks section of the 2021 Annual Report).



Zero tolerance to corruption

GRI: 103-2, 205-1, 205-2, 205-3

During 2021, the Compliance Department has conducted courses on various topics:

- Conflict of interest.
- Anticorruption.
- Use of the ethical channel and anti-retaliation.

These courses are aimed at all active employees who have an email address and were 100% completed.

Total number of employees who received specific training on anti-corruption:

In addition, members of the Boards of Directors and key executives of ALEATICA (executive directors, global function directors, country directors and Business Unit directors) annually sign an **anti-corruption certification** stating that they have complied with all applicable laws regarding bribery and corruption, have not offered or given any bribe and have not made any offer or given any payment, good, service, prize, entertainment or anything of value corruptly to any person, including public officials.

All members of the governing bodies, as well as all managers and employees of ALEATICA have been informed and trained on the Company's anti-corruption policies and procedures.

Important communication and awareness-raising actions have also been carried out in matters of anti-corruption, dealing with public officials and fraud prevention, issuing periodic communications through the company's internal newsletter, as well as through emails.

At ALEATICA we act in accordance with our Anti-Corruption Policy, which reflects our adamant position of zero tolerance to any form or modality of corruption, inside and outside our company, in all our operations and with any party with whom we interact, whether public or private

The anti-corruption training conducted during 2021 has been delivered to all Grupo ALEATICA employees with email access. 100% of the employees who were assigned the training have completed it

All third parties with whom we work sign a responsible declaration on, among other things, anti-corruption issues, which also includes a link to the ALEATICA Anti-Corruption Policy. In addition, specific anti-corruption clauses are also included in all contracts. Furthermore, based on the risk assessment analysis for each of them, a decision is made as to whether they should participate in specific anti-corruption training.

The following table shows the type of business partners to whom we have communicated ALEATICA's anti-corruption policies and procedures, for a total of 438.

TYPES OF BUSINESS PARTNERS

34

Agent or intermediary

3

Donor / grantee / recipient of social action and patronage

9

Client

392

Vendor

Risk Management performs an annual corruption risk assessment both for corporate and for the different Business Units. The Compliance Department has identified the main risks related to corruption, which are **bribery, influence peddling and business corruption**, considered to be very high risk due to ALEATICA's type of business, which involves, among other factors, the relationship with public officers. It is ALEATICA's policy not to make any kind of political contributions. This can be seen in further detail in our Anti-Corruption Policy, which can be accessed in the following link: https://www.aleatica.com/wp-content/uploads/2021/06/Politica-Anticorruption_ES-1.pdf - item 4 of ALEATICA's anti-corruption principles.

Similarly, **four members of the highest governance body** received anti-corruption training in 2021.

No cases of corruption were reported in 2021, and no employees were dismissed for corruption nor were any disciplinary measures taken in this regard.

In 2021, 438 third parties were assessed for corruption-related risks

Crime prevention model

GRI: 103-2

ALEATICA has a Crime Prevention Model (Modelo de Prevención de Delitos, MPD) in Mexico, which identifies the criminal risks to which the company is exposed due to the activity it undertakes, based on its organizational structure and the legislation of each country. Such risks are assessed in terms of impact and probability and based on the results, the controls that mitigate the probability of materialization of each criminal risk are identified. These internal controls are documented according to their characteristics, including responsible management, execution frequency, description of the activity and evidence that support such control. Such model is updated according to the legal and organizational changes that occur.

Also, at the end of 2021, a specialized criminal lawyer has been hired to evaluate the effectiveness of the model that was implemented in fiscal year 2020.



Prevention of Money Laundering and Financing of Terrorism

In accordance with the **Federal Law for the Prevention and Identification of Operations with Illicit Proceeds**, the company that manages the automatic toll collection system is considered a regulated entity in terms of **money laundering** reporting. In compliance with this provision, ALEATICA submits monthly reports to the **Financial Intelligence Unit of the Ministry of Finance and Public Credit** on the issuance of cards, as well as the cases in which a customer exceeds the amounts deposited in them according to the limits established by law.



Code of Ethics and Conduct and ethical channel

GRI: 103-2

Our **Code of Ethics and Conduct** establishes the guiding principles for the behavior of all of us who are part of ALEATICA and is the compass that guides the relationships with our stakeholders; partners, customers, employees, suppliers, subcontractors, allies, governments, communities and any group or person who is related to the Company. All of us who are part of ALEATICA, from the Board of Directors to the managers and employees, without exception, are committed and required to know the Code and comply with it in a timely manner.

If you would like to learn more about our Code of Ethics, access here-> (https://www.aleatica.com/wp-content/uploads/2021/06/Codigo-Etico_ES.pdf).

During fiscal year 2021, the Code of Ethics and Conduct has been revised and aligned with our values, linking the conduct guidelines to each of the five pillars and including ethical dilemmas as well as questions and answers to make each of the sections of this new Code more understandable. It is set to be approved in 2022.

The **Code of Ethics and Conduct** is the expression of our way of doing things. It reflects our culture and is a simple and fundamental tool for ALEATICA's work team to always act correctly in any situation.

Ethical Channel

GRI: 102-17, 411-1, 418-1, 419-1

At ALEATICA we have an Ethical Channel managed by the Compliance Department, guaranteeing confidentiality and protection against retaliation for all those who use it, providing for the possibility of anonymous reporting.

This channel is available to all people who are part of ALEATICA and to all its stakeholders. In July 2018, the management of reports entered through this channel was outsourced to the company Lighthouse, seeking to guarantee independence, confidentiality and objectivity, as well as to ensure the anonymity and protection to the people who make use of such channel. Upon receipt of any report, the Compliance Department responds to the informant indicating receipt and, if necessary, requesting additional information. If the Compliance Department decides to investigate, it appoints an Investigation Instructor according to the nature of the allegation. The Investigation Instructor involves those areas deemed necessary to develop the investigation and considers the advisability of adopting precautionary measures while the investigation process underway is substantiated and resolved.

In 2021, **a total of 54 reports have been received, of which 51 were received through the Ethical Channel and 3 through a direct email to the Compliance Department.** All complaints received have been investigated and resolved.

Of the total number of complaints received through the Ethical Channel:

44 were related to labor climate aspects.

7 were related to Ethics & Compliance issues.

3 were general, related to company processes.

In some specific cases, support from independent experts has been requested and corrective and disciplinary measures have been taken.

All complaints are reported to the highest governance body designated for compliance issues at least quarterly.

At the beginning of 2022, the management of the Ethical Channel has been changed, evolving towards a new platform that is managed by Convercent, an external company that is dedicated to the management of ethical channel platforms of multiple companies around the world, always providing all quality guarantees when delivering its services.

The new channel will be called **ICARE**, a name has been chosen to reflect a shared commitment. As a company, at ALEATICA we care about what each of our employees and stakeholders have to say, whether it relates to an unethical or illegal behavior, or a question or concern. As employees, we care about our source of work, we are all ALEATICA and we have a personal commitment to take care of the company and report any unethical or illegal behavior, or any other action that puts the company at risk in any matter.

The following means of contact are available to make any inquiries or to report illegal behavior, irregularities and non-compliance with ALEATICA's internal policies and the Code of Ethics:



Intranet

Intranet > Corporate Integrity > I CARE Ethical Channel



Internet:

<http://icare.aleatica.com/>



Phone numbers:

Chile: 1230 020 3559

Colombia: (+57)-13816523

USA: 800 461 9330

Spain: 900.905460

Italy: 800.727.406

Mexico: 800.681.6945

Peru: 0800.78323

United Kingdom:

0-(808)-189-1053

Other countries: go to <http://icare.aleatica.com/> and specify the country of origin to obtain the rest of the toll-free numbers.

The Chief Compliance and Risk Officer submits to the Audit Committee for approval decisions regarding investigations and proposed measures for the following cases:

- Any allegation, whether material or not, involving an officer of the Group or any member of the governing bodies of the companies comprising ALEATICA or its subsidiaries.
- Any allegations of corruption and/or bribery.
- Any compliance breach that could prevent the General Meeting of Shareholders from declaring that the annual accounts and report provide an accurate description of the company.
- Any compliance breach that indicates a significant deficiency or weakness in ALEATICA's enterprise risk management system.
- Any compliance violation that, if made public, could have a significant effect on the market price of the publicly traded shares.

Periodically, campaigns are carried out to promote the use of the Ethical Channel with the different stakeholders, explaining the ways in which the channel can be accessed, the possibility of anonymous reporting, and our **zero tolerance policy for retaliation**.

During 2021, no reports have been received regarding the violation of human rights, rights of indigenous peoples or non-compliance with laws and regulations in the social and economic areas.

The governing bodies at ALEATICA are aware of the standards of transparency and integrity that must govern our performance. To this effect, these bodies have a direct participation in the decisions that allow the creation of an updated corporate governance through the approval of corporate policies.

In addition, the company's internal procedures have been developed so that its governing bodies receive independent information from the Compliance and Internal Audit Departments, which allows them to have an assessment of ALEATICA's compliance status in different aspects of its corporate life.



Transparency Page

During 2021, we continued our commitment to transparency and accountability by making our transparency page available to the public (<http://www.transparencia-ALEATICA.com.mx/#/>), which aims to be a reference source accessible to all individuals and organizations that want to know the history, operation and functioning of Viaducto Bicentenario (VB) and Circuito Exterior Mexiquense (CONMEX), two of the most important roads in Mexico for the company.

On this page it is possible to consult physical characteristics, as well as relevant data ranging from the public bidding process to the latest modification of the concession title, financing obtained, main construction, operation, conservation and maintenance actions, as well as the pillars that guide all our actions.

In this sense, the Social and Environmental Sustainability projects that contribute to the development of our team, our customers and the communities in which we are present, as well as initiatives to maintain transparency and corporate integrity, can be consulted.

Conflict of interests

GRI: 102-25

This regulation provides for the Ethical Channel as a means of communicating possible or potential conflicts of interest. In addition, on an annual basis, directors and officers complete a declaration of interests with questions relating to professional activity in entities other than ALEATICA, affiliations, interests of family members, etc. and a study is made as to whether there is a real conflict. These results are presented to the Audit Committee.

In the event that an employee or director is involved in a conflict of interest, they shall:

1

Communicate the conflict of interest to the Compliance Department as soon as the potential or actual conflict of interest with business relationships with customers, suppliers or any other organization with which ALEATICA has any kind of relationship is known.

2

Said communication to the Compliance Department must be made in writing by the employee or director involved in the conflict of interest or who must make the decision.

3

Act diligently with respect to the conflict of interest until it is resolved. Thus, as soon as the employee has notified the existence of a conflict of interest, the following measures must be taken:

- Refrain from making decisions that could undermine ALEATICA's decision-making processes.
- Refrain from using the information obtained in the performance of their duties at ALEATICA for their own benefit or for the benefit of third parties.

We have a policy on conflicts of interest applicable in all business units

The Compliance Department analyzes the information on the conflict of interest to determine the impact of establishing a business or employment relationship where there is such a conflict.

There have been no cases of conflict of interest for the following topics:

- For disclosures by a related party.
- With a controlling shareholder.
- For cross-shareholding with suppliers and other stakeholders.
- Due to membership in different boards.



Unfair competition

GRI: 206-1

Unfair competition is a practice that we seek to eradicate in ALEATICA, such as those practices that are contrary to good business faith and that do not meet the ethical standards necessary to be considered honest. In 2021, none of the local Business Units have been subject to investigations, actions or litigation for unfair competition, monopolistic practices or anti-competitive practices.

Procurement structure

GRI: 204-1

Considering that the supply chain of a company like ALEATICA is centered on the suppliers that provide us with sufficient inputs to operate the roads we run in the countries where we operate, it becomes more strategic every day to consolidate our relationship and monitor their operations to be more efficient every day.

That is why in all the Business Units of Mexico we have a Procurement Controller who is responsible for the supervision and control of the purchasing processes.

In order to maintain the best service standards, during 2021, the procurement process is supervised through Supplier Approval, where suppliers are certified from a technical, financial and compliance point of view. Subsequently, through the Legal Function, the legal requirements are verified in the contracting process. Each purchase is approved in accordance with the approval flow defined in the Delegation of Authorities Policy. Additionally, in accordance with the approved audit plan, the Internal Audit Function reviews the design and execution of the different controls established in the **Procurement and Contracting Standard and the Supplier Approval, Registration and Evaluation Standard.**

During 2021, ALEATICA's Internal Audit Function conducted Procurement Audits in the Business Units **CONMEX, AT-AT, Viaducto Bicentenario, AuNorte, GANA y TELEVÍA (Mexico) and ALEATICA S. A. B.**

In 2021, in Mexico we worked with 1,009 suppliers, of which 985 (99.1%) were local suppliers²⁷, and only 24 (.9%) were foreign suppliers. The total procurement expenditure amounted to 4,039 million Mexican pesos

Supplier Evaluation

GRI: 103-3

In order to ensure the continuity of the operation and service to our customers, during 2021 in ALEATICA we continued to evaluate risks, identifying and classifying among operational risks those related to bids, subcontracting and suppliers, construction execution, operation management, labor, environmental, technology and systems.

The adherence of our suppliers to our standards of conduct and Code of Ethics is permanently required and is formalized through the signing of contracts that include a clause on the knowledge and compliance with our Code of Ethics as a condition for entering into a relationship with any company of the Group. Additionally, we carry out a due diligence evaluation process of critical suppliers to formalize their good practices.

The Code of Ethics includes, among others, respect for and compliance with the following guiding principles:



Respect for legality.



Respect for human rights.



Equality and non-discrimination.



Diversity.



Occupational health and safety.



Eradication of child and forced labor.



Privacy of personal data and confidential information.



Respect for free competition.



Prevention of money laundering and terrorism financing.



Environmental protection.

In addition to the submission and signing of ALEATICA's Code of Ethics, a commitment to avoid any form of corruption and to scrupulously comply with all applicable anti-bribery and anti-corruption laws, regulations and procedures is included, as well as to follow the recommendations of International Organizations such as the OECD and the United Nations.

In turn, with the **RHS-NORM-20 Standard for the Homologation, Registration and Evaluation of Suppliers**, the due diligence process is strengthened and anticipates the correct measurement of risks that may arise from the potential relationship with critical suppliers. In each Business Unit or corporate area, the operating unit that maintains the direct relationship with the supplier initiates the analysis process by means of the scope test that determines both the depth and the perspective of the analysis to be developed: compliance, financial and/or technical analysis.

At ALEATICA, we do not classify our suppliers as "critical" or "non-critical"; all suppliers are assessed to ensure their compliance with the technical, financial and compliance requirements defined in the **RHS-NORM-20 Standard for the Homologation, Registration and Evaluation of Suppliers (S&P)**

The compliance analysis perspective identifies risks associated with compliance, legal, regulatory or reputational principles or facts. In the financial analysis, solvency, liquidity and indebtedness ratios are calculated based on the financial statements of the third party (supplier) and available qualitative information is evaluated in terms of news of incidents and financial capacity. Finally, the technical perspective is based on internal information sources such as previous experience, as well as external information, such as project references, incidents and degree of potential conflicts.

During 2021 all our procurement processes were strengthened, providing legal certainty to our Business Units of Mexico by signing service contracts in accordance with the standards established by local legislation, as well as our regulations.

To ensure that there are no suppliers with significant risk in the operation, during 2021 we continued to request our suppliers to sign the **Responsible Declaration**, issued by the Compliance area, where they declare to be within the legal framework and agree to adhere to ALEATICA's Code of Ethics and the Anti-Corruption Policy.

No operations of our own or of our suppliers were identified as involving child labor, forced labor or human rights violations.

During 2021 all our suppliers continued to sign an external questionnaire for the third-party due diligence process (Suppliers), issued by the Compliance area, thus ensuring that no operation and/or supplier registration was carried out beyond regulations. In this questionnaire, we include information regarding control procedures and policies implemented to ensure that suppliers comply with the legislation in force in the country where they work, as well as safety and labor regulations, and human rights aspects, with regard to their employees.

In 2021 we did not have a risk identification methodology. By 2022, the **Supplier Homologation, Registration and Evaluation Standard:**

1. **Sustainability Assessment** will be implemented. During the supplier homologation process, it will allow to confirm the supplier risk (low, medium, high) in environmental matters upon the service provision.
2. Once the supplier has provided its service (totally or partially), the "Aleatica's Supplier Service Assessment" will be performed, analyzing, among other topics, aspects related to sustainability. (Click here for additional information).

The **Procurement and Contracting Standard** defines the following basic principles in supply chain management:

Principle of competition: In the procurement processes, at least three interested parties will be invited, unless this standard expressly provides otherwise. Invited candidates should have a homogeneous and sufficient level for the execution of the corresponding agreement in such a way that, in principle, ALEATICA should be willing to contract any of them. Unless there is a grounded reason, suppliers which according to previous experiences have obtained in ALEATICCA a "non-reliable" assessment issued in the terms provided for in the RHS-NORM-20 Standard for Supplier Homologation, Registration and Evaluation Standard, should not be invited.

Principle of disclosure, equal treatment and non-discrimination: it requires that the call for bids be made known to interested parties under the same conditions, giving the same information, and be received equally in advance of the day of submission of bids. It also requires that the selection be carried out taking into account objective criteria, mainly of a technical (safety processes, proven experience, execution time) and economic nature.

Principle of confidentiality: during the selection process, maximum confidentiality criteria should be taken into consideration. Information provided by the companies involved in a selection process may not be disclosed. Likewise, ALEATICA will not provide confidential information or information including personal data unless it is warranted and with the previous execution of a Confidentiality Agreement.

Principle of efficiency: the proper and timely contracting by ALEATICA is of essence for compliance with its objectives. Therefore, all formalities provided for in this document should be carried out timely and promptly.

Principle of transparency: The assessment criteria should be expressly set forth in the Invitation Letter, unless the Head of the Requesting Area considers it is to the best interest of the bidding process not to share them with the interested parties. On the other hand, once the supplier has been selected and an agreement executed, the person in charge of the requesting area will give notice on the award decision to the other non-selected candidates. This communication will briefly expose the criteria considered for the selection, without sharing the specific terms and conditions of the winning offer.

Principle of documentation: all actions in each procurement process should be document in such a way there is evidence thereof and they can be subject to revision and verification.

Principle of sustainability: Suppliers will be requested to comply with the social –safety and labor– and environmental regulatory commitments required by law, as well as the support of this compliance or monitoring thereof. Additionally, once the participating company is hired, ALEATICA reserves the right to conduct any review, audit or verification of the information requested in this process, in which it may request information and documentary evidence from the supplier to prove and ensure that the company's actions are aligned with the international sustainability standards to which ALEATICA is committed, and monitor ESG aspects (environmental, social and corporate governance) that allow, gradually, to comply with the indicators related to suppliers and supply chain, avoiding any conduct that, even without violating the law, may harm the reputation of the participating company and, consequently, of ALEATICA. This principle was incorporated in the last updating of the Standard and its implementation started in 2022.

In addition, the implementation of the **Sustainable Responsibility Statement** will start in 2022. In such statement, the supplier agrees to commit to environmental and social care and, in this regard, to work to reduce the social and environmental impact of its operations and to promote a responsible behavior in its value chain.

This assessment should be performed for suppliers that provide services related to:



Execution of social or environmental projects.



Major or minor maintenance projects.



Construction or demolition projects.



Lessors of major and minor machinery or vehicle fleets.

The person in charge of the Requesting Area will contact the person in charge of Environmental or Sustainability Control, indicating the name of the supplier, the supplier's contact information and the scope of the service or product to be contracted. With this information, the person in charge of Environmental or Sustainability Control will request from the supplier the documents on environmental regulatory compliance that are applicable according to the scope of the services and products offered. Once the sustainability assessment has been carried out, the Environmental Control Manager will issue the certificate with the associated environmental risk.

CONMEX has already started an environmental impact assessment, using a matrix to identify and evaluate environmental aspects and impacts.

From the social perspective, in our **Human Rights Policy** we involve suppliers by indicating that all actions of ALEATICA and the people with whom it has a relationship must keep a scrupulous respect for human rights and civil liberties, included in the Declaration of Human Rights of the United Nations. Similarly, our Procurement and Contracting Standard defines the **Principle of Disclosure, Equal Treatment and Non-Discrimination**: It requires that the call for bids be made known to interested parties under the same conditions, giving the same information, and be received equally in advance of the day of submission of bids. It also requires that the selection be carried out taking into account objective criteria, mainly of a technical (safety processes, proven experience, execution time) and economic nature.

By 2022, our goal in the Procurement Area is to work with suppliers that comply with environmental and social legislation. That is why the Materials Sourcing Policy, which is in the process of approval, states the commitment to **“encourage the development of competencies, skills and capabilities with materials suppliers with the objective of promoting continuous improvement in the development and implementation of materials with lower environmental impact within the supply chain”**.

Human rights

GRI: 103-2, 410-1

Through our *Human Rights Policy*²⁸ we establish an institutional commitment to respect and protect the human rights of employees, customers, suppliers, communities and any stakeholder that has a relationship with ALEATICA.

These are the main initiatives and guidelines that serve as a foundation for us to work and ensure compliance with human rights at all times:

- Universal Declaration of Human Rights.
- United Nations Global Compact.
- Tripartite Declaration of the International Labor Organization (ILO) concerning Fundamental Principles and Rights at Work.
- OECD Guidelines for Multinational Enterprises.
- United Nations Guiding Principles on Business and Human Rights.

ALEATICA Human Rights Principles:

- Eradicate forced labor
- Work for equality and combat discrimination
- Providing decent work
- Ensure people's health and safety
- Respecting minorities and indigenous communities
- Promoting freedom of association and collective bargaining
- Eradicate child labor
- Protect people's environment
- Physical security, security companies and human rights

During 2021 no human rights violations have been recorded or reported within the organization by contractors or other stakeholders

For the second consecutive year we carried out the following actions to prevent and address any human rights violation:

- Compliance with applicable labor legislation and contracting processes for goods and services.
- Code of Ethics governing the conduct of our employees.
- Responsible Procurement Policy, which includes clauses to ensure respect for and protection of human rights.
- Human rights clauses, aligned with compliance with labor, environmental and occupational safety regulations
- Clauses establishing the obligation to adhere to and comply with our Code of Ethics in all labor contracts of the Group's companies.
- Consultation, questions or complaints through our Ethical Whistleblower Channel via the Internet, telephone and email.
- Analysis of the work environment in our work centers to prevent and resolve any situation that could violate the human rights of our employees.
- In all the companies that make up the Group, processes and practices have been adopted to ensure respect and protection of human rights, the right to free association and the eradication of forced and/or compulsory and child labor.

Human Rights training for Physical and Property Security personnel.

100% of ALEATICA's employees who are part of the Physical and Property Security area have received training on human rights issues.

In previous years, it was not a requirement for the physical security contractors of the Business Units that require these services to provide their personnel with training on human rights issues;

however, they are now part of the obligations to be fulfilled in the bidding and contracting processes of these companies. In the terms of reference of the bids managed by the Purchasing areas of the Business Units, the inclusion of this type of training is valued. It is estimated that 70% of such personnel have received some type of training in human rights.



Commitments and future goals

Currently, ALEATICA has a solid Compliance program, based on international best practices, so the efforts of the area for the next three years are focused on consolidating a Compliance culture throughout the organization, encouraging reporting and making processes more efficient, without losing the rigor required in them, and strengthening participation as a strategic ally in all business operations.

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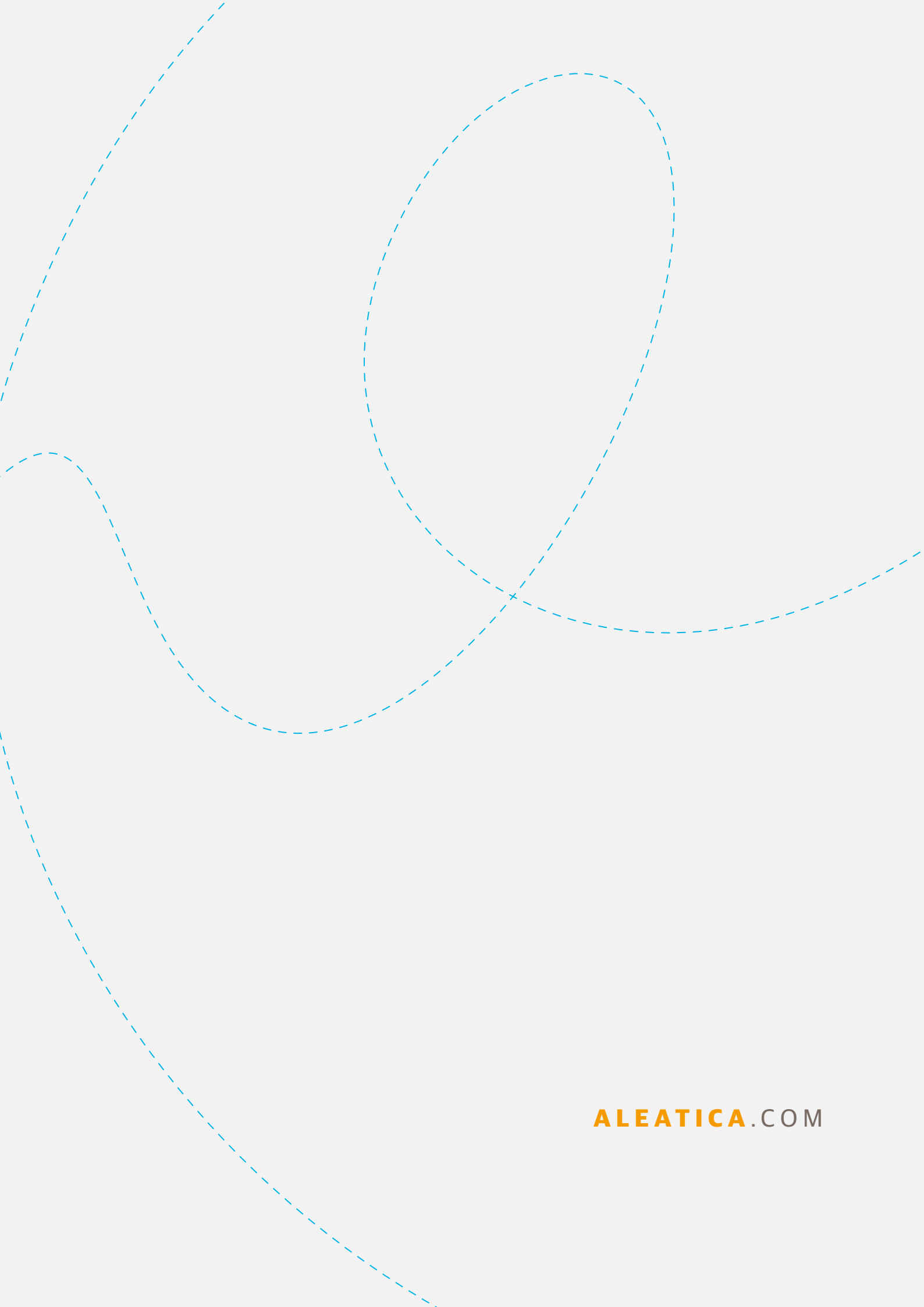
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Notas

- 1 ALEATICA Mexico's Financial Consolidated Units are as follows:** Administradora Mexiquense del Aeropuerto Internacional de Toluca (AMAIT), Circuito Exterior Mexiquense (CONMEX), Grupo Autopistas Nacionales (GANA), Viaducto Bicentenario (VB), Autopista Urbana Norte (AuNorte), Atizapán - Atlacomulco (AT-AT) y TeleVía. Libramiento Elevado Puebla (LEP) and SuperVía Poniente (including SuperVía Poetas and Viaducto elevado Luis Cabrera) are taken into account for operational calculations in Mexico.
- 2** Grupo ALEATICA refers to the Corporate entity that rules in all countries in which the group operates.
- 3** This report only includes the companies that are Business Units in Mexico, which are as follows: Aeropuerto Internacional de Toluca, Libramiento Elevado Puebla, Circuito Exterior Mexiquense, Grupo Autopistas Nacionales, Viaducto Bicentenario, Autopista Urbana Norte, Atizapán - Atlacomulco, TeleVía and Supervía Poniente.
- 4** Internal rate of return
- 5** MXN/USD exchange rate. 2019: 19.2618; 2020: 21.4961; 2021: 20.2818.
- 6** This table only shows the Business Units of Mexico that have completed the Materiality Analysis; the remaining Units are undergoing this process.
- 7** Earnings Before Financial Income, Taxes, Depreciation and Amortization, which is equivalent to the EBITDA (Earnings Before Interest, Taxes, Depreciation and Amortization).
- 8** All figures are as of the end of 2021.
- 9** Safety is understood as everything that encompasses the scope of the Health and Safety pillar. Occupational Safety, Road Safety and Health Surveillance-Medical Service.
- 10** The term Near Miss is an Anglicism, which in Spanish means Quasi-Accident. Near Miss is defined by the National Safety Council as an unplanned event that did not result in injury, illness or damage, but had the potential to cause injury, illness or damage.
- 11** Safety Management System based on ISO 45001, ISO 14001 and ISO 9001.
- 12** Mexico Units that are ISO 45001 certified: GANA, AuNorte and VB.
- 13** Lost Time Injury (LTI). Indicator of occupational accident rate that measures lost time injuries.
- 14** Refers to the Lost Time Injury (LTI) indicator.
- 15** Only contractor indicators since 2020.
- 16** iRAP (International Road Assessment Programme) is an independent consulting firm that issues an opinion on the road safety status of the roads they analyze. They rank the roads from 1 to 5 stars (1 being the lowest value and 5 the highest value), analyzing different issues such as containment systems, sound barriers, road design, operating speeds and others.
- 17** The project started in September 2020.
- 18** Personnel in charge of making hand signals for traffic control procedures using flags, signs or lamps to allow the safe and expeditious movement of vehicles and pedestrians through or around work zones. Taken from the Mexican Institute of Transportation: <https://imt.mx/resumen-boletines.html?IdArticulo=546&IdBoletin=195>
- 19** Applies to employees and contractors.
- 20** Absenteeism hours are considered as: Hours within the workday in which there was no employee activity due to excused absences, unjustified absences, unpaid leaves of absence and suspensions (breaks, vacations and sick leaves are not considered).
- 21** The higher average compensation is due to a higher proportion of men in executive positions. ALEATICA is actively seeking to retain, promote and hire women in more senior positions and achieve gender parity.
- 22** All figures are as of the end of 2021.
- 23** Scope 1: Fuel consumption.
- 24** Scope 2: Energy consumption.
- 25** Scope 3: Road/port use, business travel, commuting, electricity transmission and distribution losses.
- 26** While the applicable law does not provide a specific definition of "independent director", it is considered that an independent director is not subordinated to personal, wealth or economics interests in his/her management and performs his/her duties free of conflicts of interests. In addition, no director may be considered independent under any of the assumptions mentioned in subsections I. to V. of article 26 of the Securities Market Law.
- 27** For ALEATICA, the geographical definition for "local" corresponds to "country".
- 28** See our Human Rights Policy at: <https://colaboradores.ALEATICA.com/?wpdmdl=13779>

Diseño: generadorestudio.com





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