



2018 ANNUAL REPORT

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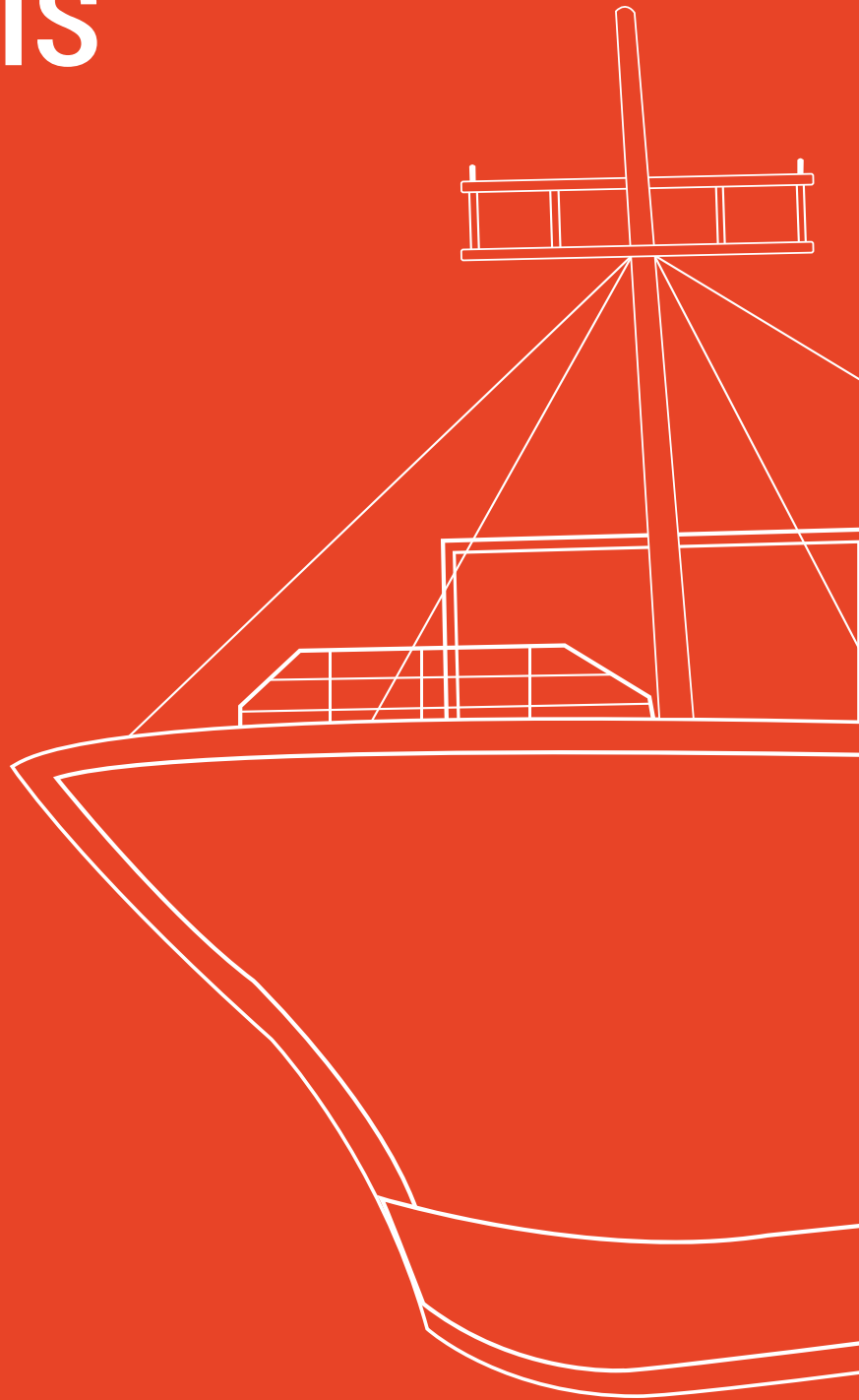
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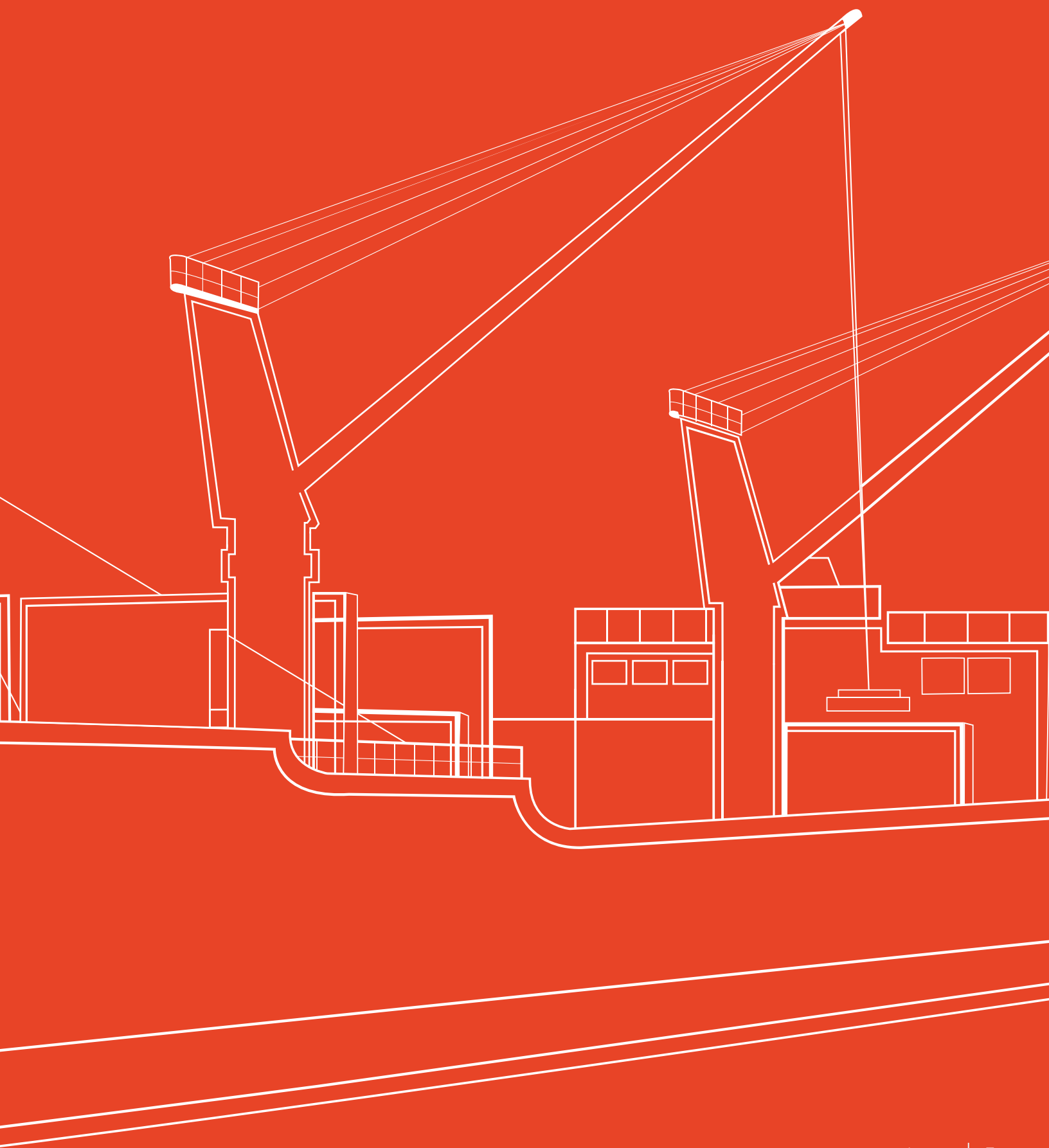
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Annexes

1

About this report





About this report

(102-45) (102-48) (102-49) (102-50)

For the third year in a row, COMPAS S. A. presents its 2018 Annual Report with the information on its economic, social and environmental performance for the period from January 1 to December 31, 2018 and the information corresponding to **COMPAS'** operation in Colombia. Taking into account the materiality exercise carried out in 2018, the contents of the Report were defined, which seek to respond to the interests and expectations of the stakeholders and which, in turn, are aligned with the Corporate Strategy. Any clarification or exception to the coverage of the information is explained throughout the text. Likewise, throughout the report, any change in the figures, coverage and limit (if any) of the report are indicated where it applies.

(102-32) (102-51) (102-52)

This report has been formally reviewed and approved by the Presidency and the Company's Steering Committee and is published annually. The last version of this report was published in March 2018 and explains the management and results of the 2017 year. The Financial Statements emitted under the International Financial Reporting Standards (IFRS) were audited by an independent third party, the firm EY in its capacity as Fiscal Auditor.

(102-54)

Each chapter contains information on the management, results and goals, in accordance with the Global Reporting Initiative (GRI) Standard, in its "Essential" option, which is identified through the respective code for each indicator. For the preparation of this report, the principles established by GRI were fulfilled.

(102-48)

The re-expressions in the values of the indicators are indicated as footnotes of the respective indicator.

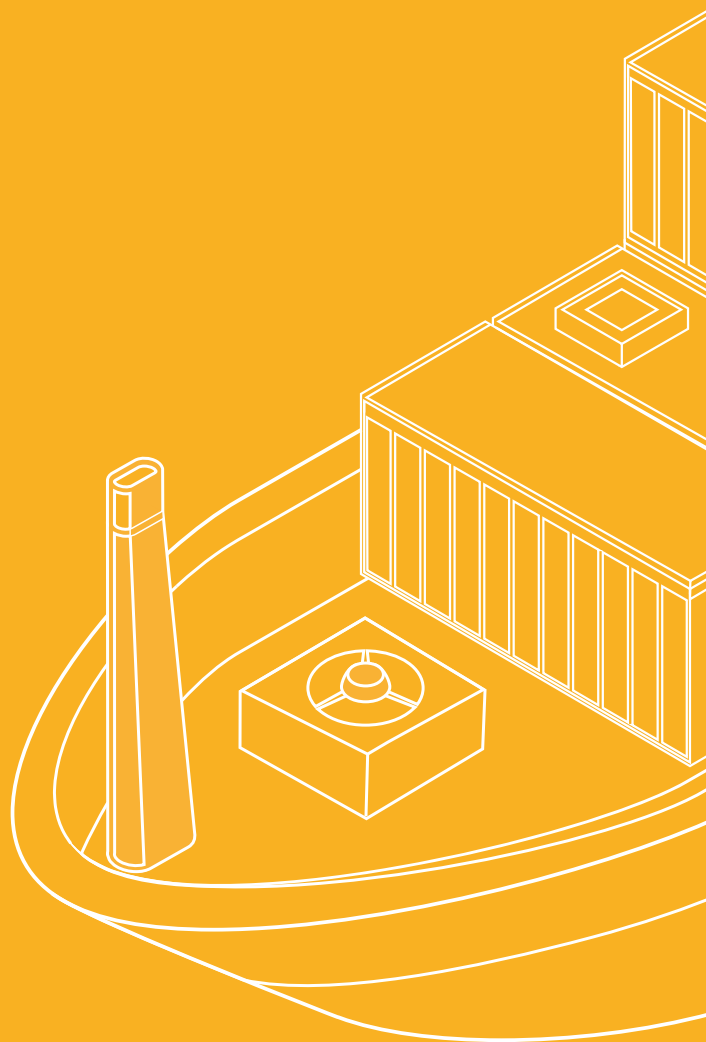
With this report we also comply with the commitment of sending the Communication of Progress (COP) annually to the Global Compact.

**(102-53)**

The digital version of the Report is found on the Company's Webpage www.compas.com.co. For any consultation or additional information, please contact Diana Carolina Álvarez, Director of Communications and Sustainability at her email dalvarez@compas.com.co or Luis Haroldo Arrieta, Leader of Sustainability, at his email larrieta@compas.com.co.

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The CEO's report



A Letter from the CEO

(102-14, 102-15)

In 2018, **COMPAS** completed six years of operation as the only multipurpose port network in Colombia, a period in which we have recorded important milestones, achievements and challenges. The balance is quite positive; our organization has decidedly integrated sustainability from the strategy. Our corporate guidelines mark not only the path of a business model that seeks sustained growth, but begins with an ethical, transparent action, in which the development of employees, the communities of the area of influence of the port installations and suppliers – key stakeholders with whom we interact – prevails.



As a sign of our commitment to the country's competitiveness and focused on improving our infrastructure to provide excellent service to our customers, we have invested approximately USD 200 million in infrastructure and equipment to equip the **COMPAS** network terminals between 2013 and 2018. The investment in the construction and start-up of **COMPAS** Aguadulce, our most important work in infrastructure and which required an investment of approximately USD 120 million, stands out in this investment. All this contributes not only to customers receiving world-class service, but the port and logistics sector of the country have the necessary conditions to respond to the challenges imposed by foreign trade.

However, we are proud to be the only port company in the country adhering to the United Nations Global Compact in support of the ten principles that this organization promulgates. Thus, we published our first Communication of Progress (COP) in 2018, corresponding to our management in 2017, with which we also complied with the presentation of the report based on the Global Reporting Initiative (GRI) Standards, as an exercise of transparency and communication with our stakeholders. In 2019, we will publish our second COP with management results for 2018.

The year 2018 was one of recovery in terms of foreign trade; this was reflected in the moderate increase in cargo volumes in Colombia, a natural situation in a context of growth of the country below its potential. Despite this slow growth of the economy, in **COMPAS** we managed to increase the volumes handled through our port network three times the growth of the country, reaching 8% in relation to 2017. This confirms that we are an organization in continuous growth and with projects to expand our infrastructure, to contribute to the development of the logistics sector and boost national competitiveness. A sample of our process of organizational evolution is the merger by absorption made between **COMPAS** (the absorbing company) and BOSCOAL OPERADORES PORTUARIOS (the absorbed company). With this change, we are now one company.

Last year, the Company's consolidated operating revenues had an 11% increase in relation to the income obtained in 2017, a very relevant growth considering that 2018 is the first comparative year, taking as the base the entry of the most important investment in **COMPAS'** history, which was the construction of the terminal in Aguadulce. For its part, the EBITDA presented an 18% growth, attributed to a better mix of cargo and strict control of operational and administrative expenses.

Undoubtedly, 2018 was a year of great achievements and recognitions. The Colombian Society of Engineers (Sociedad Colombiana de Ingenieros, SCI) awarded us the National Engineering Prize for the construction of our **COMPAS** Aguadulce Terminal, the most modern and technified terminal on the Colombian Pacific for the management of grains and coal. In this port facility we registered the historic load of 74,851 tons of metallurgical coal; this is the largest shipment of this type of cargo that has left the country through the port of Buenaventura.

In the social sector, we continue to work within the framework of our three lines of action: water, education and inclusive business. At **COMPAS**, we understand that the Company's growth goes hand in hand with the development of the communities of our areas of influence. For this reason, whether through allied entities and organizations or our Foundations, we seek to contribute to the needs identified in these communities.

In this regard, it is worth highlighting Phase II of the Sustainable Agriculture program, which is implemented in Tolú because it registered several positive results: the producers obtained a significant increase in their income and high returns in cassava and sweet potato crops (on average, 19 tons per hectare). With this, we managed to contribute to the food security of 20 producers and their families, as well as generating added value to traditional agricultural products of the region.

Now, during 2018 we continued with the strengthening of our organizational culture with the implementation of the VALORarte program, which seeks to strengthen the experience of our six corporate values, through recreational activities for all employees. Likewise, in the management of human talent noteworthy is the development of the second part of the Continuous Education Diploma in Port Management in alliance with the EAN University as part of the annual summons of the Continuing Specialized Training Program of National Learning Service (SENA, for its acronym in Spanish).

In the environmental field, it should be noted that we recorded zero environmental incidents, which ratifies not only the fulfillment of the corporate goal in the matter, but gives an account of a clean, efficient and technified operation. For the first time, we conducted the quantification of the carbon footprint in each of our terminals, which allows us to analyze our performance in the matter.

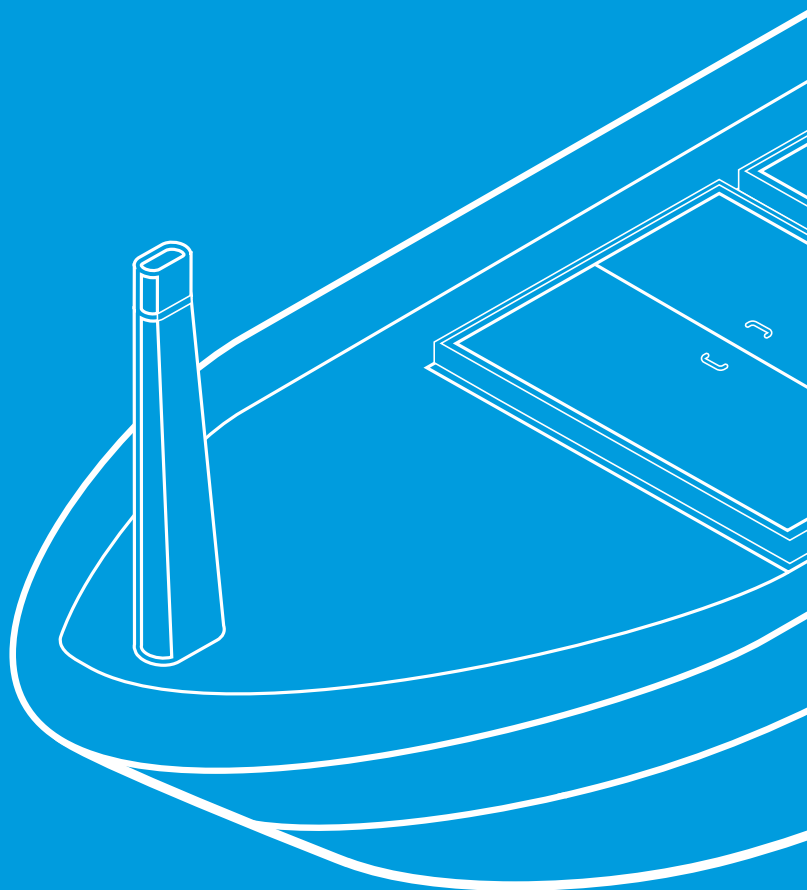
Without a doubt, 2019 presents a great opportunity for growth for the Company. In the first quarter we started the construction of the expansion project of our terminal in Tolú, with which we will have a position of additional docking and we can handle other types of cargo; all this in order to boost the country's foreign trade and generate development in the region. To this, permanent actions are added to strengthen the infrastructure of the other multipurpose terminals that are part of our port network, which will help increase the cargo volumes.

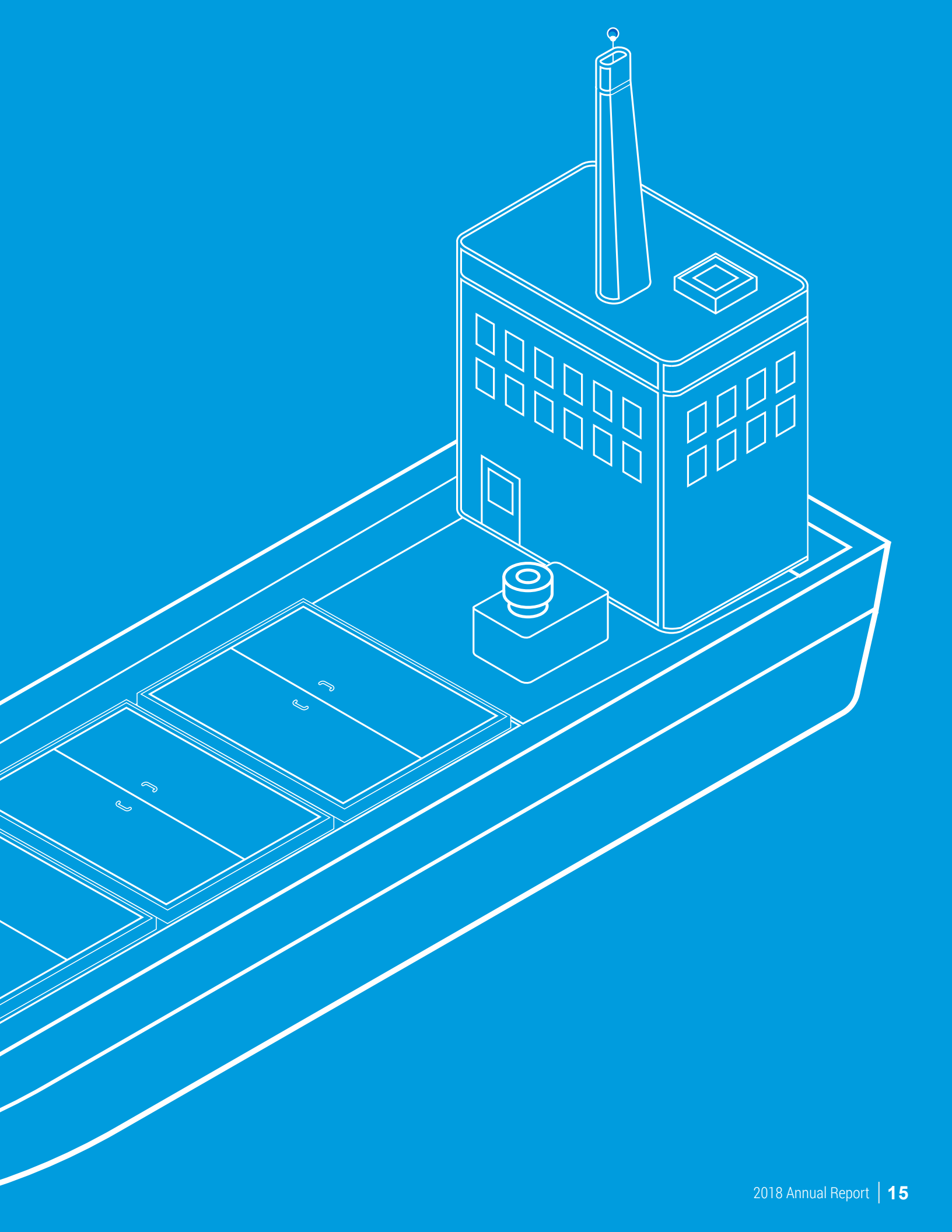
Finally, on behalf of the Steering Committee, we thank our shareholders and other stakeholders for the support and trust that they place in our organization. To our employees, congratulations for contributing to the achievement of each of the Organization's achievements during 2018.

Alberto Jiménez Rojas
COMPAS S. A. CEO

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About COMPAS





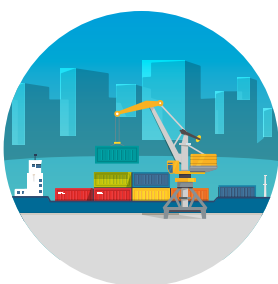


A Colombian
company
created in 2012

History

(102-1, 102-2)

COMPAÑÍA DE PUERTOS ASOCIADOS S.A. – **COMPAS S.A.** is a Colombian company created in 2012, which provides port and logistics services through the only network of multipurpose ports in Colombia, making it a strategic ally for foreign trade. The support of its shareholders, the experience of its human team, the sustained investment in the infrastructure of its terminals, as well as its ethical and social commitment with the stakeholders with which it interacts confirm the Organization's decided contribution to the country's competitiveness.



Port
companies



Port
operators



Logistics
services



Chartering
broker

Our services

- 1 Port company: As the owner of the port concessions, we provide our clients wharfage services, use of cargo facilities, use of operator and storage facilities in the area of public use.
- 2 Port operator: Loading, unloading, movements in port, consolidation and deconsolidation of containers and all actions to load.
- 3 Logistics services: Covered and uncovered storage, cargo stowage and unloading, international maritime transport, etc.
- 4 Chartering broker: Intermediary service between the shipping companies or shipowners and shippers (charterers) and end clients. Service provided through its affiliate Comship Brokers.

(102-2, 102-3, 102-4, 102-6)

Port operations are developed in its network of multipurpose ports, strategically located on both coasts, thus: two in Cartagena, one in Barranquilla, one in Tolú and two more in Buenaventura. The administrative headquarters are located in Bogotá.



**International port operation in Houston, Texas, the United States, through an operating agreement with Argos.*

COMPAS is the country's only network of multipurpose ports with six terminals in Colombia and an international operation in Houston, Texas, in the United States (the South Central Cement Terminal, belonging to Argos). It offers port and logistics services to businessmen who seek an ally for their logistics and foreign-trade operations. The Company was created on December 1, 2012 under the figure of a Stock Corporation.

(102-6)

COMPAS attends imports of food bulk, hydrocarbons, metallurgical products, steel, plaster, clinker, and slag, among others. Regarding exports, it primarily handles coal, coke, and cement, among others. Through its networks of port terminals, it connects routes to and from all of America, Europe and Asia. Among the customers are large wholesalers, marketers and distributors who supply their local markets. In 2018, it mobilized 6,757,444 tons through its entire port network, 8% more than the previous year, with a record of 614 motor vessels attended. Likewise, it reported 26% of Colombia's foreign trade in grains.

(102-5)

COMPAS is a stock corporation with its headquarters in Colombia. Its Shareholders are Southern Port Holding Inc. (conformed by the Echavarría Obregón family of Colombia and Grupo Ership of Spain) and West Street Infrastructure Partners III, an infrastructure investment fund, controlled and administered by the Goldman Sachs Commercial Banking Division. For more information on the shareholding structure and the structure of the Steering Committee, please see the chapter on Corporate Governance on page 66.

West Street Infrastructure Partners (WSIP) Port Holdings II Ltd.

An investment fund administered by the Goldman Sachs Commercial Banking Division

Southern Ports Holdings S. de R. L.

A company made up of the Echavarría Obregón family and Grupo Ership of Spain

Each of the majority Shareholders mentioned have a stake of nearly **50%** in the Company's shareholding structure.

(102-7)

The Organization's relevant figures (all figures are expressed in Colombian Pesos – COP)

Indicator	2017	2018
Total number of employees	334	372
Number of operations *	6	6
Net sales **	171,254,000,000	189,843,000,000
Total assets	1,078,134,000,000	1,157,496,000
Capitalization	1,078,134,000,000	1,157,496,000
Debt	572,951,000,000	670,192,000
Capital	505,183,000,000	487,304,000
Amount of products or services offered ***	Port company Port operator Logistics services Chartering broker	

* Port operations in Colombia

** Corresponding to operational income

*** See detail in indicator 102.2

(102-48)

The financial figures for total assets, capitalization and debt for 2017 that are published on page 15 of the 2017 report were revised and adjusted during 2018; that is why they present some changes compared to the data presented in these items in the previous report.

(102-12, 102-13)

Since 2016, the Organization has adhered to the United Nations Global Compact initiative and in 2017, it published its first Communication of Progress (COP), with which it not only undertakes to align its strategy and operations with the ten principles of the Global Compact, but it also reports its progress in each one of the four matters that make it up: Human Rights, Labor Standards, the Environment, and Anti-Corruption.

Likewise, **COMPAS** supports or is a member of some unions or initiatives, in which it actively and voluntarily participates. See the Index of GRI Contents. **COMPAS** does not make any additional contributions other than the membership fee to the entities and unions previously mentioned.

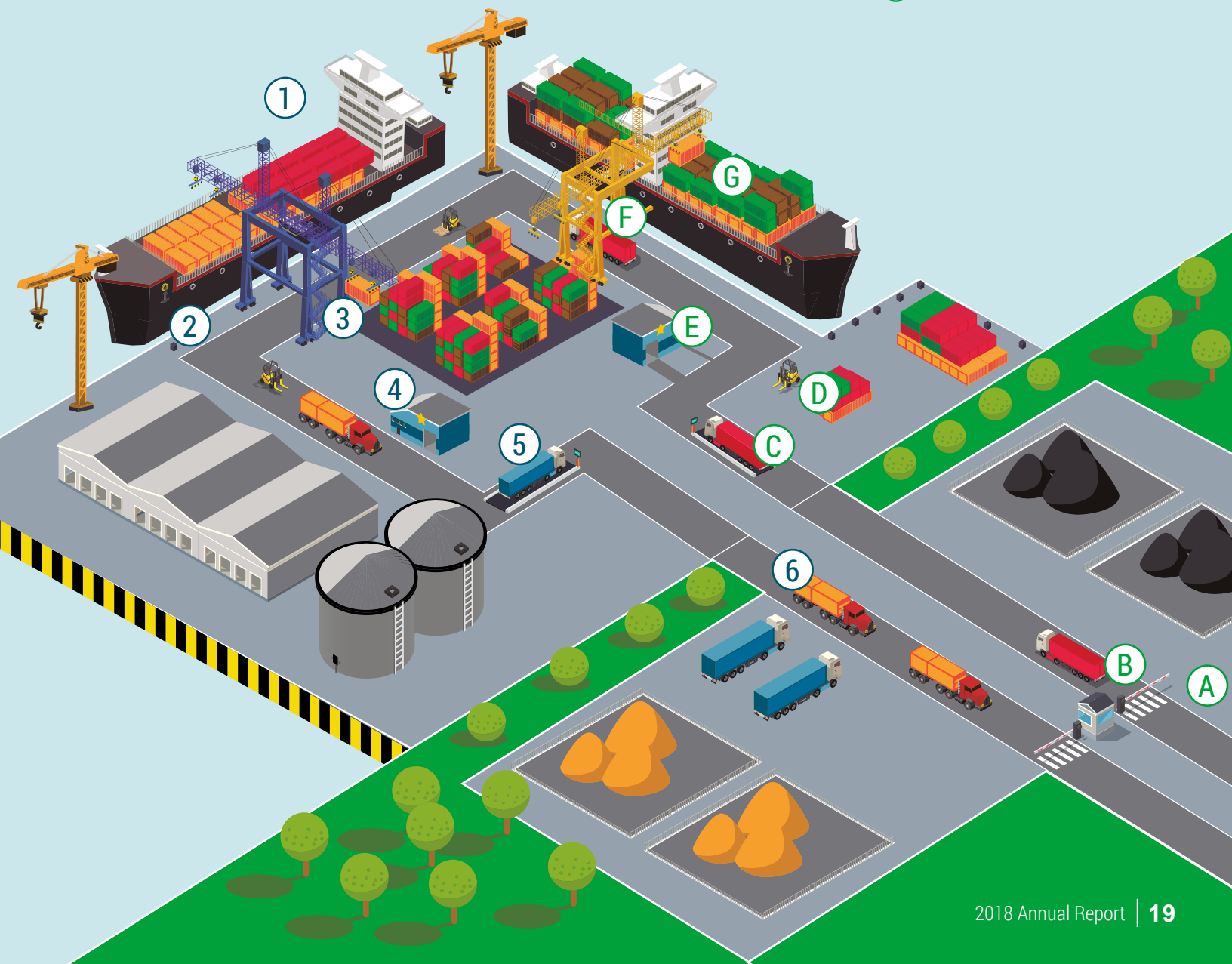
Import and export Process

IMPORT

- ① Announcement
- ② Berthing
- ③ Unloading
- ④ Customs process
- ⑤ Weighing
- ⑥ Merchandise exit

EXPORT

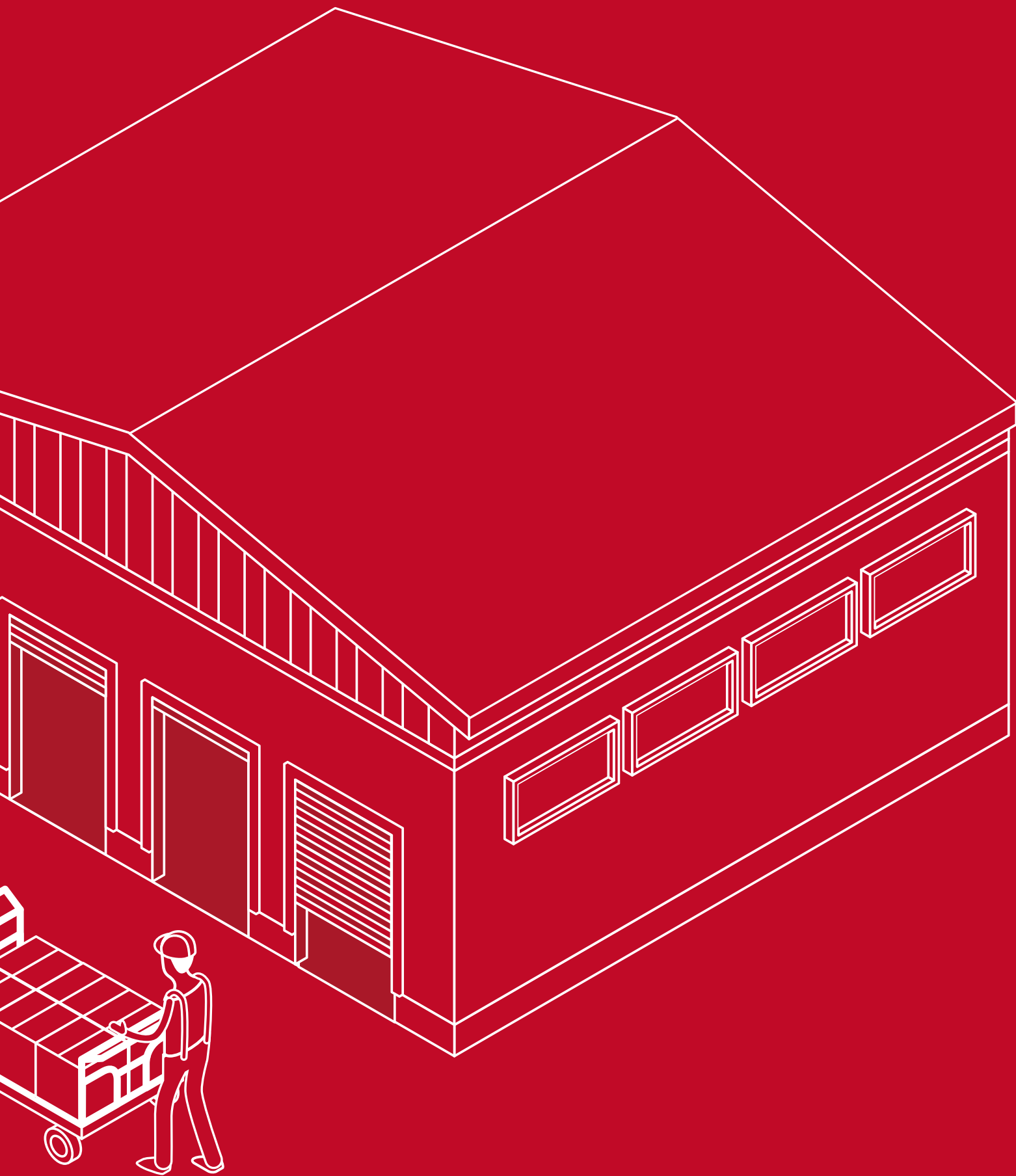
- Ⓐ Customs process
- Ⓑ Entry
- Ⓒ Weighing
- Ⓓ Unloading
- Ⓔ Inspection
- Ⓕ Loading
- Ⓖ Merchandise exit



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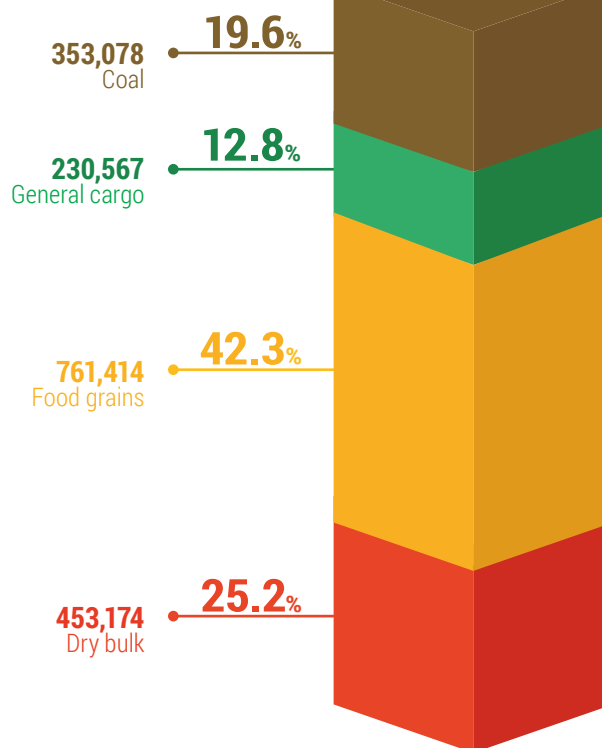
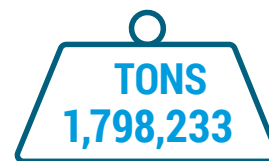
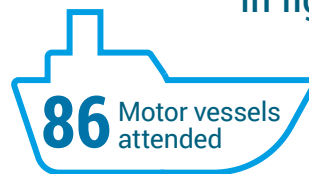
Our multipurpose network





The Aguadulce Terminal

In figures



(103-2)

In its second year of operation, the **COMPAS** Aguadulce Terminal continues to project itself as the best and largest multipurpose terminal in Buenaventura. This is shown by the volumes and variety of cargos handled last year, which is supported by the strengthening of commercial relations with current clients and the arrival of new clients and new cargos. For 2018, the port facilities met 91% of the cargo budget, mobilizing 1,798,233 tons.

For **COMPAS** Aguadulce, 2018 was a year of adjustments and improvements in equipment and personnel training to strengthen operations and achieve efficiency, safety and reliability in the attention to motor vessels, optimization of spaces to store products, as well as fast, safe dispatches in compliance with client requirements.

In the Area of Protection, during 2018 two maritime- and land-access controls were constructed, which allowed the terminal to obtain the Ship and Port Facilities Protection Certification (*Certificación Protección de Buques e Instalaciones Portuarias, PBIP*) for two years.

In the Area of Occupational Health and Safety, the implementation of the management system in this area was achieved, which allows measuring accident-prevention management and applies current regulations.

In Environmental matters, the change of all the luminaires to LED technology stands out; this constitutes a significant savings, thanks to the use of clean, environmentally friendly technology.

In terms of Infrastructure, Phase II of the mechanization to receive food bulks was completed, which allowed reaching speeds of up to 400 tons/hour to receive this type of cargo.

Additionally, a 5,000-m² storage area was constructed to receive and store cold steel with a capacity of 19,000 tons. This allowed increasing the number of ships served and the efficiency in the unloading of this type of cargo.



COMPAS received the **National Engineering Prize, awarded by the Colombian Society of Engineers (SCI)** for the modern infrastructure to handle grains and coal of this port terminal, located in Buenaventura.

(103-2)

2018 Milestones

- ✓ The start of the autonomous operation for general-cargo handling; this was previously executed by a contractor operator. This allowed expanding the coverage of service to clients, improving attention and surpassing the goals for this type of load, by moving 230,567 tons.
- ✓ The first berthing of the next-generation Pearl Island motor vessel, to unload the largest shipment of wheat that has arrived in Colombia: 58,000 tons, from Canada.
- ✓ The loading of the first large shipment of coal leaving the country through the port of Buenaventura, with a record figure of 74,851 tons of metallurgical coal bound for Japan.



(103-2)

Future challenges

Short-term goals – 0 to 2 years

- ★ Investment in the construction of covered spaces to store general cargo in the North Patio.
- ★ Unification of the COMPAS – Aguadulce Industrial Port Society (Sociedad Portuaria Industrial Aguadulce, SPIA), due to the requirement of the General Maritime Directorate (*Dirección General Marítima, DIMAR*).
- ★ Increase the capacity to capture, store and use rainwater to replace the needs of the terminal.

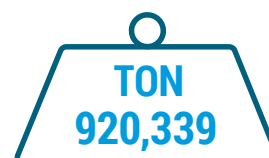
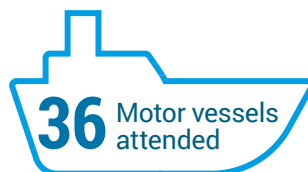
Medium-term goals – 3 to 5 years

- ★ Increase the storage capacity for food bulks by 20%, and by approximately 50% for coal.
- ★ Define and construct service areas for terminal users.



The Cascajal Terminal

In figures



(103-2)

The **COMPAS** Cascajal Terminal achieved its consolidation as one of the leaders in the import of food bulks in the Buenaventura port. It implemented the TERMEB mission system to manage inventories, with which all the **COMPAS** port facilities were standardized in this aspect.

With the initiation of storing grain in the warehouse previously used to store chemical bulks, the storage capacity of food bulks was increased 33%, equal to approximately 17,000 tons, with which we expect to meet the goals traced for the unloading of this type of cargo.

In March 2018, we received the YANGZE 8 motor vessel with 52,025 tons, which is the largest volume of cargo attended in the history of the terminal. In August of the same year, the **COMPAS** Cascajal Terminal celebrated nine years of successful continuous operation, with a cumulative total of 8,553,829 tons moved.

In the Area of Protection, during 2018, we maintained high safety standards, fully contributing to fulfilling the mission, while once again obtaining the Business Alliance for Secure Commerce (BASC) Certification for one year and also the third annual validation of the Ship and Port Facilities Protection (*Protección de los Buques y de las Instalaciones Portuarias, PBIP*) Code. Likewise, the Cascajal Terminal received continuous improvement, providing better and greater attention to clients, and the capital investment was approved for the comprehensive access-control project, which will be implemented in the second half of 2019, thus generating greater standards of control and safety.



We received the **YANGZE 8 motor vessel with 52,025 tons**, being the highest volume of cargo attended in the history of the terminal.

(103-2)

2018 Milestones

- ✓ The storage capacity of food bulks was increased by 33%, equal to approximately 17,000 tons.
- ✓ The goal of having 90% of the equipment available in perfect operating conditions to attend the motor vessels was surpassed, with an average during the year of 93% of equipment availability, thus ensuring the fluidity in operations.



(103-2)

Future challenges

Short-term goals – 0 to 2 years

- ★ Development of the comprehensive access-control project.
- ★ Installation of a new digital truck scale.
- ★ Maintenance of the roofs of the horizontal warehouses.
- ★ Having the TERMEB system information online of the amounts unloaded in the motor vessels.
- ★ Agreement with neighboring terminals to improve the tractor-trailer movement on external roads.

Medium-term goals – 3 to 5 years

- ★ Increase the storage capacity in Warehouse Number 5 (previously, the Statistical Quality Control, SQC).

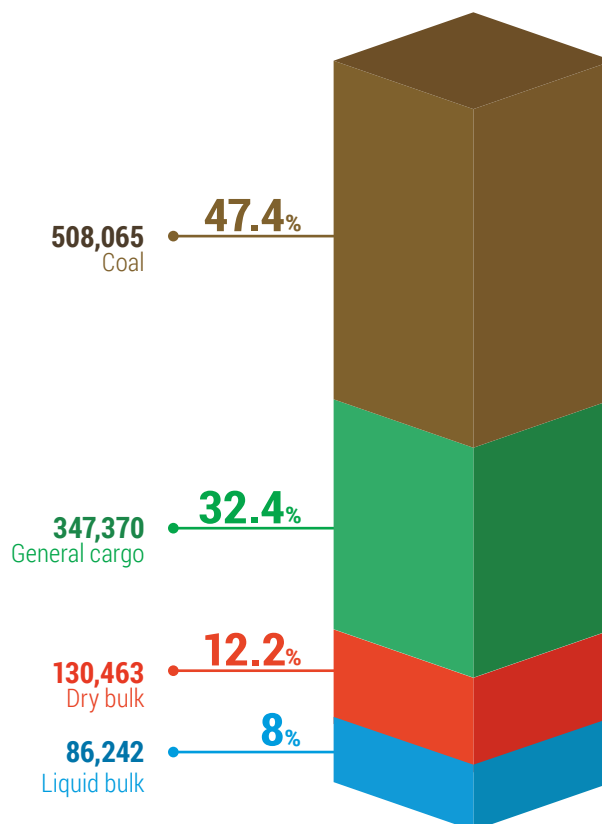
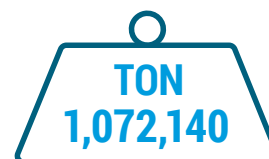
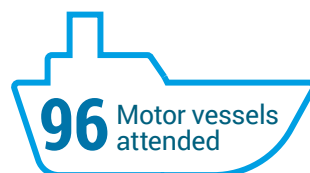
Long-term goals – more than 5 years

- ★ Increase the installed capacity and the unloading rate of motor vessels.



The Barraquilla Terminal

In figures



(103-2)

In 2018, the **COMPAS** Barranquilla Terminal was one of the leaders in the movement of coal for export in the city. It also consolidated its position in the mobilization of steel, by strengthening commercial alliances with importing clients.

We were able to increase participation in the general cargo operation by 56%, compared to the previous year, and we continue to diversify the portfolio of services as a multipurpose terminal.

In the Area of Protection, during 2018 we maintained high safety standards; we were re-certified in BASC for one year, as well as the Ship and Port Facilities Protection Certification (PBIP) for five years. In physical safety we invested more than COP 150,000,000, to generate higher control and safety standards to attend the more than 100,000 people who entered the terminal last year and there were no safety incidents during this period.

In the Area of Occupational Health and Safety, the terminal continued the trend to decrease accident indicators. In 2018, the rate had a 25% decrease compared to the year before, thanks to the control actions in the areas where there is the greatest occurrence of accidents, such as high-risk tasks, traffic and contractors.

In terms of Environmental Management, we achieved a 37% reduction in the generation of ordinary waste and 60% in hazardous waste. At the same time, the generation of usable waste was increased by 50%. The irrigation points for wetting roads as control measures of particulate material were increased. There were no environmental accidents for the reporting period.



In matters of environmental management, we achieved a **reduction in ordinary and hazardous waste**, while **increasing usable waste by 50%**.

(103-2)

2018 Milestones

- ✓ In terms of infrastructure, the adaptation of the dock line was finalized, being aligned in a length of 800 meters; this is equal to four berths, which will allow attention to all types of vessels admitted to reach the port of Barranquilla.
- ✓ Optimization of the general-cargo storage areas, managing to recover 2,500 m² of additional area.



(103-2)

Future challenges

Short-term goals – 0 to 2 years

- ★ Construction of covered spaces to store general and bulk cargo, becoming a multipurpose terminal to attend new markets.
- ★ Initiate operations in handling food bulks to diversify the portfolio offered to clients in the food sector.
- ★ Redesign of the coal-loading system to increase the loading rate.
- ★ Emphasis in client-service management to create synergies that permit loyalty with importers and exporters.

Medium-term goals – 3 to 5 years

- ★ Increase the number of scales in the terminal to decongest the internal vehicular flow and make the operation more efficient.

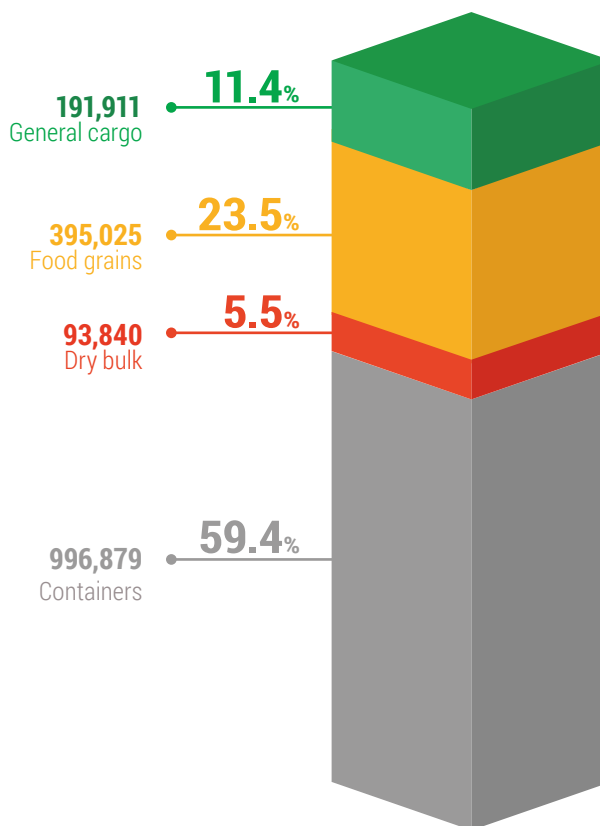
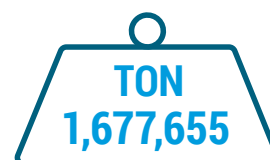
Long-term goals – more than 5 years

- ★ Equip silos to handle bulks, in order to strengthen the multipurpose condition of the terminal.



The Cartagena Terminal

In figures



(103-2)

In 2018, work was carried out to improve the efficiency of the port infrastructure, in order to increase the operational rates, occupational health and safety and environmental protection. Among others, noteworthy are:

- Maintenance and repaving of 4,000 m² of pavement in the terminal's operating area, to improve the operating and safety conditions of the equipment that move cargo inside.

- Maintenance and demarcation was done to 60% of the horizontal road signs, installed in both the operating and administrative areas, to improve road safety and mitigate the risks inherent to driving vehicles inside the terminal.
- Maintenance, change and recovery of lighting was carried out in the operating and administrative area, with circuit automation to improve electricity consumptions, as well as occupational health and safety.

Through daily courses with operative personnel and permanently through virtual training, the personnel entering the port were made aware of environmental preservation and conservation. Thus, the goal of zero environmental accidents in the terminal was achieved.

With the support of the National Police and the Harbor Master's Office, training and exercises were carried out aimed at improving the terminal's protection scheme and the training of security personnel. Likewise, the risks associated with crime were mitigated successfully, achieving the goal of zero protection events during the year.



In 2018 the **average operation time of the ships improved 10%**, compared to the previous year.

(103-2)

2018 Milestones

- ✓ The movement of clean bulks increased 2%, compared to 2017.
- ✓ Detailed care in the application of Company procedures was guaranteed to achieve safe, protected and clean operations, obtaining improvements in each one of these important aspects.



(103-2)

Future challenges

Short-term goals – 0 to 2 years

- ★ Continue with the legal and procedural management necessary to comprehensively consolidate the legal processes and requirements to begin the project to expand the terminal.
- ★ Optimize the results in each one of the interphases that are made with the ships that dock in the terminal, offering the best services to clients.

Medium-term goals – 3 to 5 years

- ★ Achieve the modernization of the terminal with the implementation of IP expansion works.

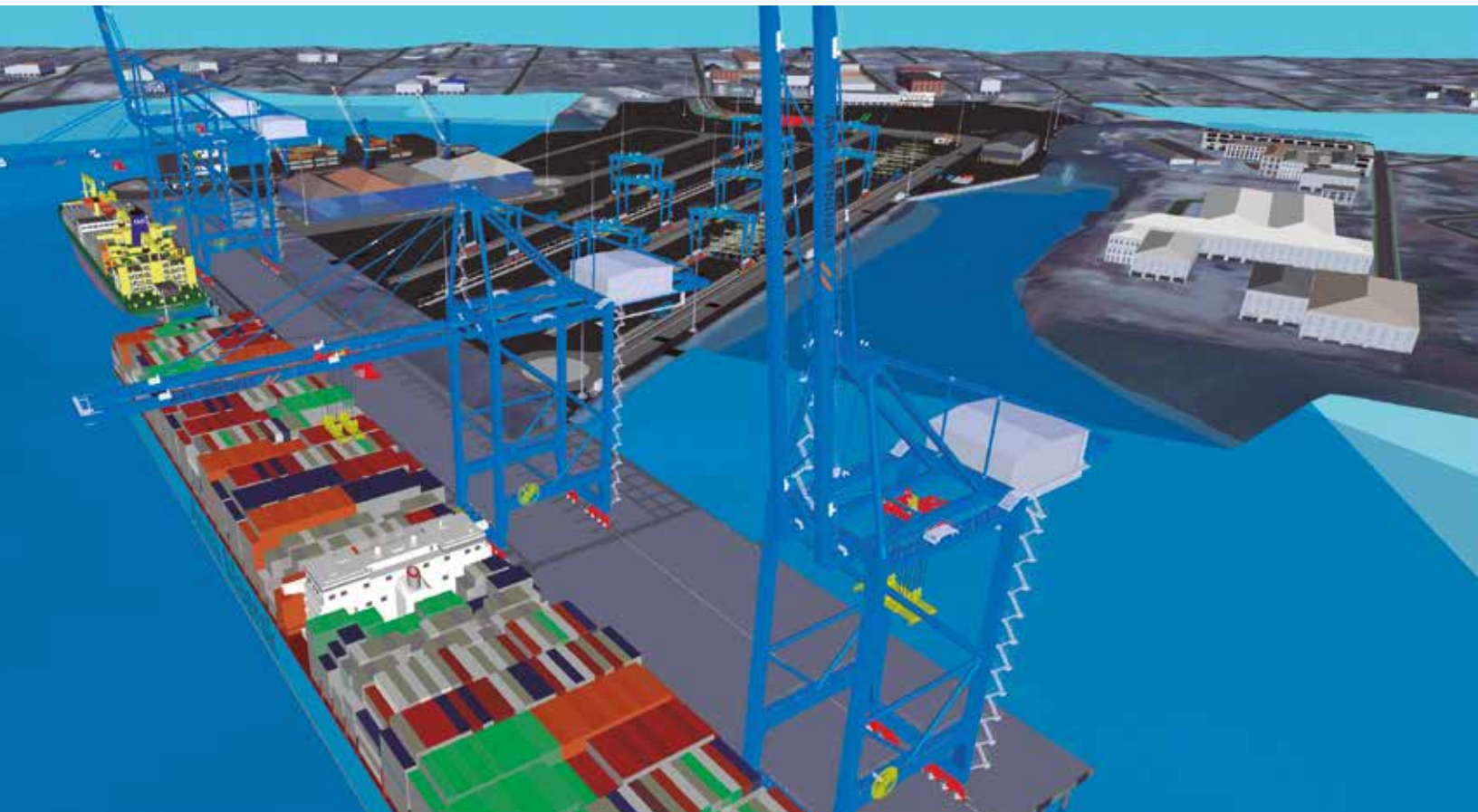
Long-term goals – more than 5 years

- ★ Increase the storage and cargo capacity of the terminal.





Infrastructure projects – Cartagena



In 2016, **COMPAS** signed an agreement with the company APM Terminals, one of the largest port operators in the world, in order to guarantee, improve and optimize the specialized handling of containers in its COMPAS Cartagena terminal. From that joint venture, the company Cartagena Container Terminal Operator (CCTO) was created, a port logistics operator for the specialized handling of containers and general cargo.

In this way, the infrastructure of the port facility will be expanded from two approaches: the first, modernizing and increasing storage capacity; the second, improving container efficiency and operation through equipment and modern yard and dock cranes. This will strengthen the Company's competitiveness, while improving the performance in the operation and attention of container ships. In addition, it leads to new business opportunities with shipping lines and logistics. The expansion of the terminal will favor the competitiveness of foreign trade and the country's logistics industry. All this will promote free competition in the city and contribute to the port vocation of Cartagena and the region.



The total investment of the project will be **USD 200 million**

The total investment of the project will be USD 200 million; USD 120 million will go to civil works and the remaining USD 80 million will be invested in the purchase of port equipment.

Principal Milestones of the Expansion Project

- 1 Geotechnical, oceanographic, bathymetry and topographic investigations were carried out with a state-of-the-art photogrammetry system in order to have more precise references and coordinates of the project, and, at the same time, generate a digital surface model.
- 2 Preparation of studies and designs at the infrastructure level.
- 3 Preparation of the Environmental Impact Study (Estudio de Impacto Ambiental, EIA) which took into account biotics, abiotics, air quality, environmental noise, geospheric components, oceanographic conditions, socioeconomic components in the area of influence of the project, and the evaluation of impacts and their measurements, and environmental-management plans and specifications.
- 4 Start of the process of prior consultation with the communities settled on Tierra Bomba Island, belonging to four towns of the island: Tierra Bomba, Punta Arena, Caño de Oro and Bocachica. The process is expected to end in the first half of 2019.



(103-2)

Future challenges

Short-term goals – 0 to 2 years

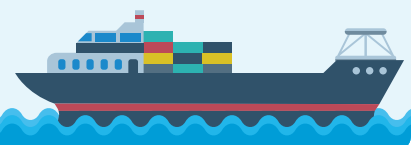
- ★ Finalize the prior-consultation process with the communities of Tierra Bomba, with a favorable concept from the Ministry of the Interior, which will permit the expansion project for the terminal.
- ★ If this milestone is met in the times stipulated, the bidding phase, in which the conditions and bidding documents are structured and adjusted, must be initiated. Also, the pre-qualifications of each one of the contractors authorized to present offers must be updated.
- ★ Contracting of the infrastructure works and new state-of-the-art operating equipment, to consolidate the start-up and operation in no more than five years, once the works have begun.

Medium-term goals – 3 to 5 years

- ★ Completion of the reinforcements of Docks 1 to 3 and the full construction of the new dock.
- ★ Adaptation of the new Claim Area.
- ★ Adaptation of the Specialized Container patios.

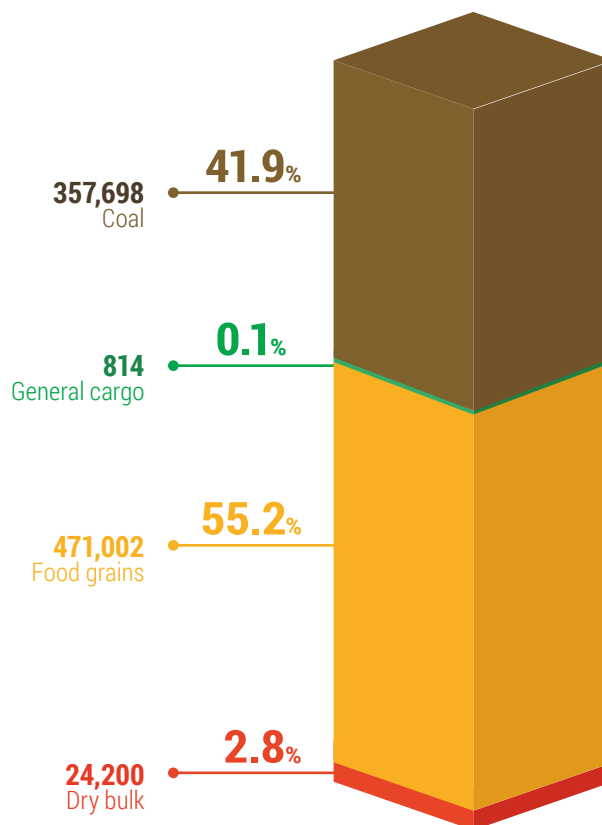
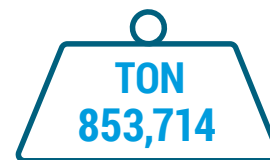
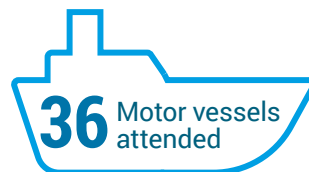
Long-term goals - more than 5 years

- ★ Completion of the expansion works, service networks and connection of new equipment.
- ★ Start-up and operation of state-of-the-art equipment (patio cranes, gantry cranes, racks, etc.)



The Tolú Terminal

In figures



(103-2)

The **COMPAS** Terminal in Tolú aims to be the multipurpose port of the region that contributes to its development, with a positive impact on the quality of life of the communities of influence. The fulfillment of the income budget during 2018 was 98.04%, highlighting that there were no work, loading, environmental or operation accidents.

During the year, the protection measures were consolidated with the transfer of the CCTV system and change of the supervisors of the surveillance company by our own supervisors. The ICONTEC (the Colombian Institute of Technical Standards and Certification) recertification audits of the ISO 9001:2015, ISO14001:2015, OHSAS 18001:2007, Protection of Ships and Port Facilities, (PBIP) and Business Alliance for Secure Commerce (BASC) were carried out with good results.

(103-2)

Milestones 2018

- ✓ Through Resolution 1339, dated September 11, 2018 the Environmental Authority (CARSUCRE) approved the Environmental Impact Study (Estudio de Impacto Ambiental, EIA) presented for the development of the expansion project of the dock. The contract was adjudicated to the firm Soletanche – Bachy Cimas for the design and construction of the dock expansion, as well as works to reinforce the current dock.
- ✓ In the Industrial Safety Area, the implementation of the automatic control system for emergency stops of the coal conveyor band and the installation of guards on the coal bands, and Bulk bands 3 and 4 were made.
- ✓ In the Operation Area, the modification on the unloading system of Band 14 and the modification of the programming of Receipt Scales 1 and 2 were made, to increase the rate of receipt of the product. The operational efficiency between the effective load rate versus the ideal load rate was 96%, taking into account that the budgeted goal was 95%.



The terminal **obtained the Environmental License in September 2018**, with which it is authorized to initiate the work of the expansion project in the First Quarter of 2019.



(103-2)

Future challenges

Short-term goals – 0 to 2 years

- ★ Execute the expansion project at the end of the second half of 2019.
- ★ Once the expansion project is completed with the new infrastructure, begin operations with other cargo (containers, live animals, vehicles) beginning in the first half of 2020.

Medium-term goals – 3 to 5 years

- ★ Negotiate a frequency for COMPAS Tolú with the shipping lines.

Long-term goals – more than 5 years

- ★ Consolidate the handling of containers and increase the frequency of the shipping lines.





The tolú expansion project



The geographic position of the COMPAS terminal in Tolú is strategic, given that there is currently no port terminal for general cargo or containers in the area of the Gulf of Morrosquillo. As it is the closest port facility to Panama, it becomes the best logistic solution for companies that have commercial interests with that country.

The expansion project responds to the needs and port demands of the region and expands port capacity with state-of-the-art port equipment placed at the service of foreign trade in Colombia. In addition, it contributes to strengthening the network of logistics services offered by COMPAS to its customers.

- With the expansion of the dock platform by 150m and the construction of a 265m viaduct, the terminal will have the opportunity to receive two vessels of 60,000 tons and up to 200m in length simultaneously. Likewise, other types of cargo may be taken care of.
- The current dock will be reinforced by a special system of high energy-dissipation defenses, which allows increasing the depth of the dock up to 13m.
- A depth of 13m and the extension of the platform will allow the terminal to receive larger ships, which is expected to increase the volume of cargo moved.

Likewise, during the construction phase about 40 direct jobs will be generated with the contractor in charge of the work; these positions will be occupied by people from the communities in the area of influence of the terminal. This consolidates **COMPAS** as one of the main sources of formal employment in the region, which contributes to the sustainable and integral development of the municipality of Santiago de Tolú.

For the development of the project, **COMPAS** will invest USD 20 million in infrastructure and USD 10 million more for the purchase of machinery and equipment.

To make this ambitious project a reality in 2019, important progress was made during the reporting period, such as obtaining the environmental license in September 2018 and the completion of the detailed designs delivered and approved by the National Infrastructure Agency (Agencia Nacional de Infraestructura, ANI), in October of last year.

Likewise, during 2017, **COMPAS** involved the communities in the analysis of impacts and the formulation of management measures based on the work to expand the terminal. With this involvement, it was possible to build the environmental impact study (EIA), in which the communities located in the smaller territorial units (area of direct influence), which includes the Palo Blanco sub-area, the village of El Palmar and the fishermen who have traditionally fished in the vicinity of the terminal, and the communities of the greater territorial units (area of indirect influence) which includes the remaining area of the municipality of Santiago de Tolú participated. The sectors participating in the EIA include communities, authorities, unions and local companies.

The main expectations raised by participants are related to social investment for the development of inclusive businesses and productive projects, generation of employment during the expansion and in the operation phase of the project and optimization of the operation to generate the least amount of environmental impacts in the environment.

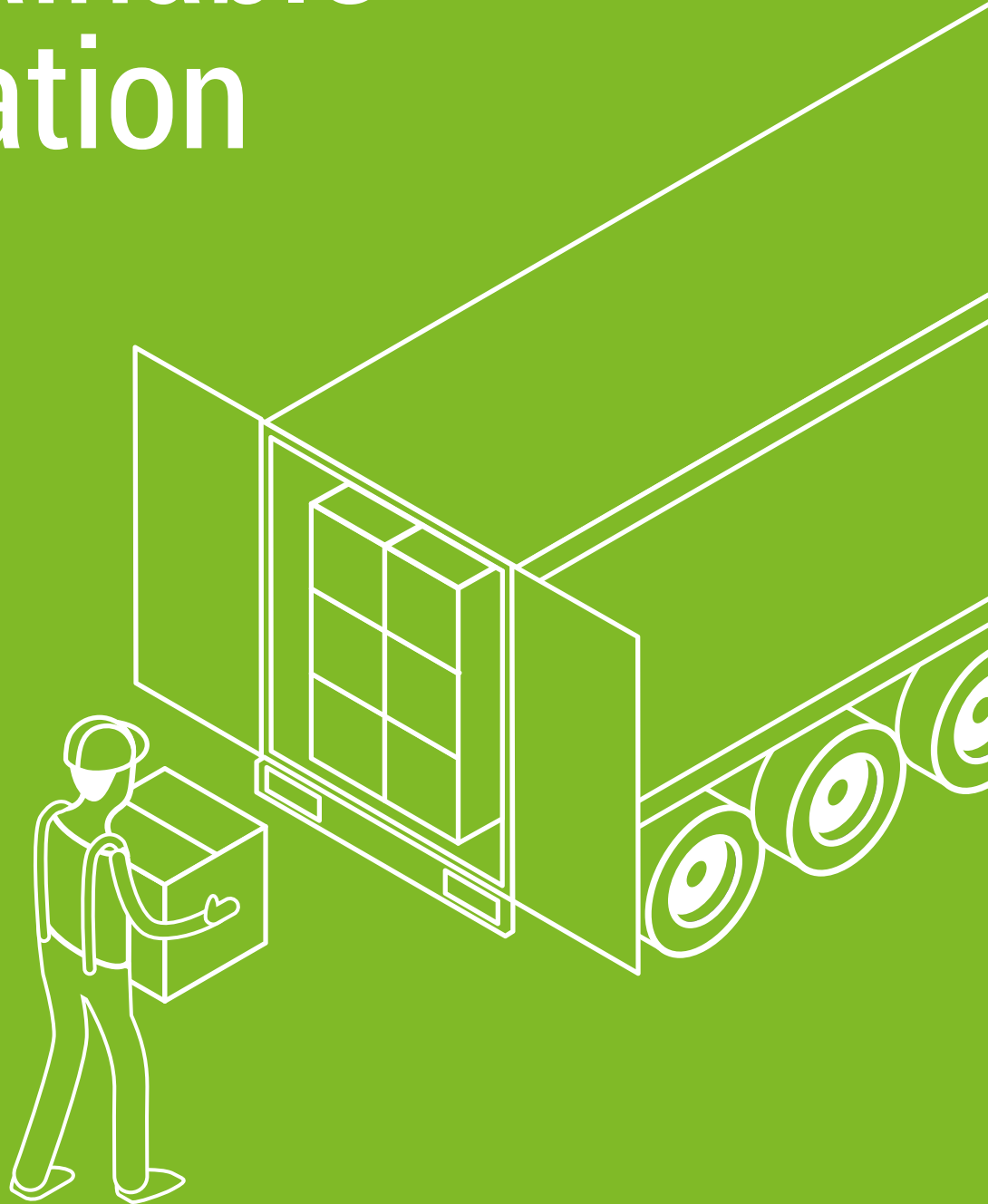
COMPAS expects to start work in the first quarter of 2019; once the construction phase has begun, the project is expected to be completed in six months.



With the expansion project, **the terminal will be able to receive two ships simultaneously** and attend other types of cargo.

5

Sustainable operation







The focus on sustainability

(102-46)

COMPAS performed the materiality analysis in 2018 as part of its commitment to update and revise its strategy every two years. This exercise was carried out following international guidelines, and taking into account the context of the sector and the Company. Its objective is to identify the strategic issues that will be prioritized and communicated in the next two years. The materiality exercise was based on the guidelines provided by the Global Reporting Initiative (GRI) and the best international practices, both standards and companies in the sector, were taken as reference.

The issues identified and analyzed take into account the impacts that these can have for the organization and for the stakeholders. Likewise, they respond to the information needs that the stakeholders have about the Company. In order to prioritize matters, consultations were held with the Shareholders and with the Company's Steering Committee and the issues were also rated according to the risks and strategic objectives of the business. All this resulted in the materiality matrix presented below.

(102-47)

Materiality 2019 -2020

Priority Issues

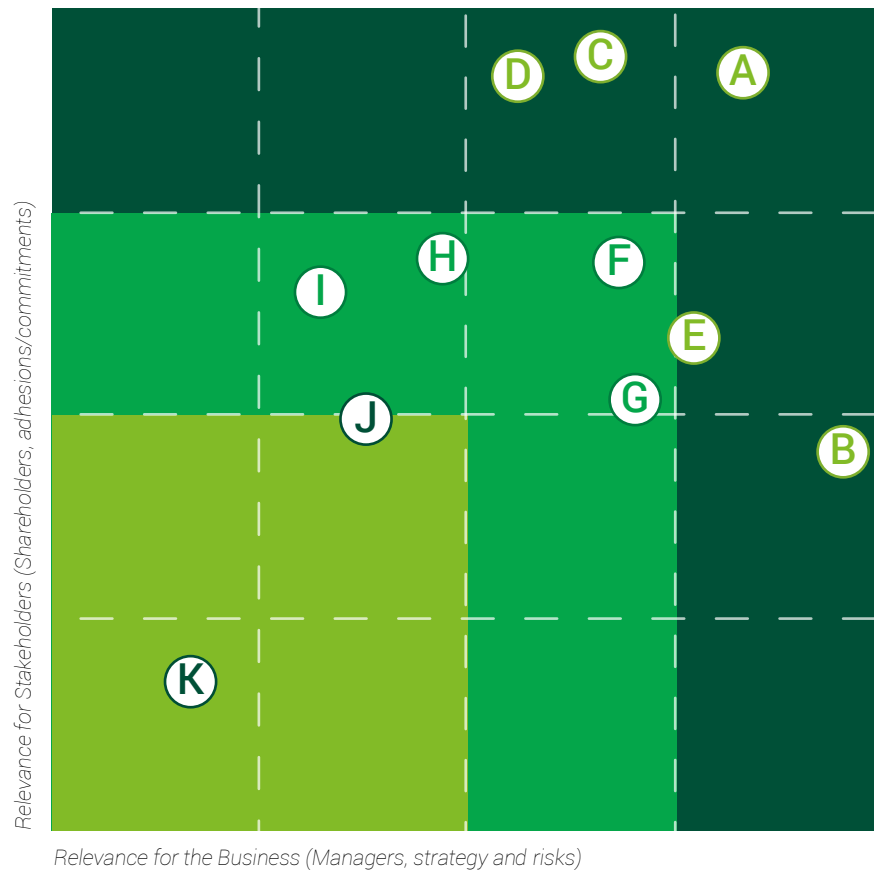
- A** Talent development and management
- B** Innovation for productivity
- C** Ethics, transparency and Corporate Governance
- D** Occupational health and safety
- E** Profitability and growth

Relevant Issues

- F** Risk management
- G** Comprehensive environmental management
- H** Cargo security and integrity
- I** Relations with clients

Emerging / Maintenance Issues

- J** Social management
- K** Supplier management





A Talent development and management

Both the operation as well as the management of logistics and port services require specialized human talent, which is necessary to attract, develop and retain. All this, by offering opportunities for personal and professional growth; a pleasant, productive work environment; as well as fair, equitable and transparent work practices.



B Innovation for productivity

In a context of expansions of the Company's facilities, there is an opportunity to optimize the operation by deploying new technologies and processes and digitizing administrative and commercial aspects. From innovation, sustainability challenges related to the proper handling of cargo and a better relationship with customers and strategic allies can be solved.



C Ethics, transparency and Corporate Governance

In a context of change in the shareholding structure, the Company must ensure an optimal transition in its corporate governance scheme and meet the expectations of the new shareholders. At the same time, it is necessary to maintain its mechanisms for regulatory compliance, risk management and ethical and transparent conduct.



D Occupational health and safety

In an operation that involves the handling of port equipment for the handling of heavy cargo, the occupational health and safety management system assumes a fundamental role to prevent and reduce the risks of accidents and fatalities of employees, contractors and visitors.



E Profitability and growth

The Company is in a growth process that includes the development of new projects, the increase of revenues, as well as the incorporation of new shareholders as of 2017. It is vital that this growth be managed in a responsible, efficient manner so as not to affect the Company's profitability and economic sustainability. At the same time, with the aim of continuing to grow, it is essential to manage challenges and opportunities linked to trends in the sector and international trade, especially, the problems of foreign trade and the generation of new businesses.



F Risk management

The risk management system that incorporates the governance system, identification and evaluation mechanisms and crisis management is essential to ensure the Company's adequate growth.

Stakeholders

(102-40) (102-42) (102-43) (102-44)

COMPAS conducts dialogues with stakeholders every two years, in which it addresses social, economic and environmental issues. Based on these consultations, carried out by the Communications and Sustainability Department – with the advice of an external consultant who is an expert on the subject – the expectations of the stakeholders in relation to the Organization's relevant matters are corroborated, as well as the mechanisms of permanent dialogue which the Organization has.

Based on the parties identified in the value chain, the Organization prioritized the stakeholders with whom it maintains and manages a permanent relationship.

See the Table of Stakeholders in the Annexes on page 122.



G Comprehensive environmental management

The Company must ensure comprehensive environmental management of the impacts of the facilities on the environment. In a context of expansion of the port facilities, a fundamental element is the design of infrastructures resilient to the effects of climate change and that enable the greatest possible eco-efficiency. Another fundamental aspect is the prevention of marine and atmospheric pollution.



I Relations with clients

The Company's commercial success depends largely on the satisfaction of its clients and the management of the relationship with them, focused on positioning COMPAS as the preferred logistics partner in their foreign trade operations.



H Cargo security and integrity

The infrastructure, processes and personnel deployed to guarantee the security and integrity of the cargo are essential for the Company's commercial success, given that they are fundamental aspects for its customers. In addition, there are risks associated with theft, cargo incidents and contamination, which represent a reputational and legal risk for the Company.



J Social management

The operation generates impacts and expectations in neighboring communities that need to be managed. This management is enabled by a community-relationship strategy adjusted to local realities.



K Supplier management

Supplier management has a relevant role because it seeks to align the third parties involved in the operation, in particular the port operators, so that they comply with the standards of conduct and operation required by the Organization. The articulation of initiatives and the development of capacities that allow generating long-term relationships are also relevant.



(103-2)

Future challenges

- ★ Communicate the results of the 2018 materiality exercise to the Board of Directors and establish strategies to strengthen the management of the defined issues.
- ★ Continue to strengthen the relationship mechanisms with the stakeholders to identify and manage their issues and expectations.
- ★ In 2020, update the materiality analysis in order to know in a timely manner the needs and expectations of the Organization's stakeholders not consulted in 2018.





► Centro Logístico Manzanillo - Cartagena

Risk Management

(103-1, 103-2)

The timely management of risks and the assurance of the effectiveness of the established controls is considered key to give reasonable assurance of the fulfillment of the objectives proposed and the continuous improvement of the management. This is why COMPAS has a Risk Management System as a tool for the identification, treatment and monitoring of the events to which the Company is exposed and could deviate it from the achievement of its strategic and operational objectives.

COMPAS' Risk Management System allows it to manage risks:

» **Strategic**

This is carried out, based on the study and analysis of key trends for the Company's sustainability. It is based on the Strategic Objectives.

» **Operative**

This is done from the analysis of COMPAS' mission processes, the characteristics and conditions of each of the terminals, as well the types of cargo.

» **Administrative**

This is carried out, based on the analysis of the other processes conducted in the Company to support the operation or the strategy.

» **Compliance**

This is related to the Risk Management System for Money Laundering, the Financing of Terrorism and the Proliferation of Weapons of Mass Destruction. The detail of this issue is addressed in the Chapter on Ethics, Transparency and Anti-Corruption.

» **Occupational Health and Safety**

This refers to the identification of hazards and the management of the risks inherent to the operation of maritime terminals in order to preserve the integrity and health of all persons involved in the operation. The detail of this issue is addressed in the Chapter on Occupational Health and Safety.

» **Protection**

This refers to the management of threats and vulnerabilities to assets, facilities, our own resources and those of clients, to ensure the security of the cargo. The detail of this issue is addressed in the Chapter on Cargo Security.

» **Environmental**

These risks are associated with the identification and evaluation of environmental aspects and impacts present in the Company's operation. The detail of this issue is addressed in the Chapter on Comprehensive Environmental Management.



The timely management of risks and the assurance of the effectiveness of the controls established **are key for the fulfillment of the Corporate Objectives.**

Strategic Risks

(102-15)

COMPAS' Strategic Risk Map contains nine risks that reflect the main threats identified by Top Management and that may further deviate from the achievement of the Company's objectives and, therefore, compliance with its strategy.



- Risks with high external interference
- Risks highly manageable by COMPAS

(103-3)

Likewise, with the purpose of incorporating risk management into the organizational culture, the declaration, commitments and guidelines for the administration of risks have been included in the Integrated Policy. In addition, there are internal evaluation mechanisms, such as the Audit Committee, which issue concepts about the integral risk system and the effectiveness of the controls or deficiencies found.

To strengthen the supervision and monitoring scheme, the Audit and Risk Committee approves the guidelines related to risk management and monitors the significant impacts.

(102-30)

Results

- ✓ The management for 2018 focused on strengthening operational control, for which transversal risks were identified in the operational processes that were analyzed and evaluated with respect to the conditions and characteristics of each terminal, thus directing the management towards the mitigation of the most significant risks while improving or maintaining the effectiveness of the current control structure.
- ✓ On the other hand, as part of the continuous improvement of the processes, the risk assessment methodology, as well as the effectiveness criteria of the controls, were refined, in such a way that the level of risk reflected the real criticality of the matters analyzed. In light of this update, the methodologies for Protection and Industrial Safety and Occupational Health (*Seguridad Industrial y Salud Ocupacional, SISO*) Risk Management were reviewed, as well as the management methodology of Environmental Aspects and Impacts. These methodologies are being adjusted in certain criteria to achieve their homologation with the corporate methodology and, thus, standardize the method.
- ✓ Additionally, **COMPAS** implemented software to support risk management, which has facilitated its availability for all employees, traceability and monitoring.
- ✓ It is important to mention that a methodology was established for the definition of a Business Continuity Plan by port facility and was implemented in a pilot project in the Barranquilla terminal. However, due to strategic decisions by the Company, the implementation in the other terminals was postponed.



102-31

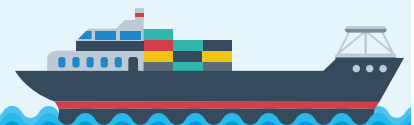
COMPAS has internal-evaluation mechanisms, as well as the Risk and Audit Committee, which emit concepts on the Integral Risk System and the effectiveness of the controls.



(103-2)

Future challenges

- ★ Execute the updating of the Strategic Risk Management cycle, through the execution of identification, analysis, treatment and monitoring processes.
- ★ Strengthen the risk culture through training at key levels of the Organization.
- ★ Expand the coverage of the updated methodology to administrative processes.
- ★ Train process owners in the risk software.
- ★ Continue with the homologation of risk methodologies.





► COMPAS Cartagena

Development and Management of Talent

(103-1) (103-2)

For **COMPAS**, its most valuable asset are the people who work in the Company; for this reason, the development and retention of human talent is one of its priorities. Having competent, committed human talent is a differentiating factor that allows the achievement of strategic objectives to the extent that each person contributes their best effort to exceed the expectations of stakeholders; developing their daily work in an efficient, careful manner; watching over their self-care, the safety of other people, the infrastructure and the cargo; while contributing to the Company's competitiveness and sustainability.

Human management is immersed in the Company's strategic planning expressed in one of the six Corporate Objectives as follows: Sustainably improve the welfare and development of employees, annually increasing the labor environment index until reaching a minimum of 81 in the methodology of a recognized entity in 2019.

To achieve this goal, the Talent Management strategy maintains five work fronts that have been defined since 2015:

Development of competent talent

The selection, development and retention of competent talent according to the requirements of each role to achieve the Company's plans and strategies.

The COMPAS culture

Develop an Organizational culture based on the Corporate Values to create value relationships with all the stakeholders.

**Development of integral leaders**

Orientation to competent, committed employee, who – through teamwork – contribute to obtaining the business results.

Development of effective teams

Improve the competence of teamwork by having a synchronized Organization that is related in an environment of trust and harmony to achieve the Organizational objectives.

Equitable labor relations

Promote equitable labor relations to improve employee commitment and satisfaction and develop a harmonious company/employee relationship.

Because the Company has identified human talent as one of the strategic risks, it is vital that the Human Management Area develop plans and controls to manage the risks associated with this issue.

During 2018, we worked on the following fronts:

Risk	Existing Controls
Lack of opportunity in the acquisition of personnel with the required skills, to cover vacancies	Publication of the vacancy in different public and private media and social networks where the Organization is registered
	Work of mouth, referrals from employees and acquaintances
	Expand the offer to surrounding areas
Non-fulfillment of the quota to generate direct and indirect jobs required in port concessions	Specialized training in conjunction with SENA and the Aguadulce Industrial Port Society (<i>Sociedad Puerto Industrial Aguadulce</i> , SPIA) for the communities of influence in Buenaventura
	Definition of the Organizational Chart and profiles in each stage of the operation.
Non-Compliance of the programs and scheduled of the Human Management Plan	Presentation of the Human Management plan to the Steering Committee for its approval
	Accompaniment by local managers in the execution of the plan
Non-achievement of employee professional and personal development	Identification and review of the gap between the profile of the position and that of the employee, in order to prepare a Development Plan.
	Execution of the Leadership Training Program
Non-compliance of labor obligations	Permanent updating for the process leaders on regulatory changes
	Permanent support and consultation with external labor advisors and fiscal auditing
	Internal audits to verify the integral compliance of labor obligations

(103-3)

Human management is an essential component of the Company's strategic planning. The Human Management processes integrate the Integral Management System, and cover the main areas of management in this area: personnel hiring, personnel administration, personnel induction and re-induction, education and training, change management. These procedures were reviewed and updated during the second semester of 2018, during which the dissemination phase began at the Cartagena, Barranquilla and Tolú terminals, which will be completed in 2019 with the Buenaventura terminal and the Bogotá headquarters.

To ensure the effectiveness of human management and the implementation of the Human Management Plan, the following controls are in place:

- ✓ Annual review of the Human Management Plan to 2019
- ✓ A detailed schedule of Human Management programs with programs and indicators for each work front
- ✓ Permanent space in the Steering Committee to monitor the Human Management Plan
- ✓ Monthly Primary Group and individual meetings with local managers to monitor the programs

(103-2)

The main results of Human Management in 2018 for the five work fronts that make up its strategy and medium-term challenges were the following:

Development of integral leaders: For the third year the *LIDERarte* program was executed with the participation of 49 leaders representing the Company's headquarters and all its areas, and work was carried out on the development of the first expected competition in "The **COMPAS** Leader: Gives Vision and Sense."

Development of competent talent: The format for the evaluation of performance up to the level of directors was standardized. Taking into account the Company's productivity and growth, the Board of Directors created the Executive Vice-Presidency with the objective of strengthening the logistics processes and responding to the needs and expectations of the national and international environment. The organizational structure of the Aguadulce Terminal was analyzed and redefined with the entry into operation of all its infrastructure, resulting in an increase of 48 people, of which 38 were hired during 2018 and the rest will be incorporated into the Company in 2019. The Maintenance Area was strengthened in the Barranquilla terminal with the creation of three additional positions, including the position of Maintenance Manager. Finally, the purchasing process was standardized and simplified.

Development of effective teams: Due to changes in the teams of terminal managers, no progress was made in the initiatives proposed for the development of effective teams; this work will be resumed in 2019 with activities aligned with the Company's strategy and training for teamwork.

The COMPAS culture: Through five workshops held in all the venues, the second version of the Code of Ethics and Conduct was published, incorporating topics such as control, fraud and corruption. Finally, the Internal Work Regulation was updated in Chapter VI – Work Schedule.

Relaciones laborales equitativas: The main welfare programs executed were the celebration of special events, the workshop for the formalization of employee housing, the visit of employees' children to the terminals, education and housing loans. Welfare initiatives contributed to an 8% decrease in employee turnover, compared to the previous year.

Additionally, among other relevant actions, the Internal Work Environment Measurement was carried out, which resulted in a work environment index of 76.6 in 2018, which represents an increase of 16.2 points in relation to the measurement made in 2016 in which an index of 60.4 was registered. The compliance goal was 76.1, which was exceeded and is consistent with the Corporate Objective of reaching an index 81 for 2019.

In December, the annual measurement of the satisfaction of the internal clients of the Human Management Area was carried out, in which the participants positively rated the management of the area with 80%; the expected goal was 85%. The integration of the Aguadulce Terminal into the culture and corporate programs that began in February is still in a process of transition and strengthening; for this reason, the indicator had this variation. With the continuity of the programs designed by the area, it is expected that the proposed goal will be complied with in 2019.

In 2018, only one complaint was filed with the Coexistence Committee, which was resolved. No complaints, disagreements and/or denouncements were filed through the other channels that the Company has for this purpose, such as the Ethics Committee (whose members were updated that year due to changes in structure, in accordance with the provisions in the Bylaws) and the Ethics Line (of which the launch was made, taking advantage of the updating and dissemination of the Code of Ethics and Conduct).

In December, the PQRS reception system for employees was finalized, which should start operating in the first two months of 2019.

Principal talent indicators

(202-2)

LOCAL DIRECTORS

From local communities



16
out of a total of **17**
in the **6** venues

(401-1)

New employee hirings and rotations

32 withdrawals
16 voluntary



59
Total hirings

(102-41)

Employees covered by COLLECTIVE BARGAINING



29

9%

(404-1, 412-2)

TRAINING

64%

received training in 2018



An average of
18.4
hours for men and women



Training in Human Rights

30 hours given to **208** employees
56% Total of the personnel

(406-1)

CASES OF DISCRIMINATION

NO

cases were presented in 2018



(102-8)

65.3%
Men

34.7%
Women

372
Employees

The total number of COMPAS employees includes SENA apprentices, university students and temporary workers

Indefinite period employment contracts
83.6%

(404-3)

PERFORMANCE EVALUATIONS

Employees whose performance and professional development were evaluated in 2018

30 employees out of 314
(total direct employees)

9.5% of personnel received the performance evaluation

(405-2)

SALARY RATIO Man/Woman

0.87
Management Managers

1.5
Specialist

1.2
Middle Managers

1.2
Operators

Does NOT apply

Executive
(There are no women in this level)

(401-2)

EMPLOYEE BENEFITS

Employees have **all mandatory social benefits**, as well as having the following extralegal benefits:



Life insurance, medical insurance, assistance for health, assistance for food, a vacation bonus, sponsorship to study, school kits, assistance for illness, educational assistance, assistance for notary public expenses and registration for the purchase of housing through a company loan, housing loan, a loan to study languages.

(103-2)

2018 Milestones

- ✓ Completion of the second part of the Continuing Education Course (Diplomado) in Port Management with the topic "Improvement of Legal Competitiveness; Project Management, Safety and the Handling of Hazardous Goods in the **COMPAS** ports." developed in partnership with the EAN University as part of the annual summons of the SENA Continuing Specialized Training Program. In November, 44 employees received their diploma.
- ✓ At the Cartagena Terminal, 21 employees graduated from the English course, thus reaching the level required for their position. Also training sessions in this language began for 14 people from the two terminals located in Buenaventura.
- ✓ The first part of the internalization of the Company's six Corporate Values was completed through the VALORarte Program.
- ✓ Strengthening of the ENSEÑarte virtual training tool, through which the induction and annual re-induction of all the Company's personnel is executed. The Corporate Values modules and the Code of Ethics and Conduct were included, as part of the internal induction and the presentation of the topics on Environmental Protection and Industrial Safety for Third Parties.



(103-2)

Future challenges

Short-term goals – 0 to 2 years

- ★ Develop the four competencies lacking in El Líder COMPAS.
- ★ Execution of 100% of the education and training plans actions defined.
- ★ Strengthen the Performance Management System up to the level of Directors.
- ★ VALORarte: The implementation of the second part of the program to continue internalizing the Corporate Values.

Medium-term goals – 3 to 5 years

- ★ Implementation of the Performance Management System for all Company employees.
- ★ The COMPAS Culture: Define and manage the cultural characteristics





► COMPAS Barranquilla

Occupational Health and Safety

(103-1) (103-2)

For **COMPAS** it is of vital importance to offer employees, both direct and contractors, safe, healthy work environments, preventing injuries and health deterioration related to the activities developed in each of their work centers, since the well-being of its employees – in addition to being a moral commitment – is a fundamental condition for the fulfillment of its strategic objectives. For this reason, the Company strives to continually improve the performance of the Occupational Health and Safety Management System (Seguridad y Salud en el Trabajo, SST).

In **COMPAS**, the Risk-Management strategy in SST focuses on an adequate identification of hazards and risks classified as high and extreme during the development of operations in order to control them in a consistent manner.

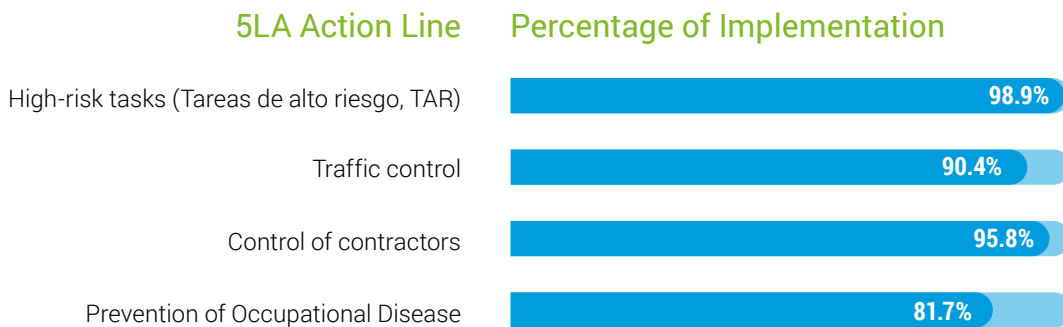
COMPAS maintains its Occupational Health and Safety Management System in compliance with national regulations and following the guidelines of the OHSAS 18001 standard. The risk evaluation and assessment process continues to be carried out in accordance with the guidelines included in the ISO 31000 standard "Risk Management Principles and Guidelines." As a result of the analysis of the 2018 risks, there is evidence of the need to concentrate efforts on strengthening control management over contractors, taking into account that this group is the main contributor to the accident rate of the organization, with 75% of the events.

The execution and continuous application of operational controls to the contractors (including induction of entry, inspections on the work areas, administrative and field audits, documentary review, high-risk tasks program), together with the spaces for periodic participation in Contractor meetings, allow the development of controlled activities that improve the safety conditions of the work environment.

In order to control the onset of occupational disease and continuing with the previous management, one of the lines of the Five Lines of Action (5LA) strategy continues, the activities for the control of the onset of the occupational disease are included in the Epidemiological Surveillance and Healthy Lifestyles Programs.

(103-2)

During 2018 the activities established in each of the lines of action of the 5LA Strategy continued, obtaining results that highlight the commitment to Occupational Safety and Health of each of the employees.



In relation to the Prevention of Occupational Disease Action line, the percentage of compliance was lower than that registered in the other lines, due to the fact that some activities were not carried out during 2018; however, they were reprogrammed to carry out during 2019.

The Company's accident rate presented a decrease of 4.7% with respect to the results of the year 2017, obtaining a rate of 2.06 for 2018, which indicates that for every 100 workers exposed, there are 2.06 events. In total, the Company recorded 40 events during the year. The management of the Tolú terminal and the Bogotá headquarters, which had no events, stand out. The Cartagena port facility registered the highest number of accidents with 16; Aguadulce terminal, 12 events; followed by Barranquilla with seven (7) and Cascajal with five (5).

The characterization and analysis of these accidents yielded relevant data to continue working on preventive measures focused on self-care and the identification of hazards and risks. In the case of contractors, the accident rate for 2018 with respect to 2017 showed a decrease from 1.7 in 2017 to 1.6 in 2018, taking into account that contractor personnel increased by 10.28% in the past year.

The reduction in the number of events during the period of the report was achieved due to the continuity in the 5LA Strategy, which prioritized the prevention activities in each terminal according to the requirements identified.

(103-3)

COMPAS monitors and evaluates its SST management through different mechanisms. For example, monthly the indicators of the Occupational Health and Safety Management System are analyzed and the results are presented to Management, the Steering Committee and the Board of Directors. A Program of Internal and External Audits is also implemented; the improvement opportunities resulting from the auditing process are managed through the Kawak Management Platform.

(403-1)

In **COMPAS**, the representation of employees in joint worker – health and safety Company Committees occurs at a level of 91% of the employees represented, where their work or place of work is subject to control by the Organization.

(103-2)

2018 Milestones

- ✓ Preparation of the Emergency and Disaster Risk Management Plan, with which the Company is aligned with the requirements of Decree 2157 of 2017.
- ✓ A 6% decrease in the 2018 accident rate of contractors compared to the previous year.



(103-2)

Future challenges

Short-term goals – 0 to 2 years

- ★ Maintain the Occupational Disease rate at zero (0).
- ★ Achieve an accident rate less than or equal to 2%.



Medium-term goals – 3 to 5 years

- ★ Update the Epidemiological Surveillance Manual
- ★ Evaluate the Operability of the Strategic Road Safety Plan

Long-term goals – more than 5 years

- ★ Renew the Fire Control System for maritime terminals.





► COMPAS Bogotá

comprehensive environmental management

(103-1) (103-2) (103-3)

In **COMPAS** environmental management is a fundamental element for the development of the business. It is immersed in the Company's integrated policy, from a responsible operation approach, best practices and the efficient use of resources. Based on this policy, the environmental objectives that the company is committed to comply with within its environmental culture are defined.

As a sign of our commitment in environmental matters, during 2018 in the different terminals, the efficient use of resources was promoted through awareness campaigns and staff training. Likewise, the migration of conventional lighting to LED lighting continued. In terms of waste management, the largest amount of usable waste was recovered and continuous work was carried out to reduce the generation of ordinary waste.

Given the environmental commitments that must be met, in its operation **COMPAS** directly involves minimization strategies and actions to improve the environmental impacts that may arise from its port activity.

COMPAS works towards a sustainable business, in which there is a synergy among three fundamental components: the economic, the social and the environmental. This is where environmental management becomes very important, as it seeks the necessary balance for a sustainable organization. In the search for this balance, in all its terminals the Organization once again achieved the ISO 14001 certification – International Standard of Environmental Management Systems (SGA) – which allows us to identify, prioritize and manage environmental risks.

The foregoing involves the identification of risks and opportunities in port facilities. Within the risks are possible affectations to the physicochemical characteristics of the ground; waters (surface, marine, underground) and affectations to the quality of the air. To manage them, the Company applies operational controls and specific projects according to the type of risk. As opportunities we have the value relationships that **COMPAS** has established with some stakeholders, which has allowed us to develop successful alliances for the management and use of waste, implement inclusive projects, hire local labor and strengthen the environmental culture in communities in the areas of influence.

COMPAS applies measures focused on the problem of climate change, particularly focused on the reduction of energy consumption, control and monitoring of emissions of gases generated by vehicles and port equipment, as well as control of particulate material in storage yards. In addition, monitoring of waste management is carried out, through audits of the suppliers responsible for the treatment and final disposal procedures, as well as the suppliers responsible for the treatment and final disposal of domestic effluents.

COMPAS involves legal compliance relevant to its environmental management through a matrix as a monitoring and evaluation tool, which is updated with each applicable standard that arises at the local, national or even international level.

(102-11)

COMPAS considers its precautionary principle through the implementation of its integrated policy, which sets out objectives focused on the prevention of environmental impacts that may become serious or that may cause irreversible damage to the environment. This policy is based on environmental legal compliance, the rational use of resources, use of waste and the implementation of a sustainable environmental culture.

(103-2)

Among the main results of environmental management in 2018 are:

- a) Quantification of the carbon footprint in each of the port terminals.
- b) Continuous training for all employees in waste management and separation and the efficient use of resources (water and energy).
- c) A 337% increase in the recovery of usable waste; a 9.5% decrease in the generation of solid waste; and a 38% decrease in the generation of hazardous waste resulting from the operation of the Cartagena port facility.
- d) A 525% increase in the recovery of wastes usable in **COMPAS** Aguadulce during 2018, compared to the previous year. The delivery of sweepings to a legally constituted foundation was established. Likewise, the increase in the operational volume of the terminal affected the generation of more waste; all this, together with the work of socialization of separation at the source, achieved a greater increase in its use.

- e) A 133% increase in recycled material compared to the previous year.
- f) Compliance with the parameters established in each integral solid-waste management plan and the formulation of the Integral Solid Waste Management Plan in the **COMPAS** Aguadulce port facility, under current legal guidelines.
- g) Compliance with the goal of 100% zero (0) accidents in all the terminals.
- h) Development of strategic relationships at the **COMPAS** Aguadulce terminal with foundations focused on environmental education, protection of natural resources and working with volunteers, resulting in the recovery of a sector of the beaches of *Punta Soldado* region of the Pacific, affected by the high presence of solid waste.
- i) We programmed and established 100% environmental monitoring in each of the environmental management plans of all port facilities.
- j) The 100% implementation of operational controls established according to the identification and evaluation of aspects and environmental impacts associated with each of the port facilities.

(103-3)

To ensure the effectiveness of its environmental management, **COMPAS** has the Environmental Management Department, responsible for implementing the corporate guidelines to ensure a more environmentally friendly operation. Likewise, in each of the Environmental Management Plans (*Planes de Manejo Ambiental*, PMA), legal tools are applied through which the relevant environmental authorities carry out periodic monitoring and from which the Environmental Compliance Reports (*Informes de Cumplimiento Ambiental*, ICA) are presented.

Each port facility has a matrix of environmental aspects and impacts and another of legal requirements, which include operational controls and monitoring of legal instruments, allowing **COMPAS** to identify improvement actions, as well as action plans under the framework of continuous improvement. In addition, reports are presented monthly (compliance with the environmental schedule), indicators of consumption of resources (water, energy, fuel, etc.) and the comparison of goals. In terms of monitoring, audits are carried out annually by the ICONTEC certifying body in the ISO 14001 standard.

The Company has the PQRS platform to have contact with suppliers and/or with external personnel who want to register petitions, complaints, claims and suggestions, in order to improve the service and take improvement actions for better organizational performance.

Management in 2018

The result of the monitoring and management carried out during 2018 is evident in the consolidation of the indicators of each of the environmental aspects relevant to the Company.

It is important to note that there was an increase in the movement of cargo in 2018 with respect to 2017; therefore, there was an increase in energy consumption and an increase in the generation of solid waste.

» Energy

(302-1)

Energy Consumption	Units	2016	2017	2018
Total internal energy consumption	GJ	47,122	58,226	67,394
Energy consumption from non-renewable sources	GJ	29,351	36,230	40,169
Energy purchased	GJ	17,771	21,996	27,225

(102-48)

The figures for internal energy consumption and renewable sources that are published in the 2017 report for the years 2016 and 2017 were revised and adjusted during 2018 and that is why they show some changes compared to the data presented in these indicators in the previous report.

The main increases in energy consumption in 2018 compared to 2017 were presented at the Cascajal and Aguadulce terminals. In the first case, the 21.5% increase was due to the fact that in 2018 a new mechanization line for handling bulk was put into operation at 100%. In the case of Aguadulce, the 501% increase was due to the fact that this port facility entered into full operation only in 2018.

» Water

(303-1)

Water Captured (m³)	Medida	2016	2017	2018
Total capture	m³	141,140	192,980	169,757
Fresh water captured from superficial sources		121,632	170,342	139,816
Subterranean water		621	187	460
Rainwater		Not available	Not available	4,366
Reused wastewater				0
Residual water from another organization				0
Municipal water supplies or other public or private water services (including tanker trucks)		18,887	19,493	25,115

(303-3)

Facilities with recirculation of water		2017	2018
Total number of facilities	Number of terminals	6	6
Total number of facilities with recirculation of water	Rainwater collection centers	2	2
Percentage of facilities with recycled water	%	33%	33%

Recycling and reuse of water (m³)	Measurement	2017	2018
Reused and/or recycles water	m³	2,958	4,366
Percentage of water reused and/or recycled	%	2	0.03

The variation in water consumption can be explained by the variation in the operation in each of the terminals. In the case of Tolú, it is evident that, due to the strong summer that occurred in the region and the increase in the volume of tons handled in the terminal, the irrigation of water for the storage of coal in courtyards had to be increased. To this situation is added the fact that the rainfall in the region is scarce, which is why there is a growth in water consumption in some months of the year.

On the other hand, in Cartagena there was a 30% increase in water consumption compared to 2017. This is due to the increase in the number of tons mobilized in 2018 and the increase in the plant personnel of the port operator operating in this installation. In the same way, several civil works were carried out that required the consumption of water.

In the case of Barranquilla, there was a decrease in water consumption, due to the reduction in the use of tanker cars; irrigation began to be carried out by means of new humidification points in the coal yard with lower consumption and with specific hours programmed for this activity.

» **Emissions**

During 2018 the first measurement of the footprint was made; therefore, there are no data from previous periods; 2018 is the base year and 2019 is a period to analyze the Company's performance in this matter.

(305-1) y (305-2)

Direct and indirect emissions (Ton CO2eq)	2018
Scope 1 emissions	3,117
Scope 2 emissions	1,937
Scope 1 and 2 emissions	5,055

» Waste

(306-2)

Waste management (tons)	2017	2018
Total waste generated by the Organization	1,777	2,334.5
Total hazardous waste by disposal method	41	18.5
Internal or external reuse	1.0	0
Incineration	16.0	14.8
Hazardous waste landfill	24.0	3.6
Total non-hazardous waste by disposal method	1,736	2,316
Internal or external reuse	119.5	-
Recycling	131.0	307
Composting	365.5	1,151
Landfill	1,120.0	858
Total waste disposed of (tons)	1,160	877

The effort made during 2018 in the integral management of waste is evidenced by a decrease in the material available and an increase in the usable material. This was achieved thanks to the specific actions applied in each of the port facilities.

In the case of Cartagena, the entry of a new supplier specialized in the recovery of usable material was arranged. In the same way, intensive training sessions were carried out with the personnel to consolidate the knowledge of separation at the source.

In **COMPAS** Aguadulce, a 521% increase was achieved in recyclable waste, through continuous campaigns for cleaning and recovering waste; the latter delivered to foundations and authorized entities. In the case of ordinary waste, there was an increase, due to the growth of the operation of the terminal and of the civil works corresponding to the final construction phase of the port facility.

Through a training process in the IP of Barranquilla, the management of waste separation was improved, through incentives for contractors operating inside the terminal, where the greatest flaw was detected in terms of segregation at the source. As a result, better management of ecological points was achieved and, consequently, an increase in recyclable waste.

» Biodiversity

During 2018, planting campaigns were carried out in the areas near the different port facilities and outside the city of Bogotá. The activity was aimed at celebrating Earth Day, bringing a message of environmental care and culture to the areas of influence and the **COMPAS** employees. The plantings of reported seedlings and trees do not correspond to forest compensation processes.

For more information on Comprehensive Environmental Management, see annexes on pages 142 to 149.

Under this monitoring system, the following milestones in environmental matters were achieved in each of the terminals:

Cartagena

- ✓ A 271% increase in the recovery of usable material.
- ✓ Total compliance with the maximum permissible values in the monitoring of seawater, air and noise.
- ✓ Training of 100% of the Brigade Staff to attend environmental emergencies.

Barranquilla

- ✓ A 37% decrease in the generation of ordinary waste.
- ✓ An increase in the irrigation points to moisten roads as measures to control particulate matter.
- ✓ A 128% increase in the use of waste.
- ✓ A 60% decrease in the generation of hazardous waste.

Tolú

- ✓ An 0.07% reduction in energy consumption, compared to 2017, which was also achieved thanks to talks on the efficient use of energy at an administrative level.

► COMPAS Cartagena



- ✓ An 80% change of the irrigation-system faucets, which had leaks, thus decreasing the unnecessary consumption of water.
- ✓ A 40% change of the artificial barrier, in order to have environmental compliance and decrease particulate matter in the surrounding areas.

Aguadulce

- ✓ A 34% use of the amount of solid waste generated, through delivery to local foundations specialized in the subject.
- ✓ One Hundred percent (100%) compliance with the permissible values established for the quality parameters of seawater, surface water, air and noise.
- ✓ Water supply to the operations and administrative buildings with the use of 10.54 m³/day of rainwater.
- ✓ LED lighting in 100% of the terminal.

Cascajal

- ✓ A 77% reduction in the generation of operation by-products (sweepings) between 2016 and 2018, going from 38,588 kg in 2016 to 8,721 kg in 2018. Improvements in mechanization have allowed minimizing waste during the passage of bulk food on the conveyor belt.

(307-1)

There were no significant fines for environmental non-compliance, taking into account the materiality criterion that corresponds to fines over COP 50,000,000.





► COMPAS Tolú

Understanding that – thanks to the management carried out to date – significant progress has been made and environmental challenges are increasing, COMPAS has defined short, medium and long-term goals that will allow it to continue moving towards the consolidation of a sustainable business model:



Cartagena

Short-term goals – 0 to 2 years

- ★ Reduce the generation of sweepings by 10%.
- ★ Build an organizational culture around the care of the environment, in line with the principles contemplated in Compas' Comprehensive Policy, with a focus on reducing the ecological footprint a better use of natural resources.
- ★ Build a Waste Collection Center and a Wastewater Treatment System

Medium-term goals – 3 to 5 years

- ★ Reduce the consumption of water and energy by 10%, taking into account the population and existing operation in the port facilities.
- ★ Implement a project where solar energy is used in the port facility to supply at least the administrative area.

Long-term goals – more than 5 years

- ★ Have an operation with the lowest possible environmental impact, implementing clean technologies



Barranquilla

Short-term goals – 0 to 2 years

- ★ Zero (0) incidents/environmental accidents.
- ★ Optimize the wastewater treatment system in the tire-washing area.

Medium-term goals – 3 to 5 years

- ★ Decrease the consumption of drinking water by up to 10% with optimization systems in restrooms.
- ★ Construct restrooms in areas with portable sanitary cabins.

Long-term goals – more than 5 years

- ★ Convert the facilities into an intelligent port, generating its own energy.
- ★ Convert the facilities into an intelligent port, with water-recirculation systems to use up to 40% of the resource.



Tolú

Short-term goals – 0 to 2 years

- ★ Optimize the bulk sand traps.
- ★ Reduce the generation of waste by 30%, compared to the previous year.

Medium-term goals – 3 to 5 years

- ★ Reduce water consumption by 10%, as a fulfillment of the Efficient Use and Water Saving Program.
- ★ Structuring of the tire-washing area, as a measure of air-quality mitigation.

Long-term goals – more than 5 years

- ★ Optimize the three sand traps to comply with the current parameters of regulations in force.



Aguadulce

Short-term goals – 0 to 2 years

- ★ Increase the capacity to capture, store and use rainwater to meet the needs of the terminal.
- ★ Design projects aimed at minimizing the environmental footprint and impacts generated by the operation.
- ★ Promote the culture of recycling, reuse and reduction of solid waste within the terminal and with stakeholders.
- ★ Execute civil works aimed at preventing and mitigating the environmental impacts derived from the coal operation.

Medium-term goals – 3 to 5 years

- ★ Formulate and implement cleaner production projects.
- ★ Strengthen the environmental contingency measures, generated by climate change.
- ★ Promote the recycling culture and increase the percentage of recycled material generated by 60%.

Long-term goals – more than 5 years

- ★ Implement projects aimed at using cleaner energies, minimizing costs and consumption of resources.



Cascajal

Short-term goals – 0 to 2 years

- ★ Optimize residual water-treatment systems.
- ★ Install artificial barriers in the critical points of the approach to avoid the leakage of particulate material.

Medium-term goals – 3 to 5 years

- ★ Support the environmental programs of the educational institutions of the Buenaventura district.
- ★ Empower the different contractor companies regarding the environmental management of their activities.

Long-term goals – more than 5 years

- ★ Be an environmental reference for port terminals.



► COMPAS Bogotá

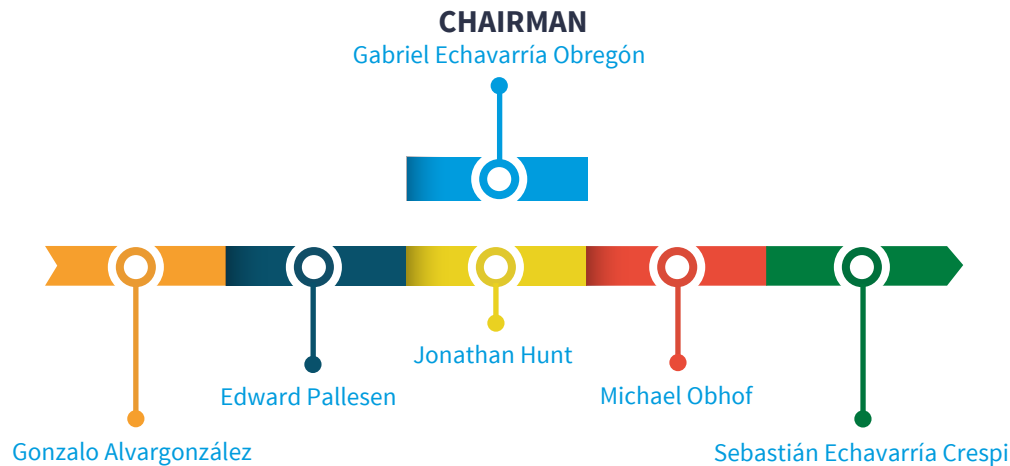
Corporate governance

(103-1) (103-2) (103-3)

COMPAS is committed to protecting the rights and interests of shareholders and stakeholders; for this reason, it has a corporate governance model aimed at continuously strengthening the administration; optimizing the decision-making process and ensuring ethical, transparent action in compliance with the legal regulations and applicable legislation. The Company has a structure and a governance framework that guides the correct administration of society.

(102-18, 102-22, 102-23)

The Board of Directors



The Shareholders' General Assembly

COMPAS has five shareholders, two of which are majority: West Street Infrastructure Partners (WSIP) Port Holdings II Ltd., an investment fund managed by the Goldman Sachs Business Banking Division; and Southern Ports Holdings S. de RL, a society formed by the Echavarría Obregón family and the Ership Group of Spain. Each of the aforementioned majority shareholders has a participation of close to 50% in the Company's shareholding structure.

The Board of Directors

The Company's Board of Directors is composed of six principal members, each with a Personal Alternate, elected for periods of two (2) years. Currently there are no independent members.

(102-24)

Election of the Board of Directors:

1. Three (3) members are designated and may be removed only by the Southern Ports Holdings S de R L.
2. Three (3) members are designated and may be removed only by the WSIP fund, managed by Goldman Sachs.

Each director has a Personal Alternate, designated in the same way as the principal directors. The directors are elected for periods of two years, or until their death, resignation or removal; they can also be re-elected indefinitely.

Each group has the exclusive right to remove and replace the directors it chooses. In addition, the Board of Directors shall appoint, from among its members, a Chairman of the Board, who shall convene the Board meeting, define the agenda, preside over the meetings, approve the budget assigned to the Board and other logistical and formal aspects. The term of the Chairman of the Board shall be three (3) years and he may be re-elected indefinitely.

The Bylaws provide for the election of an Independent Observer, who may have a voice, but not a vote, and will be elected unanimously by the Shareholders' General Assembly. The duration of the Independent Observer shall be two years and he may be re-elected indefinitely; likewise, he may be removed at any time by the unanimous decision of the Shareholders' General Assembly. To date, the Independent Observer has not been appointed.

The Board of Directors meets at least four (4) times a year, in meetings that may be face-to-face or not in person, making use of the alternatives provided by Colombian legislation. Its main mission is to lead the decision-making process that leads to the fulfillment of the Corporate Objectives, as well as monitor the strategic projects, looking after the interests of the Company's shareholders and other stakeholders.

The Board of Directors has the power to create the committees that it establishes to support it in the fulfillment of its functions. In 2018, the Board of Directors decided to maintain the Audit and Finance Committee, and approved a new revised version of its regulations. With regard to the Operating Committee, the Board of Directors did not consider it necessary to conform it during the period of the report, bearing in mind that the Board has met frequently.

Handling Conflicts of Interest

(102-25)

Unless expressly authorized by the Shareholders' General Assembly, both Directors and Administrators must abstain from participating in activities that involve competition with the Company or in acts in respect of which there exists a conflict of interest, which includes both direct participation as well as participation by interposed people. The Bylaws provide that the members of the Board of Directors – and, in general, the Company's Directors – must inform the Shareholders of the conflicts of interest in which they are or may be involved. The Board of Directors will give the Shareholders' General Assembly all the information that is relevant to make a decision. The vote of the Administrator or Director should be excluded from the respective determination, if he is a shareholder. In any case, the authorization of the Shareholder's General Assembly may only be granted when the act does not harm the Company's interests.

Delegation of Authority

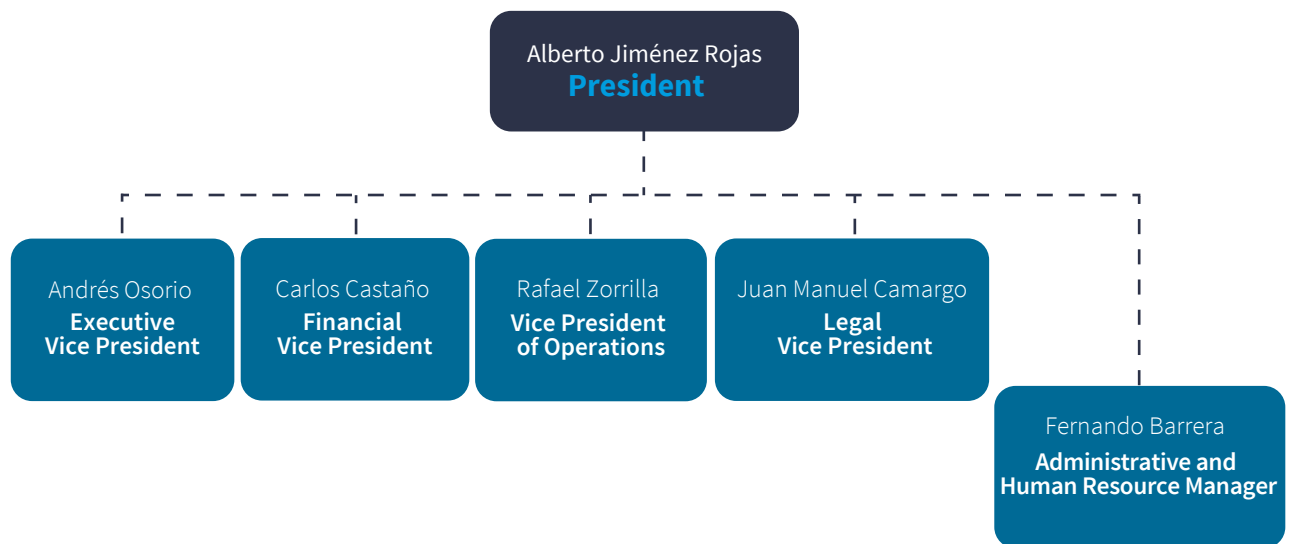
(102-19, 102-20)

In exercising its functions, the Board of Directors is responsible for examining and determining the delegation of authority on economic, environmental and social issues to senior executives and other employees that it considers appropriate and pertinent. The Board of Directors delegates its authority to the President and the Steering Committee through the decisions made at the meetings held by this governing body. These decisions are reflected in the Minutes of the Meeting, which serve as support for the provisions adopted by the Board.

The Steering Committee

The Steering Committee is made up of the Presidency, the Vice Presidencies and the Administrative and Human Resource Management, which reports directly to the Presidency. Its main mission is to ensure that the Company's administration is carried out in accordance with the guidelines of the Board of Directors and the Presidency, to monitor the performance of the Organization and the development of strategic projects, analyze the evolution of the business and evaluate new projects .

The Steering Committee meets periodically or when the Company's needs so require, by summons of the Company's Presidency.



(102-21, 102-29, 102-30, 102-31)

The Steering Committee provides accountability to the Board of Directors periodically, on the issues delegated by this governing body. All inquiries made by the community, suppliers, clients and other stakeholders to the Company are analyzed in principle by the Vice President or Manager of the respective area, who analyzes the request or consultation and, if necessary, it is presented to the Presidency. If deemed necessary, the Presidency reports it directly to the Board of Directors, so that the Board may analyze the scenario and give instructions on the case. The Steering Committee carries out the identification of economic, social and environmental issues and their impacts, risks and opportunities once a year and evaluates these issues three times a year or whenever necessary.

The Financial Vice Presidency reports directly to the Board of Directors on the relevant issues for the fulfillment of the Company's objectives. In addition, environmental and social functions are the responsibility of the following areas within the company:

- » Directorate of Environmental Management
- » Directorate of Communications and Sustainability

(102-26)

During 2018, the strategy was reviewed by the Steering Committee and the Directorate of Communications and Sustainability for the period 2018 – 2022, where the following topics were addressed: Mission, Vision, Objectives and Strategic Projects, Strategic Risks and the alignment of the strategy with the Corporate Objectives. The results of this review are expected to be communicated as of the first quarter of 2019.

The Steering Committee also analyzed the number of audits carried out during the year to optimize the time and resources invested in these audits, going from six (6) internal audits per terminal per year, to a comprehensive audit. This seeks to simplify the execution, methodology and monitoring of the Company's processes.

In addition, the governance structure of Risk Management was updated, the risk matrices of each port were updated and the risks and controls were assessed. The validation clarified the risks in which it is necessary to concentrate, in ensuring their mitigation or control and the importance of measuring it in a more accurate way. To learn more about risk management, see the Chapter on Risk Management on page 42.

The Legal Vice-Presidency achieved the merger by absorption of the companies *COMPAÑÍA DE PUERTOS ASOCIADOS S. A.* and *BOSCOAL OPERADORES PORTUARIOS S. A. S.*, which was formally registered on October 30, 2018.

The approval of the Public Logistic Support Depot of the Barranquilla and Tolú terminals to the International Logistics Distribution Center was also achieved, which, for clients, means greater permanence of the merchandise in the national territory. Thus, the merchandise may be subjected to different operations, such as conservation, handling, packaging, re-packaging, among other benefits. This process began during 2017 and ended in 2018.



(103-2)

Future Challenges

Medium-term goals – 3 to 5 years

- ★ Preparation and approval of a strategic plan for the Company that covers a period equal to or greater than two (2) years, by the highest Corporate body or the highest Administrative body.
- ★ The Board or Directors, or the equivalent body, shall define the short-term (annual), medium-term (two years) and long-term (five years) strategy, through the annual budget, the Strategic Plan and the Strategic Objectives.
- ★ The highest Corporate body or the highest Administrative body shall define strategic objectives, the fulfillment of which must be given in a minimum period of five (5) years.







► Centro Logístico Manzanillo - Cartagena

Ethics, transparency and anti-corruption

(103-1) (103-2)

COMPAS maintains its firm commitment to ethics, transparency and anti-corruption, which it strengthens through the permanent review of guidelines and directives immersed in its Corporate Governance and strategic definitions embodied in a more concrete manner in the Code of Ethics and Conduct, Corporate Values and the Company's Integrated Policy.

(102-16)



Within the strategic guidelines of the Company, the Vision establishes the provision of innovative and quality logistics services as one of the factors for compliance. For this, it is essential to have processes focused on sustainability, ethics, transparency and the fight against corruption, expanding commitment and building trust with all stakeholders. This allows us to develop a favorable opinion capital and reach the desired leadership position in the sector, based on the credibility and integrity of the daily actions. This, without a doubt, makes a difference in sectors such as infrastructure and services that may be prone to corruption.

For employees, the management of ethics, transparency and anti-corruption constitutes the framework of appropriate conduct in their daily actions in order to do the right thing, act responsibly and transparently. Involving suppliers, strategic allies, clients,, communities and shareholders in the commitment to ethics, transparency and anti-corruption also allows the Organization to mitigate the risks associated with these issues.

(102-16)

The Code of Ethics and Conduct and the Integrated Policy contain statements to be taken into account to comply not only with the regulatory standards in these matters, but additional measures that permanently guide the ethical and transparent behavior of stakeholders. This is how the Code of Ethics and Conduct specifically establishes contractual requirements for the supply chain, the consequences for non-compliance and the audit mechanisms. In turn, it establishes the responsibility of the Organization's employees in the compliance with the laws and regulations in force in the development of the business.

(102-17)

Additionally, the Code addresses the Self-Control and Risk Management System for Money Laundering and the Financing of Terrorism (*Sistema de Autocontrol y Gestión del Riesgo de Lavado de Activos y Financiación del Terrorismo*, SARLAFT) where the Company is committed to the fight against Money Laundering and the Financing of Terrorism (ML/FT), and rejects any criminal activity or conduct in that matter. In this sense, all business, contracts and operations are in accordance with the policies and procedures set forth in the SARLAFT manual and other regulations that regulate ML/FT risk sources.

With regard to business relationships with suppliers and clients, **COMPAS** establishes high standards of quality and service, as well as ethical principles that ensure transparency and honesty for mutual benefit.

The Code of Ethics and Conduct can be consulted on the website www.compas.com.co in the section Nosotros, Section Ethics and Values.

(205-2) (205-3)

During 2018 the Ethics Committee did not receive any report or complaint. In this same period, the content of the second version of the Code of Ethics and Conduct was updated and disseminated to 100% of the employees through five recreational workshops, where all employees updated the declaration format of possible conflicts of interest. In the workshops, special emphasis was placed on issues such as the control environment, fraud, sustainability, social management, environmental field and information security.

(102-17)

The Ethics Line was launched as a whistleblower channel, through which any person or Company employee can make their complaints or reports of situations that are lacking in the ethics and transparency of the Organization.

In case of concerns about the understanding or implementation of the policies enunciated in the Code of Ethics and Conduct, clarification may be requested from the following collaborators: the Manager or Vice President of any area, or members of the Organization's Ethics Committee. If you have any situation to report and you are not sure, or you do not have clarity of the ethical nature of the behavior, you can contact the Ethics Line (lineaetica@compas.com.co), where you will receive the corresponding guidance to address the case.



Contact the Ethics Line
directly through Email:
lineaetica@compas.com.co

The Ethics Line can be accessed directly through Email:
lineaetica@compas.com.co.

Due to changes in the Company's structure, the members of the Ethics Committee were updated, consisting of the Presidency, the Executive Vice-Presidency, the Vice Presidency of Operations, the Legal Vice-Presidency and the Management and Human Resource Manager, who – in the last meeting – reviewed the possible conflicts of interest declared by the employees.

Also, during 2018 the Company developed activities through the VALORarte Program, to promote the internalization of the six Corporate Values: integrity, respect, teamwork, quality, innovation and agility, fundamental pillars for ethical action by all employees .

In accordance with the goals set, in 2018 the SARLAFT matrix was updated, based on the new Corporate Risk methodology. Likewise, the risk of proliferation of weapons of mass destruction was included in the scope of the SARLAFT system and the SARLAFT manual was updated.

**(103-3)**

► COMPAS Tolú

As internal mechanisms to manage ethics, transparency and anti-corruption, **COMPAS** has:

- » The incorporation of issues associated with ethics in updating and reviewing the Company's strategic guidelines.
- » Internal and external audits where the compliance and commitment of each process in this aspect is reviewed.

**(103-2)**

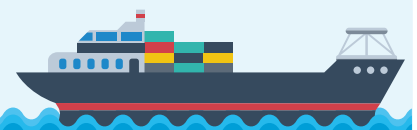
Future Challenges

Short-term goals – 0 to 2 years

- ★ In the general induction to the entry of a person to the Company and the annual re-induction, include the virtual modules of VALORarte and Code of Ethics and Conduct as obligatory subjects.
- ★ Strengthen a work environment that promotes ethics, transparency and anti-corruption, integrating different systems for the prevention and detection of actions contrary to the law and the guidelines, policies and internal rules.

Long-term goals – more than 5 years

- ★ Build an organizational culture based on transparency and the application of the ethical principles defined by the Organization that promote the responsible behavior of all Company employees, regardless of their hierarchical level.
- ★ Achieve a commitment and compliance with the Organization's ethical guidelines by the supply chain, strategic allies and clients.





► Barranquilla fishermen

Social management

(103-1) (103-2)

For **COMPAS**, Social Management is important because through it the inclusion and socioeconomic development of the inhabitants and grassroots social organizations in the areas of influence of the terminals in operation is promoted. Through the Communications and Sustainability Directorate, social work is articulated, which has the synergies of the Organization's staff in the terminals, social operators, allies and support entities. **COMPAS** identifies the expectations and needs of the communities, including the needs of existing vulnerable groups, through characterizations and censuses, follow-up meetings, PQRS attention, materiality dialogues and direct contact with social leaders and other neighbors of the terminals .

COMPAS' social investment framework in Colombia includes the following actions:

Cartagena:

Bosque, Manzanillo and Zapatero (Fishermen)

Findings of the characterization:

- ✓ High poverty income.
- ✓ Low level of higher education.
- ✓ Services in public roads and high social risks.
- ✓ Poor articulation of the entities for citizen participation.
- ✓ Difficulties of mobility for entry to the port.

Intervention Programs, Projects and Actions:

- E** Education: Courses; Technical and Technological Careers (SENA); the *Vivo PRAES* Project.
- O** Fenix Project: Community Strengthening and Governance.
- O** Community infrastructure.

Tolú:

El Palmar, Palo Blanco and Pescadores

Findings of the characterization:

- ✓ Young population (49% of the population is between 0 and 30 years old).
- ✓ Higher education in the rural areas is low (6%).
- ✓ Little knowledge of the Red Unidos programs.
- ✓ Low family economic income.
- ✓ Poor public-utilities infrastructure.

Intervention Programs, Projects and Actions:

- NI** Inclusive businesses: 9 business units.
- E** Education: the *Verde Vivo PRAES* Project.
- NI** Sustainable Agriculture Project.
- A** The Diaspora Program to plant artificial reefs.

Buenaventura:

Six Community Councils of the Black Communities (*Consejos Comunitarios de las Comunidades Negras, CCCN*) near the COMPAS Aguadulce terminal

Findings of the characterization:

- ✓ Unsatisfied Basic Necessities (*Necesidades Básicas Insatisfechas, NBI*) of 60% (high poverty).
- ✓ Activities: Mining, fishing, logging, agriculture, collection and sale of river material and service (tourism, restaurants, transportation, etc.).
- ✓ Poor community infrastructure and services.

Intervention Programs, Projects and Actions:

- E** School education program, in trades and university education.
- NI** Inclusive businesses
- NI** Sustainable Agriculture Project
- O** Health Days (*Jornadas de Salud*)

Barranquilla:

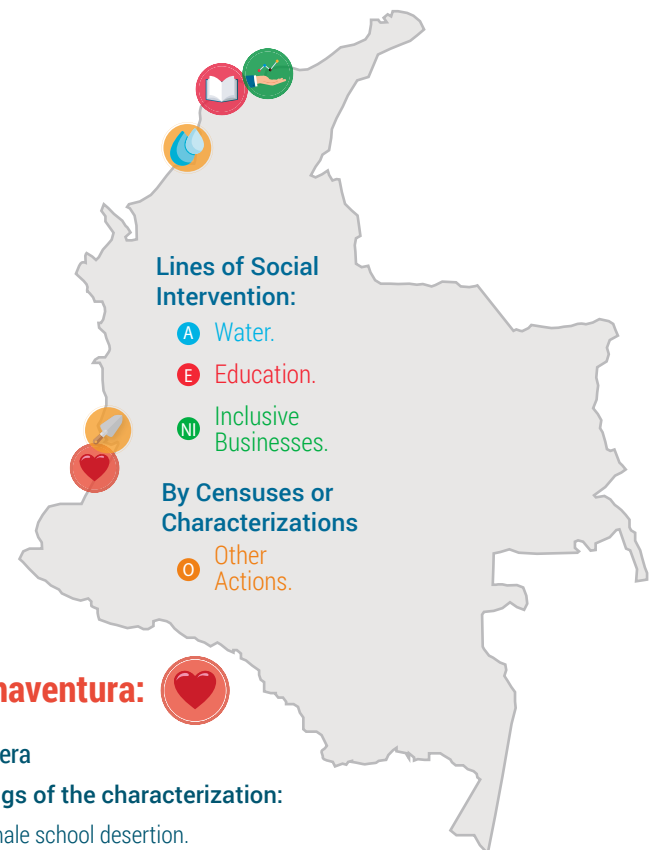
Las Flores

Findings of the characterization:

- ✓ Poor community infrastructure.
- ✓ Low level of higher education.
- ✓ Low level of employment.
- ✓ Presence of income poverty.

Intervention Programs, Projects and Actions:

- NI** Inclusive businesses: 1 business unit.
- E** Education: Courses; Technical and Technological Careers (SENA).
- O** Strengthening fishermen and social organizations.



Buenaventura:

La Palera

Findings of the characterization:

- ✓ Female school desertion.
- ✓ Population with unfinished school education.
- ✓ There is no sewage system: poor sanitation.
- ✓ Low comprehensive attention from the State.
- ✓ Poor community infrastructure and services.

Intervention Programs, Projects and Actions:

- O** Construction Project for the *La Palera* Community Center
- O** Community Action Board (*Junta de Acción Comunal, JAC*)
- O** Health Days (*Jornadas de Salud*).

The Organization has identified two risks to communities. The first is carrying out intervention actions that do not generate value for the communities, which is why the censuses and community characterizations are carried out in order to know the problems present. The second is the mismanagement of the relationship with the communities and their representatives, for which the Company conducts follow-up meetings, PQRS attention, materiality dialogues and direct contact with social leaders. In the same way, the main real impacts identified towards the communities are the obstruction of mobility when there are high peaks of receipt and dispatch of cargos, and the presence of particulate material of food and non-food bulk in neighboring areas of the **COMPAS** port facilities. When these risks materialize, it is reported to the Operations Area, responsible for adjusting the processes of vehicle entry and clearance of merchandise, trying to mitigate the impacts caused.

No concerns of the community have been identified regarding collective or individual rights potentially violated by the Organization's operations.



► Handing out school kits in Tolú

(203-1, 203-2)

Social investment in the areas where **COMPAS** operates increased by 10.3% compared to 2017. The main actions carried out during the year in the framework of its social intervention lines were:

Water

- » **Diáspora:** This program seeks to strengthen the marine ecosystem of the Gulf of Morrosquillo through the planting of mangroves and more than 100 artificial reefs made of recycled steel pipes and unused vessels. The strengthening of the ecosystem increases the concentration of fish and seafood and, therefore, the possibility of fishing for the local communities that subsist on this activity. In 2018, **COMPAS** supported the program with resources for mangrove plantings. This is an initiative of private companies, public entities and local authorities, with the support of the beneficiary communities.
- » Removal of sand from the Palo Blanco beaches in order to support the improvement of the beaches of this sub-zone of Tolú, benefitting the entire population that generates its income from tourism.



Education

- » The Verde Vivo Environmental Education Project seeks to strengthen the environmental culture in two educational institutions in Cartagena and Tolú.
- » Food Security and Academic Improvement Programs: **COMPAS** provides resources for the school lunch program and academic improvement at the Fernando de la Vega Educational Institution in Cartagena.
- » Support to the *Niños de Papel* Association for the construction and equipping of the cabinet-making classroom at the Marea de Turbaco (Bolívar) campus.
- » Delivery of school kits as a stimulus to children of the communities of influence, benefiting 1,000 people in all ports.



Inclusive Businesses

- » The Sustainable Agriculture Project seeks to generate food security through sowing and the generation of added value of traditional agricultural products, such as cassava (yucca) and sweet potato. It benefits 20 producers and their families in El Palmar (Tolú).
- » The Sustainable Business Cooperation Network (*Red de Cooperación Empresarial Sostenible*, Red-CES): accompaniment for the management of innovation and creation of strategic alliances that allow the sustainable development of seven productive units in Tolú.
- » Strengthening of a fishing unit of **ASOPESFLORES** Barranquilla, through the purchase of state-of-the-art equipment.



In 2018, it was decided to concentrate the focus of social management on these three lines of intervention, so that activities on governance and community strengthening were not started, as envisioned in 2017.

Other Actions

The Company also carries out donation, support and accompaniment actions to civil society organizations and the communities in their areas of influence.

The characterization of fishermen in Cartagena is pending to be carried out in 2019.

On the other hand, during 2018, **COMPAS** began prior consultation with the community councils of the Black communities of Punta Arena, Tierra Bomba, Bocachica and Caño del Oro, in order to analyze the impacts of the expansion of the **COMPAS** Cartagena terminal.

In contrast to the social management carried out for the hiring of local personnel, the goals established for the year were exceeded:

- Contractor Employability: In 2018, 45% of the personnel contracted came from the communities of influence, compared to 10.9% registered in 2017. The goal established is equal to or greater than 27%.
- **COMPAS** Employability: In 2018, 43% of the personnel contracted came from the communities of influence, compared to 29.1% registered in 2017. The goal established is equal to or greater than 13%.

The increase in the employability indicator in both **COMPAS** and contractors is due to two reasons:

- 1 As of 2018, the coverage defined as the area of influence for **COMPAS** Cascajal was expanded, for which the municipal capital of Buenaventura was included.
- 2 Continuous work together with contractors to raise awareness of the importance of hiring local labor.

(103-3)

The effectiveness of the social management process is evaluated through the audit process of the Comprehensive Management System. In addition, the indicators of the social management process are monitored. Finally, the petitions, complaints, claims and requests (PQRS) presented by the communities are attended to, and the opinion of the stakeholders is monitored through the permanent relationship and during the materiality dialogues.

(103-2)

2018 Milestones

- ✓ Publication of the first Progress Communication (Comunicación de Progreso, COP) on the Global Compact.
- ✓ The sustained growth of the Company's social investment, which rose from COP 354 million in 2013 to COP 1.218 billion in 2018.
- ✓ The closure of Phase II of the Sustainable Agriculture Program in Tolú with outstanding results, including high yields of cassava and sweet potato crops (average yield of 19 tons per hectare) and an increase in income for 20 producers.



(103-2)

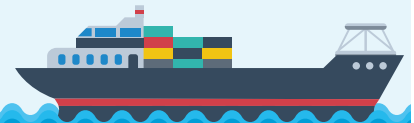
Future Challenges

Short-term goals – 0 to 2 years

- ★ Implement at least one program in the Inclusive Business Line in each of the port centers.
- ★ Resume training in job skills for people from the communities in all ports.
- ★ Submit to the Steering Committee a new line of intervention in governance and community strengthening for approval.

Medium-term goals – 3 to 5 years

- ★ Increase actions and investment in Corporate volunteering.
- ★ Increase the participation of local employment in COMPAS' direct contracting to 50%.





► Photo by Luis Alfonso Ortega



The Fundación Promotora del Canal del Dique operates as a non-profit organization

Social management *Fundación Promotora del Canal del Dique*



The Fundación Promotora del Canal del Dique started activities in October 2010, coinciding with one of the biggest emergencies in the country, caused by the La Niña phenomenon. This situation was decisive to define the work of the Foundation. Today, the entity operates as a **COMPAS** non-profit organization, which responds to the Company's strategy and sustainability policy.

The mission of the Foundation is to support and promote programs and projects that promote the well-being of the communities surrounding the Canal del Dique, facilitating participatory processes and promoting the sustainable management of natural resources.

Agricultural Programs

Description

- With the support of important allies, it promotes the establishment of biofortified crops and the local consumption of derived food products, to improve the food and nutritional security of low-income rural populations.
- Benefited communities: Puerto Badel, the Arjona township; the municipality of Mahates and Leticia, a Cartagena village
- Direct beneficiaries of agricultural programs: 85 producers.

2018 Milestones

- ✓ Alliance with HARVESTPLUS, leader of a global initiative to improve nutrition and public health, with the aim of obtaining the first variety of rice biofortified with zinc in Colombia.
- ✓ Two new communities in the area of influence of Canal del Dique joined the biofortified crop programs.

► Photo by Luis Alfonso Ortega



The Cartagena Water Fund

Description

- A long-term public-private initiative that seeks to reduce pressures on natural resources and the water supply system of Cartagena, which is the Canal del Dique and its lagoon system.
- Participating entities: The Office of the Mayor of Cartagena, Cardique, Acuacar, the Grupo Argos Foundation, the Fundación Promotora del Canal del Dique, the Mario Santo Domingo Foundation, the Cartagena Chamber of Commerce and The Nature Conservancy, representing the Latin American Water Fund Alliance.
- Communities benefited: Puerto Badel and Rocha, the Arjona townships; Correa, the town of María la Baja; and Bocacerrada town of San Onofre.
- Direct beneficiaries: 160 participants in the workshops, 56 members of the Bocacerrada community, and participants of the community nursery.

2018 Milestones

- ✓ Construction and implementation of the mangrove nursery in Bocacerrada.
- ✓ Design of the Cartagena Water Fund Observatory.
- ✓ Participatory construction of environmental agendas for each of the four (4) communities.
- ✓ The design of the Ecotourism Trail: Navigating Biodiversity (*Navengando la Biodiversidad*)

► The Town of Bocacerrada, in the Department of Sucre



Other milestones 2018

- ✓ The Foundation became a member of the Cartagena Thinking Center Academic Committee. In addition, it holds the chairmanship of the Corporación CLAYUCA Board of Directors.



► Corregimiento Leticia, Bolívar
Foto de Luis Alfonso Ortega



Future Challenges

- ★ Link new companies that allow the long-term financial sustainability of water conservation, with the support of the allies of the Cartagena Water Fund.
- ★ Obtain the first variety of rice biofortified with zinc in Colombia, to benefit vulnerable populations.
- ★ Implement the monitoring and monitoring strategy for the projects developed by the Foundation.





Social management *Fundación Puerto Aguadulce - Compas*



The Fundación Puerto Aguadulce – COMPAS **works in Buenaventura through six programmatic lines.**

The Puerto Aguadulce – **COMPAS** Foundation was formed on January 20, 2012, to manage programs and projects in the area of influence of the Sociedad Puerto Industrial Aguadulce, located in the Buenaventura district, through six programmatic lines:

- 1 Research and Community Development: The baseline of the population as a starting point for the participatory design of program and project interventions.
- 2 Health: Support the families of three community councils of the Black communities and the community of fishermen and farmers of Pichidó, so they can access services offered by the State once they are affiliated to SISBEN (a National identification system of potential beneficiaries of social programs for the population in poverty and vulnerability).
- 3 Education: Provide access to school education, literacy for non-literate people, complementary courses to improve work skills, technical training and university scholarships.
- 4 Generation of Income and Employment: Promotes employment, strengthen and encourage local entrepreneurship, economic inclusion and the visibility of the local economy to the rest of the country.
- 5 Housing: Promote the generation of housing spaces and healthy habitat in partnership with other institutions.
- 6 Sports, Recreation and Culture: Generate spaces for recreation, good use of free time for children and young people, and the rescue of local cultural practices.

The programs and projects aim to contribute to the improvement of the quality of life of the families, as well as to the social and economic inclusion of the community councils of the Black communities of Bajo Calima, Citronela, Córdoba, San Cipriano, Santa Helena and the families of the artisanal fishermen and farmers of Pichidó.

The Foundation serves a population of 6,570 people represented in 1,670 families, the vast majority of whom have been victims of armed conflict.

2018 Milestones

Generation of income and employment

- Start-up of the EMPRENDEPAZ Project in agreement with USAID and ACDIVOCA, for the development of 17 projects with a seed capital of COP 145,999,997, through which 60 new jobs were created.
- Technical assistance to agricultural enterprises, increasing by 60% the hectares sown with cocoa, banana, *bananito* and taro (*papachina*). In addition, greater visibility was given to the cultivation of taro in industrial processes (flour, chips, cakes and cookies), with the accompaniment of the CLAYUCA Corporation.

Education

- Connecting with 127 boys and girls who had dropped out of school or who were not connected.
- Strengthening ICT in the educational institutions of the communities with the support of the *Fundación Telefónica*.
- University scholarships for 25 young people.
- Training for 85 people in technical and technological training institutions.
- A total of 336 young people and adults involved in the literacy program.



Sports, recreation and culture

- Involving 240 children and young people to the Vive Bailando Project, which uses dance as a comprehensive pedagogy.



(103-2)

Future Challenges

- ★ Achieve the social and economic sustainability of 100 jobs created through the EMPRENDEPAZ Project, as well as strengthen the agricultural ventures focused on the transformation of taro and cocoa.
- ★ Provide 318 children and adolescents from the Talentos Paz-cífico Project with protective environments through the good use of free time, remaining in school and the positive upbringing from parents or caregivers.
- ★ Provide tools for conflict management in educational settings to 300 young people and adults in the literacy program, for the improvement of school coexistence.





► COMPAS Tolú

Cargo security and integrity

(103-1) (103-2)

The confidence placed in the provision of quality logistics services in the handling of cargo becomes the main motivation of COMPAS to maintain the priority of the care and protection of its clients' property, a goal that is achieved by strengthening the concept of three lines of defense in risk management. This defense is based on a first aspect that is made up of those processes that possess and manage risks; a second aspect is the backbone with functions of supervision, control and mitigation thereof, while a third aspect offers a perspective of verification from the references established. The second line of defense is strengthened with the implementation of SARLAFT, which adds values in the analysis and operational knowledge, providing valuable assistance in the management of risks inherent in the care of cargo.

The lines are based and concentrate their efforts on the supervision and control by those who manage the risks. The strategy consists of a first part that analyzes the operations daily to establish a risk profile. The second part of the strategy consists of knowing those who participate in the business, called "counterparties", in order to reach higher levels of reliability in the development of operations.

The protection process is the sum of several components, a human scheme that complies with rigorous selection processes; an electronic scheme that responds to a design and an operational requirement; a set of passive measures that require design and maintenance; a set of protocols that are part of the directive doctrine; and, above all, a leadership on the part of the heads of protection at each terminal. This work is complemented by the support of the authorities with which agreements are made, in addition to obtaining national and international protection certifications.

410-1

During 2018, 76.3% of security personnel received formal training in specific Human Rights policies and procedures.

(Our Own)

COMPAS' results in the management of the protection for 2018 are outstanding, maintaining a record of zero (0) events in attacks, cargo theft, stowaways and drug trafficking, due to failures or inefficiencies of the schemes created for that purpose with significant management in the strengthening of the Protection Management System that improved its method of risk management, in one case, by modifying its scheme (Cartagena), and, in the other, expanding its supervisory plant (Tolú), which contributed to reducing risk factors, saving costs and delivering sufficient means for efficient cargo care management.

A product of the strategic alliances with authorities, in one of the cases, and the effectiveness of the schemes, in another, the seizure of important quantities of narcotics – camouflaged in the cargo through the terminals of Cartagena and Barranquilla – was achieved.

All the **COMPAS** terminals reached certification in the Ship and Port Facilities Protection (*Protección de los Buques y de las Instalaciones Portuarias*, PBIP) International Code, which allows us to continue with the reception of international cargo ships. Likewise, the Business Alliance for Secure Trade (BASC) certification was obtained, which ensures that the Company's terminals have the best practices, free of illicit actions in the logistic chain that corresponds to each one.

A detail to highlight is the strengthening of the processes of the second line of defense in the head of those who manage the risks for the protection in the terminals of Tolú and Cartagena, with the extension of their supervisory and control schemes equating them with **COMPAS'** two terminals located in Buenaventura, which already had extended supervision schemes.

The procurement projects of the Organization of American States (OAS) and part of the implementation of access control were postponed for institutional reasons until 2019, at which time it will be decided when it is appropriate to restart.

(103-3)

Protection management maintains its frame of reference focused on the identification of its risks and the management to mitigate them, under the Corporate guidelines and in coherence with what is promoted by **COMPAS'** Comprehensive Policy. The management system works in an integrated manner with a process-based approach that works on a system of external and internal audits with the support of the Audit and Risk Department. Likewise, from the management process, Management Committees are held in which the management and results are monitored individually, ensuring the quality of the processes of the whole system that is certified by ICONTEC and by the maritime authority DIMAR.

For **COMPAS**, cargo safety and integrity is a priority, that is why to continue to meet the standards of quality in the operation, the following goals have been proposed:

► The Manzanillo Logistics Center (Cartagena)





(103-2)

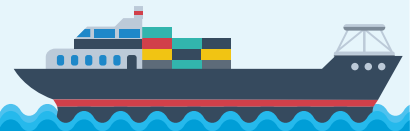
Future Challenges

Short-term goals – 0 to 2 years

- ★ Implement access controls in the Tolú and Cartagena terminals.
- ★ Strengthen SARLAFT, expanding the staff of analysts

Medium-term goals – 3 to 5 years

- ★ Implement access controls in other terminals.
- ★ Integrate the electronic systems, a process that consists of articulating video surveillance with electronic access control.





► COMPAS Bogotá

Relationship with clients

(103-1, 103-2, 103-3)

Clients constitute one of the key stakeholders for **COMPAS**. Cultivating lasting, trusting relationships with this group guarantees the generation of income, as well as the identification of opportunities to correct failures, improve management in general, support the strengthening of work networks and they are the main source of ideas and suggestions to generate business alternatives that consolidate the fulfillment of the Company's mission and strategic objectives.

COMPAS' relationship with its clients is personalized and close; each Commercial Officer has a portfolio with which he is connected and interacts with clients through meetings, calls or emails.

In addition to permanent contact with clients, the area attends to requests for quotations, negotiation and follow-up in the process of loading or unloading their merchandise; the Commercial Officer is responsible for hearing their requirements and knowing how to understand them. In the relationship with the client, the Commercial Area, responsible for its administration and monitoring, the Vice Presidency of operations and the Portfolio area, participate. Each one intervenes in different moments to fulfill different roles:

1



COMMERCIAL

The members of the Commercial Area are the first contact with the client, responsible for presenting the Company, its services, facilities and analyzing their needs not only in terms of loading/unloading, but also special handling and storage. Likewise, they evaluate additional client requirements in which COMPAS has opportunities to offer new services and, thus, fulfill the generation of new businesses that integrate the supply chain.

Even when the customer is being served directly by other areas of COMPAS, as is the case of their relationship with Operations during the handling of their cargo, the Commercial Area remains a support for the client, as well as a point of contact between the latter and Operations. Finally, when the services have been rendered, the Commercial Area follows up the payments and supports the Portfolio Area in the collection management.

2



VICE PRESIDENCY OF OPERATIONS

It is responsible for client compliance with the legal requirements and authorities to handle their cargo. It is responsible for the loading or unloading of the products, as well as their storage and care while they remain in the port facility.

3



BILLING

Once the service provided to the client is finished, Billing is responsible for generating the corresponding collection.

4



PORTFOLIO

It is in charge of keeping the Company's portfolio healthy, keeping track of customer payments, due dates and informing the commercial managers responsible for the accounts to support them in their recovery management.



The accompaniment made by each area is integrated into a single process that seeks for the client to feel continuity and find synergies that maximize their operation, thus impacting the **COMPAS'** positioning and the frequency of use of the terminals, which results in the increase of revenue and more efficient use of facilities.

In addition to the dialogue established between the client and those responsible for the operation in **COMPAS**, the Company has two more communication channels. The first is a channel to address their petitions, complaints, claims and requests (PQRS), which can be accessed through the website. The second is a monthly newsletter implemented at the end of 2018 and whose target audience is clients and shipping agents. To these are added the official communications sent through the Communications Area via email or through the News section of the Company's website.

Client Satisfaction

COMPAS implemented an online survey that it sends once a year to its customer database; its main objective is to measure its level of satisfaction in the following action fronts:

- 1 Service received from **COMPAS'** Commercial Management.
- 2 Service received by the Operational Area in the terminals.
- 3 **COMPAS'** response process to the incidents presented.
- 4 Evaluation of operations in terms of infrastructure, lighting, security, efficiency, attention and the timely solution of requirements, etc.
- 5 Importance given by the client to the following **COMPAS** attributes: agility in the provision of the service, customer orientation, friendliness of the officials, port network, quality of service, Corporate Social Responsibility.

The satisfaction survey conducted in 2018 had the participation of 86% of customers, 28% more compared to 2017.

The 2018 sample resulted in a general satisfaction index of 89%, obtaining very positive results in aspects such as the confidence transmitted in the commercial process (97%), security (95%), infrastructure of operations (94%). Of the six (6) attributes evaluated, agility in the provision of the service has the most relevance for clients.



The result of the 2018 sample was a general client satisfaction index of 89%.



Some of the aspects that present opportunities for improvement are related to the Areas of Operations, Infrastructure and Communication with Clients.

* To see the results of the Satisfaction Survey, see the Annexes on page 153.

At the end of the survey, clients also found a space to expand information related to the qualifications or leave comments that they consider important. It is these comments, both positive and negative, that feed the Company's Management System – *Kawak* – and about which the areas directly responsible establish action plans and corrective actions – in the case of complaints or claims – to prevent them from happening again. *Kawak* is the Management System that integrates the entire Company's policies, processes, procedures and action plans.

The following aspects were key to increasing the level of customer satisfaction:

- 1 At the infrastructure level, works were completed at the Aguadulce and Barranquilla terminals.
- 2 Creation of a patio specialized in steel handling at **COMPAS** Aguadulce.

Additionally, during the reporting period, emphasis was placed on the search for projects oriented to the integration of the logistics chain, such as the search for new operations in other terminals, review of new businesses for the Manzanillo Logistics Center, and the possibility of providing the latter's services in other locations. In the third quarter of 2018, the Executive Vice-Presidency was created within the Organization, which has as its main responsibility the search for new approaches to the business.

For 2019, the Company intends to continue consolidating itself as the only multipurpose port network in the country, emphasizing the integration of the logistics operation and achieving 90% satisfaction in the Client Satisfaction Index.

(418-1)

During 2018, no claims were registered associated with breaches of the privacy of **COMPAS** customers, either through the direct channel, third parties or regulatory authorities.



► COMPAS Aguadulce

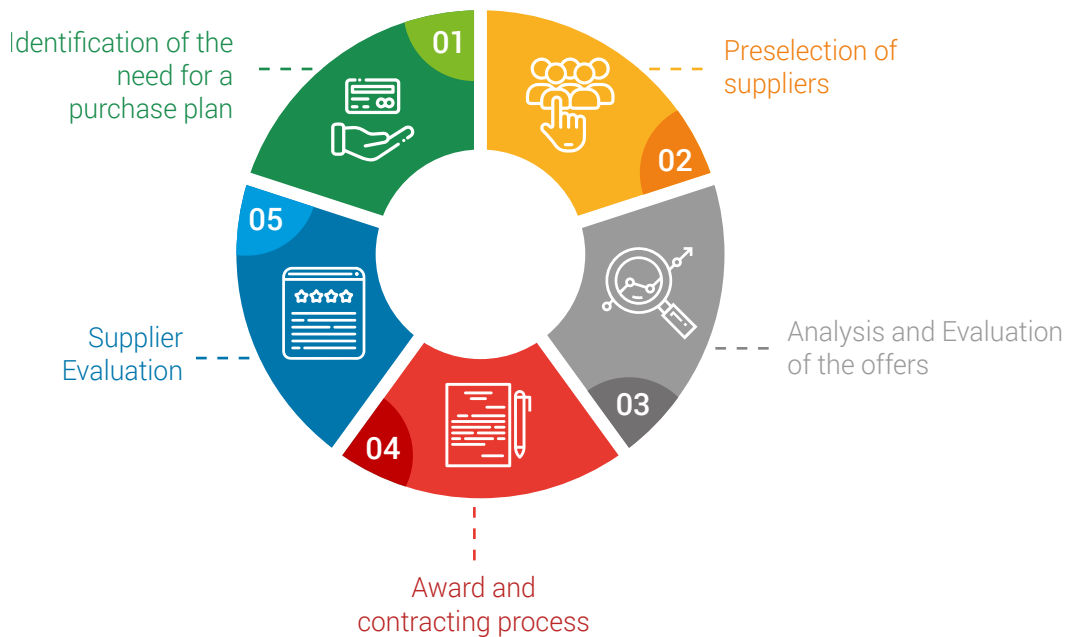
Management of suppliers

(103-1) (103-2)

Managing the supply chain is relevant for **COMPAS** because it allows generating value and guaranteeing the supply of goods and services for the effective operation of the business. Generating beneficial relationships with the actors of the chain contributes directly to the control of risks, insofar as possible failures are anticipated in the supply process and the delivery of products and services, reducing the direct impact that would be generated on the cost of the operation.

The commercial relationships with suppliers and clients are framed in the guidelines established in the Contracting Manual and are based on ethical principles that ensure transparency and honesty for mutual benefit, as well as high standards of quality and service.

The process of supplying **COMPAS** is made up of five (5) stages:



At each stage of the supply chain, there are some risks, including:

Stage	Description of the Risk	Mitigation Measure
1	The development of an inadequate supply plan.	<ul style="list-style-type: none"> Application of the procedures contemplated in the Contracting Manual.
	Incorrect definition of the object to be contracted and its scope.	
2	Acquire goods and services with suppliers that are on lists to control money laundering and the financing of terrorism.	<ul style="list-style-type: none"> Validation in restrictive lists in the registration and updating of suppliers.
	Commissions, privileges or gifts offered by the supplier in exchange for obtaining benefits.	<ul style="list-style-type: none"> Formation of an Expert Committee with different contracting areas to select the supplier; all this within the framework of the Company's Code of Ethics and Company guidelines.
	Illicit activities by the supplier.	
3	Negotiate in foreign currency without considering exchange fluctuations.	<ul style="list-style-type: none"> Application of the procedures contemplated in Chapter 4.8.2 – Stipulation of the Currency in the Contract – in the Contracting Manual.
	Selection of suppliers with incorrect criteria.	
4	No assignment of policies and/or guarantees that are consistent with the nature of the contract.	<ul style="list-style-type: none"> Application of the procedures contemplated in Chapter 4.8.5 – Policies and Guarantees – in the Contracting Manual.
	The contract does not adequately reflect the conditions of the negotiation.	
5	Not evaluating suppliers adequately.	<ul style="list-style-type: none"> Application of the Evaluation Criteria established in the Purchasing Procedure.

(103-3)

COMPAS verifies compliance with the requirements and the effectiveness of the management through internal and external audits, such as ISO 9001 and the Business Alliance for Secure Commerce (BASC); these results ensure the continuous improvement of supply chain processes. Additional mechanisms, such as primary groups, generate spaces for direct communication so that team members know **COMPAS'** most important events, and manage to track the progress of the projects in the area and the resolution of common issues that are generated day by day. The leaders of the processes participate in these primary groups.

Annually, compliance with the criteria established in the Contracting Manual is verified and audits and validation visits are carried out by an interdisciplinary group made up of **COMPAS** employees.

The Company has a space on the website (www.compas.com.co/es/pqrs) to receive and effectively manage the communications generated by its suppliers. The relationship is managed by the Purchasing Area and petitions, complaints, claims and requests (PQRS) are received and managed, with the possibility of online monitoring by the provider.

(102-9, 102-10, 204-1)

The Supply Chain

COMPAS is supplied with a wide variety of goods and services. The main categories of suppliers involved in the supply chain are:

- ✓ Travel agencies
- ✓ Food
- ✓ General and industrial cleaning
- ✓ Access control
- ✓ Dredging or re-cleaning
- ✓ Infrastructure maintenance
- ✓ Equipment maintenance
- ✓ Metrology (Operation equipment)
- ✓ Operator of technological media
- ✓ Environmental monitoring
- ✓ Port operator
- ✓ Suppliers of equipment for the operation
- ✓ Supply of fuels
- ✓ Individual protection equipment and elements
- ✓ Energy supply
- ✓ Surveillance and private security

IN 2018, **COMPAS** made transactions for goods and/or services with a total of 915 suppliers, for a total amount of COP 89,811,352,431.



★ Amount Purchased

Local suppliers are essential to guarantee operations in **COMPAS'** areas of influence. As local suppliers, Colombian suppliers, which satisfy the criteria of proximity, accessibility and level of service with respect to the area of coverage of a port terminal or **COMPAS** office, are identified. They represent 98% of the suppliers registered and 99.45% of the purchases made in 2018.

In 2018, there was a significant change in the Company structure that had an impact on the Company's supply chain: BOSCOAL Port Operators S. A. S., a port facility located in the Aguadulce Peninsula in Buenaventura, which was a **COMPAS** subsidiary. It was merged in November 2018 through absorption by **COMPAS**. This change was notified in due time to suppliers to update their billing systems with the **COMPAS** data, in order to provide continuity to the services provided and/or delivery of goods.

(103-2, 308-1, 308-2, 414-1, 414-2)

Supplier Selection and Evaluation

By 2018, 222 new local suppliers and 10 new foreign suppliers were registered in the Supplier Master List. For the registration of suppliers, only tax, legal and security information is evaluated; none of the suppliers was found registered in restrictive lists, nor did they present discrepancies in legal documentation. In this selection phase, environmental and social criteria are not taken into account.

In COMPAS, criteria are established and applied for supplier evaluation based on their capacity to provide the goods and services required. For this, the following controls are exercised, depending on the level of risk: high, medium and low.

Level of Risk	Criteria	Procedure Applied by COMPAS
High	<ul style="list-style-type: none"> Critical suppliers that provide their services in the COMPAS facilities, for more than 70% of the working time. More than 10 employees hired. Execution of high-risk activity. 	Annual evaluation through audits and validation visits by an interdisciplinary group composed of COMPAS personnel, who rectify the information related to compliance with labor regulations, social management, the environment, physical safety and occupational health.
Medium	<ul style="list-style-type: none"> Critical suppliers that provide their services in the COMPAS facilities, for more than 70% of the working time. Less than 10 employees hired. 	Annual performance evaluation and updating of data.
Low	<ul style="list-style-type: none"> Non-critical suppliers 	Annual updating of their data.

Since 2014, the Company has a rigorous process in which it establishes a methodology and fundamental criteria to identify critical suppliers for the organization. For COMPAS, a critical supplier is one whose products or services have a great impact on the development of the port operation, affecting people, infrastructure, processes, technology and the environment. Based on this definition, for the year 2018, 13.4% of the suppliers that had transactions of goods and services were registered as critical suppliers.

This evaluation system allows verifying that suppliers comply in an integral manner with the requirements agreed upon in the contract and/or purchase order. The supplier is informed of the start of the evaluation process and the delivery of the results; in addition to this, if they present opportunities for improvement and/or breaches of law, the provider must submit an action plan or – in failing to do so – it will not continue providing the service In the Organization.

There are two mechanisms within the supplier evaluation process:

In the first instance, there is a **performance evaluation** that applies to all the Organization's critical suppliers; it is carried out with the participation of the responsible user in order to request the good or the service and includes criteria to evaluate, such as quality and opportunity, good cost/service, service during and after-sale, management systems.

In 2018, **117** suppliers participated in the **performance evaluation** process with the following results:

A total of 85% of the critical suppliers registered in 2018 meet the minimum requirements demanded by the Organization; therefore, they can remain for a period longer in the organization. Only 15% of the critical suppliers evaluated by the users obtained a fair or low rating.

In the second instance, there are the **evaluation visits** to the supplier, the scope of which is towards the critical suppliers that have a high level of risk. This process consists of an audit at the supplier's facilities in order to know and highlight their current conditions, documentary review with interviews of the people responsible for the processes, then traveling through the facilities to observe and verify good practices. It is during this phase that social and environmental criteria are taken into account, such as compliance with labor obligations with their employees, timely delivery of equipment and individual protection elements (*Elementos de Protección Individual*, EPI), compliance with the provisions of the Environmental Management Plan of the port facility, measurement of energy and water consumption, existence of welfare plans for employees and social management programs with the communities in the area of influence, generation of local employment, etc.

During the visit, the supplier's assessment is carried out through the **COMPAS** Suppliers' Self-Assessment Format of Standards, by an interdisciplinary group made up of Human Management personnel, the Environmental Management Department, SISO, physical protection and supplier management, who rectify the related information in its corresponding aspects. For the year 2018, 24 critical suppliers that provide their services within the **COMPAS** port facilities on a permanent basis, and that have more than 10 workers hired were visited. The supplier evaluation process has made it possible to optimize the delivery without interruptions of the contracted services, obtain information on supplier performance and detailed information for future hiring.

(308-2) (414-2)

For negative impacts in the supply chain, see the Annexes on page 154.

(103-2, 407-1, 408-1, 409-1)

2018 Milestones

- ✓ Of the 232 new suppliers registered in 2018, there were zero (0) findings in restrictive lists.
- ✓ In 2018, 24 suppliers were visited who provide their services in the **COMPAS** port facilities, in order to verify on site the progress in their processes, compliance and management in aspects of sustainability, labor, the environment, physical safety, occupational health and industrial safety.
- ✓ For 2018, negotiations were held with suppliers to cover 11 groups of services and/or goods that are important for **COMPAS** due to their criticality, turnover or price.
- ✓ In order to improve services and efficiently manage communications with suppliers, in 2018 **COMPAS** arranged a new space on its website (<http://www.compas.com.co/es/Proveedores-Compas>) for them to consult information of interest about legal documents for **COMPAS** and/or affiliates, VAT and ICA withholding certificates, requirements and schedules for filing invoices and delivery of goods and payment policy.
- ✓ No operations and suppliers with significant risk of cases of child labor or forced or compulsory labor were identified, or in which the right to freedom of association and collective bargaining could be at risk.



(103-2)

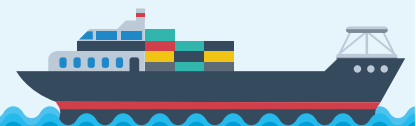
Future Challenges

Short-term goals – 0 to 2 years

- ★ Update the database of suppliers of goods and services that had transactions in 2018.
- ★ Exercise greater control and monitoring of the compliance of deliveries by suppliers.
- ★ Strengthen business relationships with suppliers through the establishment of agreements at the levels of services, contracts, price lists, etc.

Medium-term goals – 3 to 5 years

- ★ Implement Phase II of the Supplier Development Program, which includes the application of the toolkit with the assistance of a specialized consultant.





6

Profitability and growth

Profitability and growth

(103-1, 103-2, 103-3)

Managing profitability in **COMPAS** is fundamental because – thanks to growth and a greater generation of value – commitments with the Organization's stakeholders are fulfilled, reinvesting resources not only in the operation but also in the environment and society. The Company's growth generated value in an integral manner for all parties and when working in this manner, the Company's long-term sustainability is guaranteed.

COMPAS provides value through investment in infrastructure, reinvestment in operations, the contribution of resources to communities in its areas of influence, the integral development of its employees, the best service to clients, compliance with suppliers, payment of taxes and the fulfillment of the commitments with the Nation, and the generation of economic return for its shareholders.

COMPAS' Corporative Values are the guide and guidelines under which the Organization is governed to achieve the strategic objectives. Integrity, agility, respect, innovation, quality and teamwork are the framework for decision making. Based on this, **COMPAS** seeks to provide innovative, quality and increasingly comprehensive logistics services that meet the needs of clients, who require rapid-response capacity in an increasingly globalized world. Add value to the services provided to clients to achieve a minimum of 90% satisfaction. Develop new businesses that allow integrating the value chain in logistics projects.

During 2018, an important investment plan of around USD 25 million was complied with in the network of multipurpose port terminals. With this, in addition to complying with the Nation, **COMPAS** seeks to be more efficient every day in operations and consolidate its presence in the sector. Specific projects – such as the inauguration of the steel yard in **COMPAS** Aguadulce with a storage capacity of 19,000 tons, the alignment of the four berths positions in **COMPAS** Barranquilla and the start of the expansion of the Tolú port facility – confirm the Company's commitment with the development of the port sector in Colombia.

(201-1)

	2016		2017		2018	
	Millons COP	Millons USD	Millons COP	Millons USD	Millons COP	Millons USD
Economic value generated	\$125.508,8	\$41,1	\$171.799,6	\$58,2	\$190.102,3	\$64,3
Operating income	\$125.508,8	\$41,1	\$171.799,6	\$58,2	\$190.102,3	\$64,3
Net income			\$171.254,0	\$58,0	\$189.843,0	\$64,2
Income from financial investments			\$545,6	\$0,2	\$259,3	\$0,1
Economic value distributed	\$99.123,6	\$32,5	\$154.324,7	\$52,3	\$170.182,8	\$57,6
Operating expenses	\$52.951,0	\$17,3	\$86.773,9	\$29,4	\$85.207,3	\$28,8
Purchase of material supplies	\$52.951,0	\$17,3	\$86.773,9	\$29,4	\$85.207,3	\$28,8
Costs of employee training						
Employee salaries and benefits	\$19.103,1	\$6,3	\$24.973,4	\$8,5	\$28.809,8	\$9,7
Salaries and para-fiscal expenses	\$19.103,1	\$6,3	\$24.973,4	\$8,5	\$28.809,8	\$9,7
Payments to capital suppliers	\$14.114,2	\$4,6	\$29.409,9	\$10,0	\$40.396,7	\$13,7
Interest payments to credit suppliers	\$14.114,2	\$4,6	\$29.409,9	\$10,0	\$40.396,7	\$13,7
Payments to governments	\$12.047,5	\$3,9	\$12.276,2	\$4,2	\$14.816,0	\$5,0
Direct and indirect taxes to the Government	\$12.047,5	\$3,9	\$12.276,2	\$4,2	\$14.816,0	\$5,0
Investment in the community	\$907,8	\$0,3	\$891,5	\$0,3	\$953,0	\$0,3
Investment in social programs aimed at the communities in the area of influence	\$907,8	\$0,3	\$891,5	\$0,3	\$953,0	\$0,3
Investment in infrastructure						
Economic Value Withheld	\$26.385,2	\$8,6	\$17.474,9	\$5,9	\$19.919,5	\$6,7

Average Exchange Rate by Year (COP = 1 USD)	3052,13151	2950,63694	2955,81071
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(201-4)

Financial Assistance Received from the Government

Total monetary value of the financial assistance received by the Organization from any Government for:	2016 COP	2017 COP	2018 COP
Tax deductions and tax credits	No information	For the reporting period, no benefits were received from the Government	For the reporting period, no benefits were received from the Government
Subsidies			
Subsidies for investments, subsidies for Research and Development and other types of relevant subsidies			
Awards			
Exemption from royalty payments			
Financial assistance from Export Credit Agencies (ECA)			
Financial incentives			
Other financial benefits provided or that may be provided by a government for any operation			



Global reporting initiative (GRI) content index

GRI Standard	Content	Location	Global Compact
GRI 101: Foundation 2016			
General content			
GRI 102: General disclosure 2016			
Organizational profile			
102-1	Name of the organization	About COMPAS. Pg. 16	
102-2	Activities, brands, products and services	About COMPAS. Pgs. 16 & 17	
102-3	Location of headquarters	About COMPAS. Pg. 17	
102-4	Location of operations	About COMPAS. Pg. 17	
102-5	Ownership and legal form	About COMPAS Pg. 18	
102-6	Markets served	About COMPAS. Pg. 17	
102-7	Scale of the organization	About COMPAS. Pg. 18	
102-8	Information on employees and other workers	Talent Development and Management Pg. 50 Annexes - Talent Development and Management Pg. 123	6
102-9	Supply chain	Supplier Management - The COMPAS Supply Chain Pg. 98	
102-10	Significant changes to the organization and its supply chain	Supplier Management - The COMPAS Supply Chain Pg. 99	7
102-11	Precautionary Principle or Approach	Comprehensive Environmental Management Pg. 57	
102-12	External initiatives	ANDI – The National Association of Businessmen of Colombia. ANALDEX – The National Foreign Trade Association CAMACERO – The Colombian Steel Chamber FENALCO -- The National Federation of Merchants CIP -- The Inter-American Committee of Ports The Global Compact	
102-12	Membership of associations	FITAC -- The Colombian Federation of Logistics Agents in International Trade CCI – The Colombian Chamber of Infrastructure ACRIP Bolívar – The Colombian Association of Industrial Relations BASC – Business Alliance for Secure Commerce. The Colombian Security Council Bloomberg	
Strategy			
102-14	Statement from senior decision makers	Letter from the President Pg. 10	
102-15	Key impacts, risks and opportunities	Letter from the President Pg. 10 Risk Management - Strategic Risk Pg. 44	
Ethics and integrity			
102-16	Values, principles, standards and norms of behavior	Ethics, Transparency and Anti-Corruption Pg. 73	10
102-17	Mechanisms of advice and ethical concerns	Ethics, Transparency and Anti-Corruption Pgs. 73 & 74	10

GRI Standard	Content	Location	Global Compact
Governance			
102-18	Governance structure	Corporate Governance Pg. 67 Annexes - Corporate Governance Pgs. 150 & 151	
102-19	Delegation of authority	Corporate Governance - Delegation of authority Pg. 68	
102-20	Executive-level responsibility for economic, environmental and social issues	Corporate Governance - Delegation of authority Pg. 68	
102-21	Consultation with stakeholders on economic, environmental and social issues	Corporate Governance - Delegation of authority Pg. 69	
102-22	Composition of the highest governance body and its committees	Corporate Governance. Pg. 67 Annexes - Corporate Governance Pg. 150	
102-23	President of the highest governing body	Corporate Governance. Pg. 67 Annexes - Corporate Governance Pg. 150	
102-24	Nomination and selection of the highest governance body	Corporate Governance - Board of Directors Pg. 67	
102-25	Conflicts of interest	Corporate Governance - Management of conflicts of interest Pg. 68	
102-26	Role of the highest governance body in the selection of purposes, values and strategy	Corporate Governance - Steering Committee Pg. 70	
102-29	Identification and management of economic, environmental and social impacts	Corporate Governance - Steering Committee Pg. 69	
102-30	Effectiveness of risk management processes	Corporate Governance - Steering Committee Pg. 69 Risk Management: Results. Pg. 45	
102-31	Evaluation of economic, environmental and social issues	Corporate Governance - Steering Committee Pg. 69 Risk Management: Results. Pg. 45	
102-32	Role of the highest governance body in the preparation of sustainability reports	About this report Pg. 6	
102-33	Communication of critical concerns	Any critical issue or important concern is first reported to the Company's Presidency and is directly reported to the Board of Directors or, in other cases, the Vice President of the respective area is invited to the Board of Directors' meetings, so they can be analyzed in this scenario.	
Stakeholder dialogue			
102-40	List of stakeholder groups	Annexes - Stakeholder Groups Pg. 122	
102-41	Collective bargaining agreements	Talent development and management: Principal talent indicators Pg. 50 Annexes - Talent development and management Pg. 126	3
102-42	Identifying and selecting stakeholders	Sustainability focus - Stakeholders Pg. 40	
102-43	Approach to stakeholder engagement	Sustainability focus - Stakeholders Pg. 40 Annexes - Stakeholders Pg. 122	
102-44	Key topics and concerns raised	Annexes - Stakeholders Pg. 122	

GRI Standard	Content	Location	Global Compact
Reporting practice			
102-45	Entities included in the Consolidated Financial Statements	About this report. Pg. 6	
102-46	Defining report content and topic boundaries	Sustainability focus - Materiality Pg. 38	
102-47	List of material topics	Sustainability focus - Materiality Pg. 39	
102-48	Restatements of information	About this report. Pgs. 6, 7, 18 & 59	
102-49	Changes in reporting	About this report. Pg. 6	
102-50	Period covered by the report	About this report. Pg. 6	
102-51	Date of the last report	About this report. Pg. 6	
102-52	Reporting cycle	About this report. Pg. 6	
102-53	Contact point for questions regarding the report	About this report. Pg. 7	
102-54	Claims of reporting in accordance with the GRI Standards	About this report. Pg. 6	
102-55	GRI Content Index	GRI Content Index. Pg. 109	

GRI Standard	Content	Location	Omissions	Global Compact
Specific contents - material issues				
Ethics, transparency and corporate governance				
GRI 103: Management Approach 2016				
GRI 205: Anti-Corruption 2016				
GRI 206: Anti-Competitive Behavior 2016				
GRI 415: Public Policy 2016				
GRI 419: Socioeconomic Compliance 2016				
103-1	Explanation of the material topic and its boundary	Corporate Governance - Pgs. 66 & 72		
103-2	The management approach and its components	Corporate Governance - Pgs. 66, 70, 72 & 75		
103-3	Evaluation of the management approach	Corporate Governance - Pgs. 66 & 75		
205-1	Operations evaluated for risks related to corruption	Annexes -- Ethics, Transparency and Anti-Corruption Pg. 152	The significant risks related to corruption and identified by the risk assessment are not reported	10
205-2	Communication and training about anti-corruption policies and procedures	Ethics, Transparency and Anti-Corruption Pg. 74 Annexes -- Ethics, Transparency and Anti-Corruption Pg. 152	Only information for employees is reported	10
205-3	Confirmed cases of corruption and measures taken	Ethics, Transparency and Anti-Corruption Pg. 74		10
206-1	Legal actions for anti-competitive behavior, anti-trust and monopoly practices	The Organization has not been subject to legal proceedings brought about by legal actions related to unfair competition, monopolistic practices or against free competition		
415-1	Contributions to political parties and/or representatives	COMPAS did not make political contributions during the reporting period.		
419-1	Failure to comply with laws and regulations in the social and economic fields	During the reporting period, the Organization did not receive significant fines or monetary penalties for non-compliance with laws or regulations in social or economic matters. The Company set the sum of Fifty Million Pesos (COP 50,000,000) as materiality criteria.		
Profit and growth				
GRI 103: Management approach 2016				
GRI 201: Economic performance				
103-1	Explanation of the material topic and its boundary	Profit and growth. Pg. 104		
103-2	The management approach and its components	Profit and growth. Pg. 104		
103-3	Evaluation of the management approach	Profit and growth. Pg. 104		
201-1	Direct economic value generated and distributed	Profit and growth. Pg. 105		
201-4	Financial assistance received from government	Profit and growth Pg. 106		

GRI Standard	Content	Location	Omissions	Global Compact
Risk management				
GRI 103: Management approach 2016				
103-1	Explanation of the material topic and its boundary	Risk Management. Pg. 42		
103-2	The management approach and its components	Risk Management. Pgs. 42 & 45		
103-3	Evaluation of the management approach	Risk Management. Pg. 44		
Relations with clients				
GRI 103: Management approach 2016				
GRI 418: Client privacy 2016				
103-1	Explanation of the material topic and its boundary	Relations with clients. Pg. 92		
103-2	The management approach and its components	Relations with clients. Pg. 92		
103-3	Evaluation of the management approach	Relations with clients. Pg. 92		
418-1	Fundamental claims related to violations of client privacy and loss of client data	Relations with clients. Pg. 95		
Our Own	Results of the satisfaction survey	Annexes - Relations with clients. Pg. 153		
Supplier management				
GRI 103: Management approach 2016				
GRI 204: Sourcing practices 2016				
GRI 308: Environmental assessment of suppliers 2016				
GRI 407: Freedom of association and collective bargaining 2016				
GRI 408: Child labor 2016				
GRI 409: Forced or compulsory labor 2016				
GRI 414: Social assessment of suppliers 2016				
103-1	Explanation of the material topic and its boundary	Supplier management. Pg. 96		
103-2	The management approach and its components	Supplier management. Pgs. 96, 99 & 101		
103-3	Evaluation of the management approach	Supplier management. Pg. 97		
204-1	Proportion of spending on local suppliers	Supplier management - COMPAS supply chain Pg. 98 Annexes Pg. 155		
308-1	New suppliers that have passed screening and selection filters according to environmental criteria	Supplier management - Supplier selection and assessment Pg. 99 Annexes Pg. 155		
308-2	Negative environmental impacts in the supply chain and actions taken	Annexes. Pg. 154 Supplier management. - Supplier selection and assessment. Pg. 99		
407-1	Operations and suppliers whose right to freedom of association and collective bargaining could be at risk	Supplier management. - Milestones 2018. Pg. 101		3
408-1	Operations and suppliers with significant risk of cases of child labor	Supplier management - Milestones 2018. Pg. 101		5
409-1	Operations and suppliers with significant risk of cases of forced or compulsory labor	Supplier management - Milestones 2018. Pg. 101		4
414-1	New suppliers that have passed selection filters according to social criteria	Supplier management - Supplier selection and assessment. Pg. 99 Annexes. Pg. 155		
414-2	Negative social impacts in the supply chain and actions taken	Annexes. Pg. 154 Supplier management - Supplier selection and assessment. Pg. 99		

GRI Standard	Content	Location	Omissions	Global Compact
Cargo security and integrity				
GRI 103: Management approach 2016				
GRI 410: Psecurity practices 2016				
103-1	Explanation of the material topic and its boundary	Cargo security and integrity. Pg. 88		
103-2	The management approach and its components	Cargo security and integrity. Pgs. 88 & 91		
103-3	Evaluation of the management approach	Cargo security and integrity. Pg. 90		
410-1	Security personnel trained in Human Rights policies or procedures	Cargo security and integrity. Pg. 89		2
Our Own	Incidents related to cargo security	Cargo security and integrity. Pg. 89		
Our Own	Incidents related to theft, entry of stowaways and pollution of cargo	Cargo security and integrity. Pg. 89		
Occupational health and safety				
GRI 103: Management approach 2016				
GRI 403: Occupational health and safety 2016				
103-1	Explanation of the material topic and its boundary	Occupational health and safety. Pg. 52		
103-2	The management approach and its components	Occupational health and safety. Pgs. 52, 53, 54 & 55		
103-3	Evaluation of the management approach	Occupational health and safety. Pg. 54		
403-1	Representation of employees in formal worker-company health and safety committees	Annexes - Occupational health and safety. Pg. 137 Occupational health and safety. Pg. 54		6
403-2	Types of accidents and accident frequency rates, occupational diseases, lost days, absenteeism and number of deaths due to work-related accidents or occupational diseases	Annexes - Occupational health and safety. Pgs. 138, 139, 140 & 141	The types of accidents are not reported	
Talent development and management				
GRI 103: Management approach 2016				
GRI 202: Presence in the market 2016				
GRI 401: Employment 2016				
GRI 402: Worker - company relations 2016				
GRI 404: Training and education 2016				
GRI 405: Diversity and equal opportunities 2016				
GRI 406: Non-discrimination 2016				
GRI 412: Assessment of human rights 2016				

GRI Standard	Content	Location	Omissions	Global Compact
103-1	Explanation of the material topic and its boundary	Talent development and management. Pg. 46		
103-2	The management approach and its components	Talent development and management. Pgs. 46, 48 & 51		
103-3	Evaluation of the management approach	Talent development and management. Pg. 48		
202-1	Ratio of standard initial category salary be sex to the local minimum wage	Annexes - Talent development and management. Pg. 127	There is no discrimination by terminal, since the same minimum salary is used in all terminals in the country. Direct / indirect employees are not discriminated against since all terminals uses the same minimum salary according to current national labor regulations.	6
202-2	Proportion of senior executives hired from the local community	Talent development and management - Principal talent indicators. Pg. 50 Annexes - Talent development and management. Pg. 127	The definition for "senior executives" is not given.	6
401-1	New employee hiring and staff rotation	Talent development and management - Principal talent indicators. Pg. 50 Annexes - Talent development and management. Pgs. 128, 129 & 130		6
401-2	Benefits for full-time employees that are not given to part-time or temporary employees	Talent development and management - Principal talent indicators. Pg. 50 Annexes - Talent development and management. Pgs. 130 & 131	Not included: Provisions for retirement and parental leave (because it is reported in a separate indicator)	6
401-3	Parental leave	Annexes - Talent development and management. Pg. 132		
402-1	Minimum warning periods on operational changes	COMPAS gives prior notice to workers before putting into effect significant operational changes that could substantially affect them. The minimum weeks of notice are made according to the minimum times required by the projects.	The minimum number of weeks of notice is not specified	
404-1	Average training hours per year per employee	Talent development and management - Principal talent indicators. Pg. 50 Annexes - Talent development and management. Pg. 133		6
404-2	Programs to improve employee skills and transition-assistance programs	Annexes - Talent development and management. Pg. 134	The content of the transition-assistance programs provided to facilitate continued employability and end-of-career management through retirement or dismissal is not detailed.	
404-3	Percentage of employees who receive periodic evaluations of professional performance and development	Talent development and management - Principal talent indicators. Pg. 50 Annexes - Talent development and management. Pg. 135	This is not discriminated by sex.	

GRI Standard	Content	Location	Omissions	Global Compact
405-1	Diversity in governance bodies and employees	Annexes - Talent development and management. Pg. 136	No information is reported by other indicators of diversity, such as minority groups or vulnerable groups. Employee diversity is reported in Indicator 102-8.	6
405-2	Ratio of base salary and remuneration of women to men	Talent development and management - Principal talent indicators. Pg. 50 Annexes - Talent development and management. Pg. 136	This is not discriminated by terminal.	6
406-1	Cases of discrimination and corrective actions undertaken	Talent development and management - Principal talent indicators Pg. 50		1, 6
412-2	Training of employees in Human Rights policies or procedures	Talent development and management - Principal talent indicators. Pg. 50 Annexes - Talent development and management. Pg. 133		2
Our Own	Diversity	Annexes - Talent development and management. Pg. 126.		
Our Own	Absenteeism	Annexes - Talent development and management. Pg. 126.		
Social management				
GRI 103: Management approach 2016				
GRI 203: Impactos económicos indirectos 2016				
103-1	Explanation of the material topic and its boundary	Social management. Pg. 76		
103-2	The management approach and its components	Social management. Pgs. 76, 81, 85 & 87		
103-3	Evaluation of the management approach	Social management. Pg. 80		
203-1	Investments in infrastructure and support services	Social management. Pg. 78		
203-2	Significant indirect economic impacts	Social management. Pg. 78	The importance of indirect economic impacts is not reported in the context of external benchmarks or the priorities of stakeholders, such as national and international standards, protocols and political agendas.	
Our Own	Amount of social investment	Annexes- Social management. Pg. 152		

GRI Standard	Content	Location	Omissions	Global Compact
Comprehensive environmental management				
GRI 103: Management approach 2016				
GRI 302: Energy 2016				
GRI 303: Water 2016				
GRI 305: Emissions 2016				
GRI 306: Effluents and waste				
GRI 307: Environmental compliance 2016				
103-1	Explanation of the material topic and its boundary	Comprehensive environmental management. Pg. 56		
103-2	The management approach and its components	Comprehensive environmental management. Pgs. 56 & 57		
103-3	Evaluation of the management approach	Comprehensive environmental management. Pgs. 56 & 58		
302-1	Energy consumption within the organization	Comprehensive environmental management. Pg. 59		7, 8, 9
303-1	Water extraction by source	Comprehensive environmental management. Pg. 59		7, 8, 9
303-3	Recycled and reused water	Comprehensive environmental management. Pg. 60		7, 8, 9
305-1	Direct GHG emissions (Scope 1)	Comprehensive environmental management. Pg. 60		7, 8, 9
305-2	Direct GHG emissions (Scope 2)	Comprehensive environmental management. Pg. 60		7, 8, 9
305-7	Nitrogen oxides (NOx), sulfur oxides (SOx) and other significant emissions into the air	Annexes -- Comprehensive environmental management. Pgs. 142 & 143		7, 8, 9
306-1	Water discharge according to its quality and destination	Annexes -- Comprehensive environmental management Pgs. 144, 145, 146, 147, 148 & 149		7, 8, 9
306-2	Waste by type and disposal method	Comprehensive environmental management. Pg. 61		7, 8, 9
307-1	Non-compliance with environmental legislation and regulations	Comprehensive environmental management. Pg. 63		



Annexes

Chapter 5 - Sustainability Context

(102-40) (102-43) (102-44)
Stakeholders

Stakeholder	Means of Relationship	Frequency of Relationship	Topic of interest
Shareholders	Shareholders' Assembly	Annually	<ul style="list-style-type: none"> Talent development and management Innovation for productivity Occupational health and safety Ethics, transparency and Corporate Governance Profitability and growth Risk Management
	Materiality dialogues	Every two (2) years	
	Board of Director Meetings	Four (4) times a year	
Employees	The <i>Bitácora</i> Newsletter Informe (Acrylic speakers)	Every fifteen (15) days	<ul style="list-style-type: none"> Talent development and management Cargo safety and integrity Occupational health and safety Innovation for productivity Relationship with clients Comprehensive environmental management
	<i>Conexión COMPAS</i> (a printed newsletter)	Quarterly	
	Physical bulletin boards	As needed	
	Intranet / Email	Permanently	
	Materiality dialogues	Every two (2) years	
	Follow-up meetings	As needed	
Clients	Materiality dialogues	Every two (2) years	<ul style="list-style-type: none"> Cargo safety and integrity Occupational health and safety Innovation for productivity Relationship with clients Comprehensive environmental management Ethics, transparency and Corporate Governance
	Communications (mailing)	As needed	
	COMPAS online (a digital newsletter)	Monthly	
	Webpage / Client portal	Permanently	
	Satisfaction survey	Annually	
	Follow-up meetings	As needed	
	Webpage / PQRS	Permanently	
Strategic allies	Materiality dialogues	Every two (2) years	<ul style="list-style-type: none"> Ethics, transparency and Corporate Governance Innovation for productivity
	Webpage	Permanently	
Suppliers	Materiality dialogues	Every two (2) years	<ul style="list-style-type: none"> Supplier management Comprehensive environmental management Ethics, transparency and Corporate Governance Social management Cargo safety and integrity Occupational health and safety
	Email	Permanently	
	Communications (mailing)	As needed	
	Follow-up meetings	As needed	
	Webpage / PQRS / Section of Supplier Service	Permanently	
Trade unions and authorities	Materiality dialogues	Every two (2) years	<ul style="list-style-type: none"> Comprehensive environmental management Ethics, transparency and Corporate Governance Social management Cargo safety and integrity Occupational health and safety Risk Management
	Reports and responses to requirements	As needed	
	Meetings to deal with common topics of interest	As needed	
Communities	Materiality dialogues	Every two (2) years	<ul style="list-style-type: none"> Comprehensive environmental management Social management Supplier management
	Follow-up meetings; Socialization of the Environmental Management Plan (Plan de Manejo Ambiental, PMA)	As needed	
	Email	Permanently	
	Webpage / PQRS	Permanently	

Chapter 5 - Talent development and management

(102-8)

General labor indicators

General labor indicators	2018						
	Headquarters	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú	Total Compas
Total number of employees	34	84	48	76	86	44	372
Total number of indefinite-period employees	31	71	44	65	59	41	311
Number of fixed-period employees	1	1	0	0	1	0	3
Number of employees with other types of contracts	2	12	4	11	26	3	58
Percentage of fixed-period employees	2,9%	1,2%	0,0%	0,0%	1,2%	0,0%	0,8%
Percentage of indefinite-period employees	91,2%	84,5%	91,7%	85,5%	68,6%	93,2%	83,6%
Total number of men	18	53	31	54	52	35	243
Total number of women	16	31	17	22	34	9	129
Percentage of men	52,9%	63,1%	64,6%	71,1%	60,5%	79,5%	65,3%
Percentage of women	47,1%	36,9%	35,4%	28,9%	39,5%	20,5%	34,7%
Employees in the Organization by labor category							
Level number 1: Executive	5	0	0	0	0	0	5
Level number 2: Managerial	6	1	2	1	1	1	12
Level number 3: Directors	6	5	0	1	1	0	13
Level number 4: Specialists	12	32	17	9	9	7	86
Level number 5: Other levels	5	46	29	65	75	36	256
TOTAL	34	84	48	76	86	44	372
Percentage level 1: Executive	14,7%	0,0%	0,0%	0,0%	0,0%	0,0%	1,3%
Percentage level 2: Managerial	17,6%	2,9%	5,9%	2,9%	2,9%	2,9%	3,2%
Percentage level 3: Directors	17,6%	14,7%	0,0%	2,9%	2,9%	0,0%	3,5%
Percentage level 4: Specialists	35,3%	94,1%	50,0%	26,5%	26,5%	20,6%	23,1%
Percentage level 5: Other levels	14,7%	135,3%	85,3%	191,2%	220,6%	105,9%	68,8%
Employees in the Organization by age							
Range number 1: Less than 30 years old	11	14	21	14	38	10	108
Range number 2: Between 30 and 40 years old	9	30	14	26	32	11	122
Range number 3: Between 40 and 50 years old	6	21	6	20	10	12	75
Range number 4: Between 50 and 60 years old	7	16	5	14	4	8	54
Range number 5: More than 60 years old	1	3	2	2	2	3	13
Percentage range 1: Less than 30 years old	32,4%	41,2%	61,8%	41,2%	111,8%	29,4%	29,0%
Percentage range 2: Between 30 and 40 years old	26,5%	88,2%	41,2%	76,5%	94,1%	32,4%	32,8%
Percentage range 3: Between 40 and 50 years old	17,6%	61,8%	17,6%	58,8%	29,4%	35,3%	20,2%
Percentage range 4: Between 50 and 60 years old	20,6%	47,1%	14,7%	41,2%	11,8%	23,5%	14,5%
Percentage range 5: More than 60 years old	2,9%	8,8%	5,9%	5,9%	5,9%	8,8%	3,5%

General labor indicators	2018						
	Headquarters	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú	Total Compas
Broken down by labor category							
Level number 1: Executive	5	0	0	0	0	0	5
Level number 2: Managerial	5	1	2	1	1	1	11
Level number 3: Directors	1	4	0	1	1	0	7
Level number 4: Specialists	4	14	11	5	4	4	42
Level number 5: Other levels	3	34	18	47	46	30	178
Percentage level 1: Executive	27,8%	0,0%	0,0%	0,0%	0,0%	0,0%	2,1%
Percentage level 2: Managerial	27,8%	5,6%	11,1%	5,6%	5,6%	5,6%	4,5%
Percentage level 3: Directors	5,6%	22,2%	0,0%	5,6%	5,6%	0,0%	2,9%
Percentage level 4: Specialists	22,2%	77,8%	61,1%	27,8%	22,2%	22,2%	17,3%
Percentage level 5: Other levels	16,7%	188,9%	100,0%	261,1%	255,6%	166,7%	73,3%
Broken down by age							
Range number 1: Less than 30 years old	6	4	8	5	17	6	46
Range number 2: Between 30 and 40 years old	4	18	11	19	23	6	81
Range number 3: Between 40 and 50 years old	1	15	5	16	7	12	56
Range number 4: Between 50 and 60 years old	6	13	5	12	3	8	47
Range number 5: More than 60 years old	1	3	2	2	2	3	13
Percentage range 1: Less than 30 years old	33,3%	22,2%	44,4%	27,8%	94,4%	33,3%	18,9%
Percentage range 2: Between 30 and 40 years old	22,2%	100,0%	61,1%	105,6%	127,8%	33,3%	33,3%
Percentage range 3: Between 40 and 50 years old	5,6%	83,3%	27,8%	88,9%	38,9%	66,7%	23,0%
Percentage range 4: Between 50 and 60 years old	33,3%	72,2%	27,8%	66,7%	16,7%	44,4%	19,3%
Percentage range 5: More than 60 years old	5,6%	16,7%	11,1%	11,1%	11,1%	16,7%	5,3%
Percentage level 5: Other levels	14,7%	135,3%	85,3%	191,2%	220,6%	105,9%	68,8%
Broken down by type of contract							
Total number of men with an indefinite-period contract	17	49	29	48	32	34	209
Total number of men with a fixed-period contract	1	0	0	0	0	0	1
Total number of men with other types of contracts (Specify the type of contract, such as Apprentices, Interns, etc.)	0	4	2	6	20	1	33

General labor indicators	2018						
	Headquarters	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú	Total Compas
Broken down by labor category							
Level number 1: Executive	0	0	0	0	0	0	0
Level number 2: Managerial	1	0	0	0	0	0	1
Level number 3: Directors	5	1	0	0	0	0	6
Level number 4: Specialists	8	18	6	4	5	3	44
Level number 5: Other levels	2	12	11	18	29	6	78
Percentage level 1: Executive	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
Percentage level 2: Managerial	6,3%	0,0%	0,0%	0,0%	0,0%	0,0%	0,8%
Percentage level 3: Directors	31,3%	6,3%	0,0%	0,0%	0,0%	0,0%	4,7%
Percentage level 4: Specialists	50,0%	112,5%	37,5%	25,0%	31,3%	18,8%	34,1%
Percentage level 5: Other levels	12,5%	75,0%	68,8%	112,5%	181,3%	37,5%	60,5%
Broken down by age							
Range number 1: Less than 30 years old	5	10	13	9	21	4	62
Range number 2: Between 30 and 40 years old	5	12	3	7	9	5	41
Range number 3: Between 40 and 50 years old	5	6	1	4	3	0	19
Range number 4: Between 50 and 60 years old	1	3	0	2	1	0	7
Range number 5: More than 60 years old	0	0	0	0	0	0	0
Percentage range 1: Less than 30 years old	31,3%	62,5%	81,3%	56,3%	131,3%	25,0%	48,1%
Percentage range 2: Between 30 and 40 years old	31,3%	75,0%	18,8%	43,8%	56,3%	31,3%	31,8%
Percentage range 3: Between 40 and 50 years old	31,3%	37,5%	6,3%	25,0%	18,8%	0,0%	14,7%
Percentage range 4: Between 50 and 60 years old	6,3%	18,8%	0,0%	12,5%	6,3%	0,0%	5,4%
Percentage range 5: More than 60 years old	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
Percentage level 5: Other levels	14,7%	135,3%	85,3%	191,2%	220,6%	105,9%	68,8%
Broken down by type of contract							
Total number of women with an indefinite-period contract	14	22	15	17	27	7	102
Total number of women with a fixed-period contract	0	1	0	0	1	0	2
Total number of women with other types of contracts	2	8	2	5	6	2	25

(Our Own)
Absenteeism

Absenteeism	2018						
	Headquarters	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú	Total Compas
Global absenteeism rate	17	31	20	29	17	13	127
Absenteeism rate of women	8	16	12	9	9	5	59
Absenteeism rate of men	9	15	8	20	8	8	68

(Our Own)
Diversity

Diversidad	2018						
	Headquarters	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú	Total Compas
Number of employees with disabilities in the template	0	0	0	0	0	0	0
Percentage of employees with disabilities in the template	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
Number of foreign employees in the Company who work in Headquarters or branches located in Colombia	2	0	0	0	0	0	2
Percentage of foreigners in the Company who work in Headquarters or branches located in Colombia	5,88%	0,00%	0,00%	0,00%	0,00%	0,00%	0,54%

(102-41)
Collective bargaining

Employees covered by collective bargaining	2016	2017						
		HQ	Cartagena	Barranquilla	Buenaventura	Aguadulce	Tolú	Total Compas
Total number of employees in the Organization	222	29	86	38	79	62	40	334
Total number of employees covered by collective bargaining	35	0	14	0	6	0	11	31
Percentage of employees covered by collective bargaining	16%	0%	16%	0%	8%	0%	28%	9%
Number of consultations or negotiations regarding changes in the Company	1	2						2

Employees covered by collective bargaining	2018						
	Headquarters	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú	Total Compas
Total number of employees in the Organization	32	72	44	65	60	41	314
Total number of employees covered by collective bargaining	0	13	0	6	0	10	29
Percentage of employees covered by collective bargaining	0%	18%	0%	9%	0%	24%	9%
Number of consultations or negotiations regarding changes in the Company							0

NOTA: For this indicator, only direct staff personnel are taken into account, without including interns, SENA students or temporary employees.

(202-1)

Relation of the internal minimum salary with the legal minimum salary in force

Relation between the internal minimum salary and the legal minimum salary in force	2016		2017		2018	
	Men	Women	Men	Women	Men	Women
Value of the legal minimum salary	No information		\$ 737.717	\$ 737.717	\$ 781.242	\$ 781.242
Value of the internal minimum salary			\$ 737.717	\$ 737.717	\$ 781.242	\$ 781.242
Ratio of the minimum salary			1	1	1	1

(202-2)

Proportion of top executives contracted from the local community

Executives from the local community in places where significant operations are carried out	2016	2017						
		HQ	Cartagena	Barranquilla	Buenaventura	Aguadulce	Tolú	Total Compas
Total number of top executives	No information	No information	No information	No information	No information	No information	No information	No information
Indicate the number of executives from the local community	13	11	1	2	1	2	1	18
Proportion of top executives contracted from the local community	No information	No information	No information	No information	No information	No information	No information	No information
Indicate the local conception	No information							

Executives from the local community in places where significant operations are carried out	2018						
	Headquarters	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú	Total Compas
Total number of top executives	11	1	2	1	1	1	17
Indicate the number of executives from the local community	10	1	2	1	1	1	16
Proportion of top executives contracted from the local community	91%	100%	100%	100%	100%	100%	94%
Indicate the local conception	from Colombia						

(401-1)

New hirings and employee rotation

	Withdrawals (2018)													
	Headquarters		Cartagena		Barranquilla		Cascajal		Aguadulce		Tolú		Total Compas	
	Withdrawals	Total employees	Withdrawals	Total employees	Withdrawals	Total employees	Withdrawals	Total employees	Withdrawals	Total employees	Withdrawals	Total employees	Withdrawals	Total employees
Total	2	32	6	72	3	44	10	65	7	60	4	41	32	314
Voluntary	1		3		0		7		2		3		16	

Employee rotation	2018						
	HQ	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú	Total Compas
Rate of employee rotation	6%	8%	7%	15%	12%	10%	10%
Rate of rotation from personnel for voluntary resignation	3%	4%	0%	11%	3%	7%	5%
Number of employees retired by mutual agreement	0	0	0	0	0	0	0
Number of deceased employees	0	0	0	0	0	0	0
Number of employees retired for pension or expiration of the contract	0	1	0	0	0	0	1
Number of employees transferred between Companies	0	0	0	1	2	0	3
Number of employees retired for voluntary resignation	1	3	0	7	2	3	16
Number of employees dismissed	1	2	3	2	3	1	12
Percentage of employees retired by mutual agreement	0%	0%	0%	0%	0%	0%	0%
Percentage of voluntary retirements / total number of retirements	50%	50%	0%	70%	29%	75%	50%

Retirements	2018						
	HQ	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú	Total Compas
Less than 30 years old	0	3	1	3	1	1	9
Between 30 and 40 years old	0	1	1	5	2	1	10
Between 40 and 50 years old	1	1	1	2	0	2	7
Between 50 and 60 years old	1	1	0	0	4	0	6
More than 60 years old	0	0	0	0	0	0	0
Women	1	4	0	2	2	2	11
Men	1	2	3	8	5	2	21

Rate of rotation among personnel, distributed by age and gender	2018						
	HQ	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú	Total Compas
Less than 30 years old	0%	50%	33%	5%	2%	25%	28%
Between 30 and 40 years old	0%	17%	33%	8%	3%	25%	31%
Between 40 and 50 years old	50%	17%	33%	3%	0%	50%	22%
Between 50 and 60 years old	50%	17%	0%	0%	7%	0%	19%
More than 60 years old	0%	0%	0%	0%	0%	0%	0%
Women	50%	67%	0%	3%	3%	50%	34%
Men	50%	33%	100%	12%	8%	50%	66%

Hirings by age	2018						
	HQ	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú	Total Compas
TOTAL	5	5	11	4	25	9	59
Less than 30 years old	2	2	4	1	11	4	24
Between 30 and 40 years old	2	3	3	3	10	3	24
Between 40 and 50 years old	1	0	3	0	2	2	8
Between 50 and 60 years old	0	0	1	0	1	0	2
More than 60 years old	0	0	0	0	1	0	1
Women	2	3	3	0	14	3	25
Men	3	2	8	4	11	6	34

Rate of hirings of personnel, distributed by age and gender	2018						
	HQ	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú	Total Compas
Less than 30 years old	40%	40%	36%	25%	44%	44%	40,7%
Between 30 and 40 years old	40%	60%	27%	75%	40%	75%	40,7%
Between 40 and 50 years old	20%	0%	27%	0%	8%	67%	13,6%
Between 50 and 60 years old	0%	0%	9%	0%	4%	0%	3,4%
More than 60 years old	0%	0%	0%	0%	4%	0%	1,7%
Female	40%	60%	27%	0%	56%	0%	42,4%
Male	60%	40%	73%	100%	44%	200%	57,6%
Total number and rate of hirings of employees	5	5	11	4	25	9	59
		2%	4%	1%	8%	3%	19%

Vacancies and promotions and seniority	2018						
	HQ	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú	Total Compas
Vacancies	5	5	11	4	25	9	59
Number of vacancies occupied by internal personnel	0	0	1	2	0	0	3
Percentage of vacancies occupied by internal personnel	0%	0%	9%	50%	0%	0%	5%
Global number of the template promoted during the last year	0	0	1	2	0	0	3
Global percentage of the template promoted during the last year	0%	0%	0%	1%	0%	0%	1%
Number of women of the template promoted during the last year	0	0	0	0	0	0	0
Percentage of women of the template promoted during the last year	0%	0%	0%	0%	0%	0%	0%
Number of men of the template promoted during the last year	0	0	1	2	0	0	3
Percentage of men of the template promoted during the last year	0%	0%	100%	100%	0%	0%	100%
Average seniority of the Company's employees promoted (years)	0,0	0,0	4,0	6,5	0,0	0,0	1,8
Average seniority of the Company's women promoted (years))	0,0	0,0	0,0	0,0	0,0	0,0	0,0
	0,0	0,0	4,0	6,5	0,0	0,0	1,8

NOTE: For this indicator, only direct staff personnel are taken into account, without including interns, *SENA* students or temporary employees.

(401-2)

Employee benefits

Mandatory social benefits for full-time employees	2016	2017						
		Headquarters	Cartagena	Barranquilla	Buenaventura	Aguadulce	Tolú	Total Compas
Do you have any of the following mandatory social benefits for all full-time employees?	Yes	Yes						
Social security	X	Yes						
Pension fund	X	Yes						
Others (specify) Severance pay fund Service bonus	X	Yes						
Mandatory social benefits for full-time employees		2018						
		Headquarters	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú	Total Compas
Do you have any of the following mandatory social benefits for all full-time employees?		Yes						
Social security		Yes						
Pension fund		Yes						
Others (specify) Severance pay fund Service bonus		Yes						

Voluntary social benefits for full-time employees	2016	2017						
		HQ	Cartagena	Barranquilla	Buenaventura	Aguadulce	Tolú	Total Compas
Do you have any of the following voluntary social benefits for all full-time employees?	Yes	Yes						
Life insurance	X	Yes						
Medical insurance	X	Yes						
Accident insurance		No						
Subsidies for health		Yes						
Subsidies for marriage		No						
Subsidies for food	X	Yes						
Vacation bonus	X	Yes						
Flexible working-day schedules		No						
Sponsorship for studies	X	Yes						
Shares		Yes						
Others (specify) Extra-legal bonuses (June and December); Bonuses (Bonus for year fulfilled; Bonus for climate and Bonus for results) Subsidy for Location Subsidy for Availability	No information	School kit; subsidy for illness; educational subsidy; subsidy for notary public expenses and registration to purchase a home with a Company loan; housing loan; loan to study languages						

Voluntary social benefits for full-time employees	2018						
	HQ	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú	Total Compas
Do you have any of the following voluntary social benefits for all full-time employees?	Yes						
Life insurance	Yes						
Medical insurance	Yes						
Accident insurance	No						
Subsidies for health	Yes						
Subsidies for marriage	No						
Subsidies for food	Yes						
Vacation bonus	Yes						
Flexible working-day schedules	No						
Sponsorship for studies	Yes						
Shares	Yes						
Others (specify) Extra-legal bonuses (June and December); Bonuses (Bonus for year fulfilled; Bonus for climate and Bonus for results) Subsidy for Location Subsidy for Availability	School kit; subsidy for illness; educational subsidy; subsidy for notary public expenses and registration to purchase a home with a Company loan; housing loan; loan to study languages						

(401-3)

Parental leave

Returning to work after a maternity or paternity leave of absence, broken down by gender	2016		2017													
			Sede adm.		Cartagena		Barranquilla		Cascajal		Aguadulce		Tolú		Total Compas	
	H	M	H	M	H	M	H	M	H	M	H	M	H	M	H	M
Employees who were entitled to a maternity or paternity leave of absence	0	3	1	0	2	2	0	0	0	0	0	0	0	0	3	2
Employees who enjoyed the maternity or paternity leave of absence	0	3	1	0	2	2	0	0	0	0	0	0	0	0	3	2
Employees who returned to work after completing their maternity or paternity leave of absence	0	2	1	0	2	1	0	0	0	0	0	0	0	0	3	1
Employees who continue in the Organization after 12 months of ending their maternity or paternity leave of absence	0	1	1	0	2	1	0	0	0	0	0	0	0	0	3	1
Rate of returning to work	No information		1		1	1									1	1
Rate of retention			1		1	1									1	1

(404-1) (412-2)

Training

Average annual hours of training by employee, broken down by gender and by labor category	2018						
	HQ	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú	Total Compas
Number of training hours Level 1 (Executive)	64	0	0	0	0	0	64
Number of training hours Level 2 (Managerial)	262	3	27	15	2	309	
Number of training hours Level 3 (Middle management)	53	275	0	18	0	346	
Number of training hours Level 4 (Specialist management)	590	2775	277	480	54	4176	
Number of training hours Level 5 (Operators)	0	652	108	848	335	1943	
Percentage of training hours Level 1 (Executive)	12,8	0,0	0,0	0,0	0,0	0,0	12,8
Percentage of training hours Level 2 (Managerial)	43,7	3,0	13,5	15,0	0,0	2,0	25,8
Percentage of training hours Level 3 (Middle management)	8,8	55,0	0,0	18,0	0,0	0,0	26,6
Percentage of training hours Level 4 (Specialist management)	49,2	86,7	16,3	53,3	0,0	7,7	48,6
Percentage of training hours Level 5 (Operators)	0,0	14,2	3,7	13,0	0,0	9,3	7,6
Number of training hours by gender (female)	381	1257	245	464	0	29	2376
Number of training hours by gender (male)	588	2448	167	897	0	366	4466
Percentage of training hours by gender (female)	23,8	40,5	14,4	21,1	0,0	3,2	18,4
Percentage of training hours by gender (male)	32,7	46,2	5,4	16,6	0,0	10,5	18,4
Total number of training hours	969	3705	412	1361	0	391	6838
Average training hours of the labor categories	193,8	741,0	82,4	272,2	0,0	78,2	1367,6
Average hours of training by employee	28,5	44,1	8,6	17,9	0,0	8,9	18,4
Number of employees who have received training in the last year	29	67	40	74	0	27	237
Percentage of employees who have received training in the last year	85%	80%	83%	97%	0%	61%	64%

Training in Human Rights policies or procedures and aspects of Human Rights relevant to operations	2018						
	HQ	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú	Total Compas
Number of employees trained	16	30	20	120	22	208	
Total number of hours dedicated to training	5	5	5	5	5	30	
Percentage of employees who received training	47%	36%	42%	158%	0%	50%	56%

(404-2)

Programs to improve employee skills and programs to help in the transition

Skills management and continuous training programs that promote the employability of workers and help them manage the end of their professional careers	2016	2017					
		HQ	Cartagena	Barranquilla	Buenaventura	Aguadulce	Tolú
Indicate the type and scope of the programs that have been carried out to improve employee capacities	Training program Strengthening technical and soft competencies	Training program Strengthening technical and soft competencies					
Describe the assistance programs aimed at promoting the employability and the management of the end of their professional careers, either through retirement or termination of the employment relationship	None	Activities were carried out with personnel close to retirement age; noteworthy is the labor history was reviewed and correction processes were initiated					

Skills management and continuous training programs that promote the employability of workers and help them manage the end of their professional careers	2018					
	Headquarters	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú
Indicate the type and scope of the programs that have been carried out to improve employee capacities	Strengthening technical and soft competencies for 100% of the Headquarter employees	Continuous training in English: 21 employees graduated, according to the level of the language required for specific positions, in addition to the training in technical and soft competencies	Training in technical and soft competencies for 100% of the employees at the terminal	Initiation of training in English for six (6) employees, according to the level of the language required for specific positions, in addition to the training in technical and soft competencies	Initiation of training in English for eight (8) employees, according to the level of the language required for specific positions, in addition to the training in technical and soft competencies	Training in technical and soft competencies for 100% of the employees at the terminal
Describe the assistance programs aimed at promoting the employability and the management of the end of their professional careers, either through retirement or termination of the employment relationship	We continue with support and guidance for employees close to retirement					

(404-3)

Employees who receive periodic performance evaluations and professional development

Percentage of employees whose performance and professional development are evaluated regularly, broken down by gender and professional category	2018						
	HQ	Cartagena	Barranquilla	Cascajal	Aguadulce	Tolú	Total Compas
Total number of employees in level 1	5	0	0	0	0	0	5
Number of performance evaluations carried out in level 1	5	0	0	0	0	0	5
Level 1: Executive							100%
Total number of employees in level 2	6	1	2	1	1	1	12
Number of performance evaluations carried out in level 2	6	1	2	1	1	1	12
Level 2: Managerial							100%
Total number of employees in level 3	6	5	0	1	1	0	13
Number of performance evaluations carried out in level 3	6	5	0	1	1	0	13
Level 3: Middle management							100%
Total number of employees in level 4	12	32	17	9	9	7	86
Number of performance evaluations carried out in level 4	0	0	0	0	0	0	0
Level 4: Specialist management							0%
Total number of employees in level 5	3	34	25	54	49	33	198
Number of performance evaluations carried out in level 5	0	0	0	0	0	0	0
Level 5: Operators							0%

NOTE: For this indicator, only direct staff personnel are taken into account, without including interns, SENA students or temporary employees.

(405-1)

Diversity in governing bodies and employees

Persons belonging to a governing body	2016					
	Men	Women	Less than 30 years old	Between 30 and 40 years old	Between 40 and 50 years old	Greater than 50 years old
Number of people in the Board of Directors	7	2	0	0	6	3
Percentage of people in the Board of Directors	78%	22%	0,0%	0,0%	67%	33%

Persons belonging to a governing body	2017					
	Men	Women	Less than 30 years old	Between 30 and 40 years old	Between 40 and 50 years old	Greater than 50 years old
Number of people in the Board of Directors	7	2	-	-	4	5
Number of people in the Board of Directors	78%	22%	0,0%	0,0%	44%	56%

Persons belonging to a governing body	2018						
	Men	Women	Less than 30 years old	Between 30 and 40 years old	Between 40 and 50 years old	Greater than 50 years old	Persons belonging to minority or vulnerable groups in the governing bodies
Number of people in the Board of Directors	8	1	1	1	2	5	-
Percentage of people in the Board of Directors	89%	11%	11%	11%	22%	56%	0,0%

(405-2)

Ratio of base salary and remuneration of women to men

Diversity in government bodies and employees

Persons belonging to a governing body	2016	2017	2018
Level 1: Executive (including the President)	1,24	N/A; there were no women in this level	N/A; there were no women in this level
Level 2: Managerial	1,44	1,16	0,88
Level 3: Middle management	1,14	5	1,21
Level 4: Specialist management	0,88	1,42	1,52
Level 5: Operators	1,22	1,25	1,24

Chapter 5 - Occupational health and safety

(403-1)

Representation of employees in formal employee-company health and safety committees

Representation of employees in joint (employee and management) health and safety committees	2016	2017	2018
Indicate the level at which the formal employee-company health and safety committees function within the Organization	All COMPAS, contractor and user employees	In COMPAS, employee representation in joint employee-company health and safety committees is provided through the Primary Occupational and Health and Safety Committee (Comité Paritario de Salud y Seguridad en el Trabajo, COPASST). There is a COPASST in each terminal. There is no COPASST in the headquarters.	In COMPAS, employee representation in joint employee-company health and safety committees is provided through the Primary Occupational and Health and Safety Committee (COPASST). There is a COPASST in each terminal. There is no COPASST in the headquarters.
The percentage of employees whose work or place of work is subject to control by the Organization and who are represented by formal employee-company health and safety committees	100%	91%	91%

(403-2)

Injuries, occupational diseases, lost days, absenteeism and number of fatalities - Employees

Injuries, occupational diseases, lost days, absenteeism and number of fatalities	Unit	2016		2017													
				HQ		Cartagena		Barranquilla		Buenaventura		Aguadulce		Tolú		Total Compas	
		H	M	H	M	H	M	H	M	H	M	H	M	H	M	H	M
	Employees																
Total number of employees	Number	160	62	15	14	52	34	24	14	59	20	37	25	32	8	219	115
Man-hours worked		No information		60504		176448		86130		210720		102515		95843		732160	
Total accidents	Number	2	0	0	0	0	0	0	1	0	0	4	2	5	1	9	4
Accident rate	Index	0,85		0	0	0	0	0	7,1	0	0	10,8	8	15,6	12,5	4,1	3,5
Frequency rate of accidents	Days	0,8		0		0		3		0		14		15		4	
Days of absence for accidents *	Index	15	0	0	0	0	0	0	3	0	0	14	8	64	2	78	13
Rate of days lost	Number	No information		0	0	0	0	0	21,4	0,0	0,0	37,8	32	200	25	32	5,2
Total occupational illness	Index	No information		0	0	0	0	0	0	0	0	0	0	0	0	0	0
Frequency rate of occupational illness	Days	No information		0	0	0	0	0	0	0	0	0	0	0	0	0	0
Days of absence for occupational illness *	Number	No information		0	0	0	0	0	0	0	0	0	0	0	0	0	0
Number of sick leaves for common illness	Days	128	N/D	0	2	14	11	10	5	42	11	6	8	7	4	79	41
Days of sick leave for common illness *	Index	771	N/D	0	5	94	98	39	9	469	39	26	20	44	11	672	182
Frequency rate of labor absenteeism for common illness	Number	No information		0	35,7	180,8	288,2	162,5	64,3	794,9	195,0	70,3	80,0	137,5	137,5	306,8	158,3
Fatalities	Number	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

2018													
HQ		Cartagena		Barranquilla		Buenaventura		Aguadulce		Tolú		Total Compas	
H	M	H	M	H	M	H	M	H	M	H	M	H	M
18	16	53	31	31	17	54	22	52	34	35	9	243	129
67584		178288		108035		204582		152845		104027		815361	
0	0	2	1	0	1	2	1	6	2	0	0	10	5
0	0	3,8	3,2	0,0	5,9	3,7	4,5	11,5	5,9	0,0	0,0	4,1	3,9
0		4		2		4		13		0		4	
0	0	18	5	0	4	7	1	18	6	365	0	408	16
0	0	34,0	16,1	0,0	23,5	13,0	4,5	34,6	17,6	1042,9	0,0	167,9	12,4
0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0
2	4	14	27	21	20	29	16	13	18	8	5	87	90
4	26	100	236	162	49	421	84	142	100	33	21	862	516
22,2	162,5	188,7	761,3	522,6	288,2	779,6	381,8	273,1	294,1	94,3	233,3	354,7	400,0
0	0	0	0	0	0	0	0	0	0	0	0	0	0

(403-2)

Injuries, occupational diseases, lost days, absenteeism and number of fatalities – Contractors

Injuries, occupational diseases, lost days, absenteeism and number of fatalities	Unit	2016		2017													
				HQ		Cartagena		Barranquilla		Buenaventura		Aguadulce		Tolú		Total Compas	
		H	M	H	M	H	M	H	M	H	M	H	M	H	M	H	M
	Contractor																
Total number of contractor employees	Number	No information		2	0	656	0	360	0	181	0	125	0	96	0	1420	0
Man-hours worked	Number	No information		4096		1717493		1036320		305124		393572		145892		3602497	
Total accidents	Number	19	0	0	0	16	0	8	0	1	0	0	0	0	0	25	0
Accident rate	Index	2,99		0	0	2,4	0,0	2,2	0,0	0,6	0,0	0,0	0,0	0,0	0,0	1,8	0
Frequency rate of accidents	Index	2,94		0		2		2		1		0		0		2	
Days of absence for accidents *	Days	138	0	0	0	122	0	29	0	3	0	13	0	2	0	169	0
Rate of days lost	Index	No information		0	0	18,6	0,0	8,1	0,0	1,7	0,0	10,4	0,0	2,1	0,0	11,6	0
Fatalities	Number	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

2018													
Headquarters		Cartagena		Barranquilla		Buenaventura		Aguadulce		Tolú		Total Compas	
H	M	H	M	H	M	H	M	H	M	H	M	H	M
4	0	706	0	380	0	123	0	188	0	165	0	1566	0
9844		1844521,5		1037972		234993		644708		222884		3994922,5	
0	0	13	0	6	0	2	0	4	0	0	0	25	0
0	0	1,8	0,0	1,6	0,0	1,6	0,0	2,1	0,0	0	0	1,6	0
0		2		1		2		1		0		2	
0	0	158	0	45	0	7	0	20	0	0	0	230	0
0	0	22,4	0,0	11,8	0,0	5,7	0,0	10,6	0,0	0,0	0,0	14,7	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0

Chapter 5 - Comprehensive environmental management

(305-7)

Nitrogen oxides (NOx), sulfur oxides (SOx) and other significant emissions into the air

Significant emissions into the air, in kilograms or multiples	Unit of measurement (kilograms or multiples)	2018									
		Cartagena			Barranquilla				Buenaventura		
		Point 1	Punto 2	Punto 3	Punto 1	Punto 2	Annually	Punto 3	Punto 1	Punto 2	Punto 3
Nitrogen Oxides (NOx)	ug/m3	0,92	1,24	1,37	0,93	1,08	0,92	1,03	0,98	0,81	2,67
Sulfur Oxides (SOx)	ug/m3	13,16	16,86	12,52	12,87	16,36	12,15	12,82	38,09	38,91	36,78
Particles (PM)	ug/m3	28,99	32,65	36,14	38,34	38,48	40,49	38,65	33,1	57,7	90,4
PST	ug/m3										
Other categories of emissions into the air, identified in regulations (CO)	ug/m3	1418,44	1423,81	1504,32					< 1140	< 1140	< 1140
NOTE: Persistent organic contaminants (PCO) are not measured											

2018					Indicate the legal regulation under which the measurement was made	Explain the source relative to the emission factors used	Explain what standards or methodology was used to make the calculation
Aguadulce		Tolú		Total Compas			
Estacion 1	Estacion 2	Punto 1 Compas	Punto 2 Cabaña el Maley				
1,3	0	1,01	1,35		Resolution 2254 of 2017		
10,5	7,4	15,49	17,05				
13,4	11,1	Point 1 COMPAS PM10, from January to July	Point 2 Cabaña el Maley PM10, from January to July		Resolution 2254 of 2017		
		42,34	45,41				
		40,58	40,73				
		40,22	40,08				
		44,34	43,49				
		41,93	40,15				
		41,46	44,91				
		Point 1 COMPAS PST from January to July	Point 2 Cabaña el Maley PST from January to July				
		67,29	67,76				
		73,23	72,87				
		70,45	69,37				
		71,74	68,09				
		72,51	66,9				
		68,52	69,15				
NOTE: Persistent organic contaminants (PCO) are not measured							

Chapter 5 - Integral environmental management

(306-1)

Water Discharge According to its Quality and Destination

Source of discharge (indicate the different points of discharge by the site), the percentage of operations evaluated in relation to corruption and the principal risks identified	Destination of discharge (body of water, sewer, etc.)	Volume discharged (m³)	Describe the characteristics of the treatment system	Indicate the quality of the discharge according to the following parameters:	
				DBO Permissible Limit (mg/l)	DBO Average Result (mg/l)
Headquarters	Discharged directly to the city sewers; therefore, there are no monitoring data of discharge to the network				
Cartagena	Sewer	Information is not available	N/A, as there are no treatment systems	75.0	236.9
Barranquilla	Body of Water		Primary Sedimentation Tank	50	43.2
Buenaventura	<i>Estero el Piñal</i>	984.0	For domestics, it has a septic tank with FAFA filters; for non-domestics, fat traps	90.0	94.6
Aguadulce		86.05			

Indicate the quality of the discharge according to the following parameters:						Indicate if the discharged water was reused by another organization	Description of the Procedure Used to Estimate the Discharge
DBO Permissible Limit (mg/l)	DBO Average Result (mg/l)	SST Permissible Limit (mg/l)	SST Average Result (mg/l)	Permissible Limit of Fats and Oils (mg/l)	Result of Fats and Oils (mg/l)		

Discharged directly to the city sewers; therefore, there are no monitoring data of discharge to the network

225.0	540.0	75.0	448.7	15.0	18.0	No	There are no discharges, since the wastewater is directed to septic tanks, where they are removed by a third party. Yes, there is a discharge to the sewer system, but at present, we are rethinking a pre-treatment before it is discharged to the sewer system.
150	111.0	50	323.0	10	<10	No	Compound samples were taken with aliquots every hour for four hours for three consecutive days.
90.0	140.8	90.0	55.8	20.0	27.8	No	In the monitoring, aliquots are taken every eight hours (this indicates the flow rate in l/s); then we pass to l/day and then multiply this by 365 to determine the volume for the year.
							The volume of wastewater delivered to the company responsible for cleaning the portable toilet units. In fresh water, no discharges are made to date.

Source of discharge (indicate the different points of discharge by the site), the percentage of operations evaluated in relation to corruption and the principal risks identified	Destination of discharge (body of water, sewer, etc.)	Volume discharged (m³)	Describe the characteristics of the treatment system	Indicate the quality of the discharge according to the following parameters:	
				DBO Permissible Limit (mg/l)	DBO Average Result (mg/l)
Tolú	Body of Water	The non-domestic wastewater has a treatment system; it is a system consisting of four Sedimentation Tanks at the end of the collector channels that cross the facilities from north to south, and discharge their waters to two (2) bodies of water, located in the El Manglar and the El Maley lots.	North Sedimentation Tank #1 – The Warehouse Patio	Rem > 80% in load. SM 5210 B, SM 4500-O G / 5d incubation and membrane electrode	736 mg/l
			North Sedimentation Tank # – The Plaster Material Patio	Rem > 80% in load. SM 5210 B, SM 4500-O G / 5d incubation and membrane electrode	50.5mg/l
			South Sedimentation Tank #1 – Coal Material Patio	Rem > 80% in load. SM 5210 B, SM 4500-O G / 5d incubation and membrane electrode	195 mg/l
			South Sedimentation Tank #2 – Slag Material Patio	Rem > 80% in load. SM 5210 B, SM 4500-O G / 5d incubation and membrane electrode	43,8 mg/l

Indicate the quality of the discharge according to the following parameters:						Indicate if the discharged water was reused by another organization	Description of the Procedure Used to Estimate the Discharge
DBO Permissible Limit (mg/l)	DBO Average Result (mg/l)	SST Permissible Limit (mg/l)	SST Average Result (mg/l)	Permissible Limit of Fats and Oils (mg/l)	Result of Fats and Oils (mg/l)		
Permissible Limit 50,000 mg/l		Permissible Limit 50,000 mg/l	343 mg/l	Permissible Limit 10,000 mg/l	<10.00 mg/l	N/A	The procedure was carried out under the concentrations of wastewater with the values established in the National Discharge Standard of Resolution Number 631 of 2015.
Permissible Limit 50,000 mg/l		Permissible Limit 50,000 mg/l	<6.0 mg/l	Permissible Limit 10,000 mg/l	12.1 mg/l	N/A	The procedure was carried out under the concentrations of wastewater with the values established in the National Discharge Standard of Resolution Number 631 of 2015.
Permissible Limit 50,000 mg/l		Permissible Limit 50,000 mg/l	9.6 mg/l	Permissible Limit 10,000 mg/l	11 mg/l	N/A	The procedure was carried out under the concentrations of wastewater with the values established in the National Discharge Standard of Resolution Number 631 of 2015.
Permissible Limit 50,000 mg/l		Permissible Limit 50,000 mg/l	6 mg/l	Permissible Limit 10,000 mg/l	< 10.0 mg/l	N/A	The procedure was carried out under the concentrations of wastewater with the values established in the National Discharge Standard of Articles 72 and 79 of Decree 1594 of 1984, temporarily in force, according to Article 76 of Decree 3930 of 2010 – Transition Regime.

Source of discharge (indicate the different points of discharge by the site), the percentage of operations evaluated in relation to corruption and the principal risks identified	Destination of discharge (body of water, sewer, etc.)	Volume discharged (m³)	Describe the characteristics of the treatment system	Indicate the quality of the discharge according to the following parameters:	
				DBO Permissible Limit (mg/l)	DBO Average Result (mg/l)
Tolú	N/A	Domestic sewage is treated through four (4) equal septic tanks, which have the following design characteristics: A 6,000-liter-capacity cylindrical tank (2 wells), two wells with a 10,000-liter capacity, and one 1,000-liter-capacity well located in the control center; they are manufactured in linear polyethylene of impact-resistant tin, with internal divisions that make up one (1) septic tank with two (2) chambers and a FAFA upflow anaerobic filter. These septic tanks are located: one (1) beside the casino; one (1) behind the office area; one (1) diagonal to the gate in the Plaster Patio; one (1) behind the Control Center Office, and the last one behind the new offices.	New Offices Septic Tank	Rem > 80% in load. SM 5210 B, SM 4500-O G / 5d incubation and membrane electrode	94,3 Mg/l
			Gate Septic Tank	Rem > 80% in load. SM 5210 B, SM 4500-O G / 5d incubation and membrane electrode	112 mg/l
			Workshop Septic Tank	Rem > 80% in load. SM 5210 B, SM 4500-O G / 5d incubation and membrane electrode	55,6 mg/l
			Casino Septic Tank	Rem > 80% in load. SM 5210 B, SM 4500-O G / 5d incubation and membrane electrode	189 mg/l

Indicate the quality of the discharge according to the following parameters:						Indicate if the discharged water was reused by another organization	Description of the Procedure Used to Estimate the Discharge
DBO Permissible Limit (mg/l)	DBO Average Result (mg/l)	SST Permissible Limit (mg/l)	SST Average Result (mg/l)	Permissible Limit of Fats and Oils (mg/l)	Result of Fats and Oils (mg/l)		
		Rem > 80% in load. SM 2540 D / Gravimetric – Dried at 103oC – 105oC	<6.0 Mg/l	Rem > 80% in load. SM 5520 D / Soxhlet Extraction	< 10.0 mg/l	N/A	The procedure was carried out under the concentrations of wastewater with the values established in the National Discharge Standard of Articles 72 and 79 of Decree 1594 of 1984, temporarily in force, according to Article 76 of Decree 3930 of 2010 – Transition Regime.
		Rem > 80% in load. SM 2540 D / Gravimetric – Dried at 103oC – 105oC	10 mg/l	Rem > 80% in load. SM 5520 D / Soxhlet Extraction	< 10.0 mg/l	N/A	The procedure was carried out under the concentrations of wastewater with the values established in the National Discharge Standard of Articles 72 and 79 of Decree 1594 of 1984, temporarily in force, according to Article 76 of Decree 3930 of 2010 – Transition Regime.
		Rem > 80% in load. SM 2540 D / Gravimetric – Dried at 103oC – 105oC	17 mg/l	Rem > 80% in load. SM 5520 D / Soxhlet Extraction	< 10.0 mg/l	N/A	The procedure was carried out under the concentrations of wastewater with the values established in the National Discharge Standard of Articles 72 and 79 of Decree 1594 of 1984, temporarily in force, according to Article 76 of Decree 3930 of 2010 – Transition Regime.
		Rem > 80% in load. SM 2540 D / Gravimetric – Dried at 103oC – 105oC	26 mg/l	Rem > 80% in load. SM 5520 D / Soxhlet Extraction	< 10.0 mg/l	N/A	The procedure was carried out under the concentrations of wastewater with the values established in the National Discharge Standard of Articles 72 and 79 of Decree 1594 of 1984, temporarily in force, according to Article 76 of Decree 3930 of 2010 – Transition Regime.

Chapter 5 - Corporate Governance

(102-18, 102-22, 102-23)

Composition of the Board of Directors

Aspects of the Board of Directors	Board Director Number 1	Board Director Number 2	Board Director Number 3	Board Director Number 4
Name	Gabriel Hernán Echavarría Obregón	Gonzalo Alvargonzález Figaredo	Edward Pallesen	Jonathan Hunt
Company where he or she works	Rosales S.A.	CEO ERSHIP SAU Vice President of the Spanish Shipowners (<i>Asociación de Navieros Españoles</i> , ANAVE), Madrid President of the Platform of Spanish Investors in Ports (<i>Plataforma de Inversores Españoles en Puertos</i> , PIPE), Madrid	Goldman Sachs' Merchant Banking	Goldman Sachs' Merchant Banking
Position	President	CEO	Managing Director and serves as head of the Americas for the Investment in Infrastructure Group (IIG)	Managing Director and serves as head of the Americas for the Investment in Infrastructure Group (IIG)
Executive / Non-Executive	Non-executive	Non-executive	Non-executive	Non-executive
Independent	No	No	No	No
Seniority in the Board	03/09/15	03/09/15	08/22/17	08/22/17
Other Board of Directors to which he or she belongs	<i>Fundación Natura</i> <i>Fundación Islas del Rosario</i>	<i>Grupo Ership/Alvargonzalez</i> <i>Dunas Capital/Inverseguros</i>	Vertical Bridge LLC Extenet Systems	<i>Red de Carreteras de Occidente</i> <i>Autopistas Metropolitanas</i> , Aviation Facilities Company (AFCO), <i>Avports</i>
Name of non-profit entities in which he or she participates as a member of the management bodies			Member of the Board of Directors of Henry Street Settlement, a non-profit organization based in New York; member of the University of Nebraska Foundation; and member of the Paul Engler institute for Agricultural Entrepreneurship	
Is he or she a shareholder of a major supplier or client?	No	No	No	No
Percentage of Board meetings attended vs. Board meetings held	100%	83%	100%	100%
Studies	University of Heidelberg, West Germany (1968); Junior Year at Columbia University, New York, USA (1969) B.A. Economics	Attorney - at - Law; Universidad Autónoma de Madrid Continuing Education Course (Diplomado) in Economic Sciences, Universidad Autónoma de Madrid	BA, <i>Summa Cum Laude</i> - Harvard University; Magna Cum Laude - Harvard Law School; Ph.M. and Ph.D. Oxford University	Bachelor's Degree in Political Studies; Dickinson College.

Board Director Number 5	Board Director Number 6	Board Director Number 7	Board Director Number 8	Board Director Number 9
Michael Obhof	Sebastián Echavarría Crespi	María Luz Salcedo	Romualdo Alvargonzález	Alejandro Echavarría Rodríguez
Goldman Sachs' Merchant Banking	Managing Partner of Sabricas Capital Management	Rosales S.A	President of <i>ERSHIP</i> , S.A.; Committee member of LLOYDS REGISTER; President of the <i>FUNDACIÓN ALVARGONZÁLEZ</i>	<i>Mensajeros Urbanos</i>
Vice President	Managing Partner	General Manager	President	President
Non-executive	Non-executive	Non-executive	Non-executive	Non-executive
No	No	No	No	No
08/22/17	08/22/17	08/22/17	08/22/17	08/22/17
<i>Autopistas Metropolitanas de Puerto Rico</i>	Corona Organization Falabella Colombia CAIS, CarSaver Compas S.A. Pérez Art Museum Miami and Henry Street Settlement Foundation, a non-profit organization based in New York	Rosales S.A.S. Central Charter de Colombia S.A.S. Playa Blanca Baru S.A.S. Promotora La Enseñanza S.A. Altos De Mdey. Hmv Ingenieros Ltda. Mejía Villegas S.A.	Patron of the Board of Directors of Real <i>Patronato del Museo Naval</i> BBVA Regional Counselor / Advisor Protective Member of the <i>Fundación Príncipe de Asturias</i> Counselor of various small companies	Pe SuperFuds Central Charter Colombia
	Member of the Henry Street Settlement Foundation Board of Directors			
No	No	No	No	No
83%	100%	0%	0%	0%
Bachelor's degree in Economics - Ohio State University; MBA - Massachusetts Institute of Technology (MIT), where he was a Graduate Teaching Assistant in Corporate Finances and Managerial Accounting	Bachelor's Degree in Political Science and History from Tufts University	Business Administrator - <i>Universidad Autónoma de Bucaramanga</i>	Bachelor's degree in Economic and Business Sciences - UNED	BS Economics - Northeastern University; BSIB Finance - D'Amore-McKim School of Business

Chapter 5 - Ethics, transparency and anti-corruption

(205-1)

Operations evaluated in relation to corruption risks

Total number and percentage of operations evaluated in relation to corruption risks and the main risks identified	2017			2018		
	Total operations	Operations evaluated	% Operations evaluated	Total operations	Operations evaluated	% Operations evaluated
	295	230	78%	319	319	100%

(205-2)

Communication and training on anti-corruption policies and procedures

Employees informed and trained	2018				
	Total employees	Employees informed		Employees trained	
		Number	%	Number	%
Managers	17	17	100%	10	59%
Administrative personnel	99	99	100%	80	81%
Others	256	256	100%	118	46%
Total	372	372	100%	208	56%

Chapter 5 - Social management

(Propio)

Amount of the social investment

Line of action	2014	2015	2016	2017	2018
Education	\$ 119.888.754	314.953.233	253.683.957	405.767.279	305.474.620
Water	\$ 224.341.969	214.690.779	20.700.599	600.000	60.700.000
Inclusive businesses	0	0	547.896.396	552.614.441	755.193.059
Others	299.137.609	148.311.324	85.545.338	125.127.221	118.776.868
TOTAL	\$ 643.368.332	\$ 677.955.336	\$ 907.826.290	\$ 1.084.108.941	\$ 1.240.144.547

Chapter 5 - Relationship with clients

(Propio)

Results of the satisfaction survey

General topic	Specific topic	2017	2018	Variation % 2017/2018
Statistical framework	Universe	72	143	99%
	Sample	48	104	117%
	% participation	67	86	28%
Satisfaction with the service received from Commercial management		96	98	2%
Attention received from COMPAS' Commercial management	Confidence conveyed by the commercial process	64	97	52%
	Advice and support provided to the businesses that your company develops	96	96	0%
	Follow-up on the service offered	96	93	-3%
	Attitude in service and kindness	98	96	-2%
	Timely solution to the concerns and/or requirements presented with the commercial service	91	91	0%
	Adequate and timely billing service	91	93	2%
Service received from the COMPAS Operating area	Responsible handling of your cargo	93	89	-4%
	Attention and agility received from the Documental Management area	93	89	-4%
	Advice on the operation	85	89	5%
Aspects related to the COMPAS response process to incidents	Timeliness in attending the incident	93	82	-12%
	Effectiveness of the solution offered	91	84	-8%
	Follow-up of your petition, complaint or claim	90	81	-10%
Aspects of COMPAS' Operative service	Infrastructure	76	94	24%
	Efficiency	85	91	7%
	Security	95	95	0%
	Lighting	0	91	
	Timely attention and solution to your requirements (a new question)		87	
	Detailed information on the service you are receiving (a new question)		90	
	Provision of communication services in the terminal (a new question)		89	
Value the client gives to the following COMPAS attributes	Agility in the provision of service	4,18	4,55	9%
	Quality in the service	4,6	3,96	-14%
	Client orientation	3,53	3,64	3%
	Port network	3,5	3,15	-10%
	Friendliness of the officials	3,13	3,11	-1%
	RSE	2,08	2,6	25%
Index of client satisfaction		84	89	6%

Chapter 5 - Supplier management

(308-2) (414-2)

Negative impacts in the supply chain

Environmental Impacts	2017	2018
Number of suppliers evaluated in relation to environmental impacts	31	24
Number of suppliers identified with possible negative environmental impacts	9	3
Number of suppliers identified with possible negative environmental impacts, with whom improvement plans have been agreed upon	9	3
Percentage of suppliers identified with possible negative environmental impacts, with whom improvement plans have been agreed upon	29%	13%
Number of suppliers identified with possible negative environmental impacts, with whom the contractual relationship was terminated	0	0
Percentage of suppliers identified with possible negative environmental impacts, with whom the contractual relationship was terminated	0%	0%
Potential significant negative environmental impacts that have been identified in the supply chain	(1) Rational, efficient use of water and energy (2) Inadequate disposal of solid waste and dumping of wastewater (3) Non-compliance of the legal requirements that apply to their activity	In general terms, the Supplier Environmental Management System must be reinforced, since the lack of administration and monitoring in the compliance of the requirements has been evidenced
Real significant negative environmental impacts that have been identified in the supply chain	(1) Absence of disposal certificates that guarantee the correct treatment of waste (2) Absence of licenses or operating permits from the environmental authority, such as obtaining the Environmental Management Plan, license or resolution for operation (3) Improper use of the color code in recycling	(1) Rational, efficient use of water and energy
Number of suppliers evaluated in relation to social impacts	31	24
Number of suppliers identified with possible negative social impacts	8	6
Number of suppliers identified with possible negative social impacts, with whom improvement plans were agreed upon	8	6
Percentage of suppliers identified with possible negative social impacts, with whom improvement plans were agreed upon	26%	25%
Number of suppliers identified with possible negative social impacts, with whom the contractual relationship was terminated	0	25%
Percentage of suppliers identified with possible negative social impacts, with whom the contractual relationship was terminated	0%	0%
Potential significant negative social impacts that have been identified in the supply chain	(1) Absence of policies and procedures for compliance with Human Rights (2) Absence of occupational safety and health indicators (3) Lack of provision of the necessary safety equipment to guarantee the safety of their employees	(1) Delay in the delivery of personal protection items to the supplier's employees (2) Inappropriate use of personal protection elements (PPE) (3) Non-compliance of periodic occupational medical examinations (4) Lack of training in high-risk tasks
Real significant negative social impacts that have been identified in the supply chain	(1) Absence of psychosocial risk assessment (2) Absence of diagnosis of health conditions of the working population (3) Non-compliance with social security payments (4) Lack of management in the provisions of Law 1072 of 2015 regarding SGSST (5) Lack of epidemiological surveillance and healthy lifestyle programs	(1) Delays in social security payments by the supplier (2) Irregularity in the hiring processes of employees (3) Absence of employees' health diagnosis (4) Absence of psychosocial risk assessment

Chapter 5 - Supplier management

(204-1)

Local suppliers

Expenditure on local suppliers	2016	2017	2018						
			Headquarters	Cartagena	Barranquilla	Buenaventura	Aguadulce	Tolú	Total compas
Percentage of the budget of acquisitions of locations with significant operations that is used on suppliers of the location of the operation (such as the percentage of products and services purchased locally).	99,90%	99,77%	100%	99,59%	99,73%	99,84%	97,51%	100%	99,445%
Geographic definition of the Organization for "local"	The term "local" has been defined as the acquisition of goods and services in the country: Colombia.								
Definition used for "locations with significant operations"	Significant operations correspond to the terminals and the Bogotá office								

(308-1) (414-1)

Selection of suppliers with environmental and social criteria

Election of suppliers	2016	2017	2018
Number of new suppliers	No information	No information	222
Percentage of new suppliers evaluated and selected according to environmental criteria		No information	0%
Percentage of new suppliers evaluated and selected according to social criteria		No information	0%



Acknowledgements

Acknowledgements

Management Report 2018

COMPAS thanks each and every one of the leaders and reporters of each of the Company's areas and processes, as well as the external contributors for their active participation in the development of this Management Report 2018.

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