

Human Rights Risks Matrix 2025-2028

Human Rights Matrix - RIMAC

Nº	Area	Topic	Related Risk	Related Human Right	Affected rightholder	Area that rated the risk
1	Health and Safety	Health and Safety	Possibility of workplace accidents affecting employees, suppliers or customers who are in the company's or its suppliers' facilities, due to the absence, insufficiency or non-compliance with safety protocols and emergency plans, which could lead to injuries, illnesses, psychological damage or even death	Right to life Right to health	Collaborators Suppliers Customers	Occupational Health and Safety Supplier management (administrative, health and vehicular) Customer experience
2	Health and Safety	Discrimination	Possibility of exclusion or limitation in the performance of activities of people with disabilities, due to the absence or inadequate accessibility conditions in physical spaces and digital platforms managed by the company and its suppliers, which could affect the right to health or loss of job opportunities	Rights of Persons with Disabilities Right to Equality and Non-Discrimination Right to Decent Work Right to Health	Collaborators Suppliers Customers	Wellness Supplier management (administrative, health and vehicle) Customer experience
3	Diversity & Inclusion	Discrimination	Possibility of acts of direct or indirect discrimination between employees, suppliers or customers on the basis of ethnic origin, gender, gender identity, sexual orientation, religion, political opinion, nationality, age, disability condition, socioeconomic status or other personal condition, caused by normalized behaviors that are not aligned with the culture, which could result in damage to dignity, psychological well-being, work environment and exclusion.	Right to Equality and Non-Discrimination Right to Decent Work Right to Health	Collaborators Suppliers Customers	Climate & Culture Supplier Management (administrative, health and vehicle) Customer Experience
4	Diversity & Inclusion	Sexual and/or Workplace Harassment	Possibility of sexual or workplace harassment (HSL) in person or digitally, due to lack of prevention mechanisms, reporting channels, action protocols, ignorance about HSL and the normalization of these acts, which could cause damage to the integrity, dignity and mental health of the affected people	Right to Life Right to Health and Personal Integrity	Collaborators Suppliers Customers Minority Communities	Labor Relations Culture and Climate Internal Audit
5	Labor Relations	Freedom of Expression	Possibility of restriction or sanctions against the free expression of opinions, needs or concerns by employees, suppliers or customers, due to authoritarian leadership and ineffective protection and declaration mechanisms, which could generate self-censorship, deterioration of the work environment and normalization and impunity of rights violations.	Right to freedom of expression	Collaborators Suppliers Customers	Labor Relations Supplier Management (administrative, health and vehicle) Customer Experience

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6	Labor Relations	Freedom of Association and Collective Bargaining	Possibility of impediment or impairment of the right to freedom of association and collective bargaining of supplier workers, due to direct or indirect anti-union practices imposed by suppliers, or lack of recognition of legitimate representatives, which could lead to violation of collective rights and disadvantageous working conditions.	Right to decent work Right to collective bargaining Right to association	Collaborators Suppliers	Supplier management (administrative, health and vehicular)
7	Talent Management	Discrimination	Possibility of acts of discrimination on the basis of ethnic origin, gender, gender identity, age, disability, nationality or other personal status in recruitment, selection and professional development processes – both in the company and in its suppliers – due to the application of subjective criteria, unconscious biases or the use of algorithmic tools without an equity audit, which could result in an unjustified exclusion of qualified persons, violation of the right to equal opportunities and harm to personal and professional development.	Right to equity Right to decent work	Collaborators Suppliers	Selection Development Supplier management (administrative, health and vehicular)
8	Talent Management	Working Conditions	Possibility of non-compliance with fair working conditions – remuneration, social benefits, working hours, health insurance, among others – by the company or its suppliers, due to weaknesses in contractual supervision, pressure to reduce costs or informality in the value chain, which could lead to job insecurity, impact on quality of life and violation of fundamental labor rights.	Right to decent work Right to health	Employees Suppliers	Labor Relations Supplier Management (administrative, health and vehicle)
9	Talent Management	Compensations	Possibility of wage gaps between men and women in the organization or its suppliers with similar levels of responsibility and experience, due to the absence of objective and transparent methodologies for job evaluation, periodic reviews of pay equity, the use of subjective criteria or unconscious biases, which could lead to remuneration discrimination and affect the right to equal pay for work of equal value.	Right to equity Right to decent work	Employees	Compensations Supplier management (administrative, health and vehicle)
10	Value Chain	Provision of Health Services	Possibility of harm to the physical or mental health of insured persons, and even death, as a result of deficient, negligent or untimely medical care by health service providers in the network, as well as weaknesses in the processes of evaluation and accreditation of the insured members' coverage, which could violate the right to life, health and access to quality services.	Right to health Right to life	Customers	Gestión de proveedores Salud
11	Value Chain	Supplier Management	Potential for adverse human rights impacts along the value chain—including modern slavery, violation of the use of personal data, or abusive working conditions—due to the absence or failure to comply with due diligence processes in the evaluation, selection, hiring, and monitoring of suppliers, and which could lead to business complicity in serious violations of fundamental rights.	Right to health Right to decent work Right to privacy Prohibition of slavery, forced labour and child labour	Collaborators Suppliers Customers Community	Supplier management (administrative, health and vehicular)

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Nº	Area	Topic	Related Risk	Related Human Right	Affected rightholder	Area that rated the risk
12	Insurance	Subscription	Possibility of exclusion or unjustified restriction in access to insurance products and services on the basis of age, pre-existing health condition, gender, sexual orientation, geographical location, nationality or socioeconomic status, due to the application of discriminatory underwriting criteria or unconscious biases, which could violate the right to health, the right to equality, consumer rights and access to financial protection	Right to health Right to equity Consumer rights	Customers	Health, Vehicular and Life product subscription
13	Insurance	Customer Experience	Possibility of personal or financial damage or uninformed decisions by policyholders, due to misinformation about the process among customers, as well as the delivery of incomplete, outdated, confusing or misleading information about products, coverage, exclusions and claim procedures, which could generate discomfort, frustration and the violation of their rights as consumers and personal losses	Right to truthful information Right to the consumer	Customers	Product Life Product Health Product P&C Companies Customer Experiencex Client Companies
14	Compliance	Reporting channels	The possibility that the reporting channel and complaint mechanisms are ineffective in reporting and managing human rights violations, due to the lack of accessibility, dissemination, complexity of procedures, absence of guarantees of confidentiality and non-retaliation, or language and technological barriers, which could lead to the normalization and impunity of improper conduct, as well as generate institutional distrust and revictimization.	Right to freedom of expression Right to privacy Right to protection of personal data	Collaborators Suppliers Customers Community Shareholders Status	Compliance Internal Audit Labor Relations
15	Information Security	Data Privacy	Possibility of exposure, loss, unauthorized access or improper use of personal data and sensitive health data of customers, collaborators and suppliers, due to vulnerabilities in information systems, non-compliance with cybersecurity protocols, human error or breaches in technology providers, which could cause damage to privacy, discrimination derived from the use of data, fraud and violation of the right to personal data protection.	Right to privacy Right to protection of personal data	Collaborators Suppliers Customers Community Shareholders Status	Information Security Data Privacy
16	Investments	Sustainable investments	Possibility of contribution or linkage to negative impacts on human rights and the environment – such as displacement of communities, pollution, deforestation or violation of labor rights – due to the absence or insufficiency of environmental, social and governance (ESG) criteria in the evaluation, approval and monitoring of the investment portfolio, which could generate complicity and reinforce violations of the fundamental rights of third parties and irreversible environmental damage.	Right to health Right to a healthy environment	Community	Investments Sustainability

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Nº	Area	Topic	Related Risk	Related Human Right	Affected rightholder	Area that rated the risk
17	Sustainability	Environmental Management	Possibility of environmental pollution and contribution to climate change derived from the company's operations – energy consumption, water use, waste generation, transport emissions – due to the absence or non-compliance with reduction targets, measurement systems and environmental management plans aligned with international standards, which could affect people's health and the right to a healthy environment.	Right to health Right to a healthy environment	Community	Sustainability
18	Sustainability	Human Rights Management	Possibility of human rights violations in the organization and its value chain, due to the lack of integration of the human rights policy into the corporate culture, insufficient or ineffective awareness, and the absence of monitoring indicators, which could lead to damage to people, reputational damage, and loss of stakeholder trust.	Right to life Right to health Right to equity Right to the consumer	Collaborators Suppliers Customers Community State Shareholders	Corporate Affairs Sustainability

02.

Risks Levels and mitigation and remediation actions



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Nº	Definition of Risk	Mitigation actions	Frequency	Impact	Risk level	Remediation Actions
1	Possibility of workplace accidents affecting employees, suppliers or customers who are in the company's or its suppliers' facilities, due to the absence, insufficiency or non-compliance with safety protocols and emergency plans, which could lead to injuries, illnesses, psychological damage or even death	1. IPERC Risk Matrix 2. Annual OSH Plan 3. OSH Policy 4. Awareness and training 5. OSH Committees 6. Emergency Response Manual (Brigadistas)	Frequent	Moderate	High	1. Immediate medical attention 2. Accident investigation 3. Deployment of corrective actions according to the accident 4. Tracking recovery and safe return
2	Possibility of exclusion or limitation in the performance of activities of people with disabilities, due to the absence or inadequate accessibility conditions in physical spaces and digital platforms managed by the company and its suppliers, which could affect the right to health or loss of job opportunities	1. AIS Certification 2. LEED Certification	Rare	Moderate	Medium	1. Identification of unsuitable conditions 2. Implement reasonable accommodations 3. Providing alternative care
3	Possibility of acts of direct or indirect discrimination between employees, suppliers or customers on the basis of ethnic origin, gender, gender identity, sexual orientation, religion, political opinion, nationality, age, disability condition, socioeconomic status or other personal condition, caused by normalized behaviors that are not aligned with the culture, which could result in damage to dignity, psychological well-being, work environment and exclusion.	1. Training and communications for employees 2. Human Rights and DEI Policy 3. Conduct Committee 4. Code of Conduct 5. Supplier Code of Conduct 6. Whistleblowing Investigator's Guide 7. Integrity Channel 8. DEI Committee 9. Alignment with Aequales	Frequent	Moderate	High	1. Protection against retaliation 2. Psychological support for the affected person 3. Corresponding disciplinary measures 4. Institutional apologies

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Nº	Definición del Riesgo	Acciones de mitigación	Frecuencia	Impact	Risk level	Remediation Actions
4	Possibility of sexual or workplace harassment (WPH) in person or digitally, due to lack of prevention mechanisms, reporting channels, action protocols, ignorance about WPH and the normalization of these acts, which could cause damage to the integrity, dignity and mental health of the affected people	1. Training and communications 2. HSL and DEI Policy 3. Conduct Committee 4. Code of Conduct 5. Workplace Sexual Harassment Committee 6. Integrity Channel	Frequent	Moderate	High	1. Protection against retaliation 2. Free psychological and medical support 3. Salary Advance for Affected Persons
5	Possibility of restriction or sanctions against the free expression of opinions, needs or concerns by employees, suppliers or customers, due to authoritarian leadership and ineffective protection and declaration mechanisms, which could generate self-censorship, deterioration of the work environment and normalization and impunity of rights violations.	1. Officevibe (work environment survey) 2. Feedback spaces 3. Complaints book 4. Labour Relations Mailbox 5. "Extraordinary Leaders" Program 6. Integrity Channel	Rare	Moderate	Medium	1. Training authoritarian leaders 2. Research and action as received in the Integrity Channel
6	Possibility of impediment or impairment of the right to freedom of association and collective bargaining of supplier workers, due to direct or indirect anti-union practices imposed by suppliers, or lack of recognition of legitimate representatives, which could lead to violation of collective rights and disadvantageous working conditions.	1. Human Rights Policy 2. Supplier Code of Conduct	Very rare	Minor	Low	1. Supplier Labor Practice Tracking Mechanisms

Matriz de Riesgos de Derechos Humanos - RIMAC

Nº	Definición del Riesgo	Acciones de mitigación	Frecuencia	Impacto	Nivel de riesgo	Acciones de Remediación
7	Possibility of acts of discrimination on the basis of ethnic origin, gender, gender identity, age, disability, nationality or other personal status in recruitment, selection and professional development processes – both in the company and in its suppliers – due to the application of subjective criteria, unconscious biases or the use of algorithmic tools without an equity audit, which could result in an unjustified exclusion of qualified persons, violation of the right to equal opportunities and detriment to personal and professional development	1. Awareness and training 2. Performance Evaluation Policy 3. Talent Management Journey 4. Individual Development Plan 5. Balance Scorecard	Very rare	Greater	High	1. Review of the affected process 2. Implementation of corrective measures in the selection or promotion process
8	Possibility of non-compliance with fair working conditions – remuneration, social benefits, working hours, health insurance, among others – by the company or its suppliers, due to weaknesses in contractual supervision, pressure to reduce costs or informality in the value chain, which could lead to job insecurity, impact on quality of life and violation of fundamental labor rights	1. Awareness and training 2. Broken down pay slips 3. Provider Enrollment Filters 4. Supplier approval 5. Benefits beyond what is required by law 6. Compensation Management PolicyInternal Regulations	Very rare	Moderate	Medium	1. Regularization of working conditions
9	Possibility of wage gaps between men and women in the organization or its suppliers with similar levels of responsibility and experience, due to the absence of objective and transparent methodologies for job evaluation, periodic reviews of pay equity, the use of subjective criteria or unconscious biases, which could lead to remuneration discrimination and affect the right to equal pay for work of equal value.	•1. Compensation Policy •2. Gender Pay Analysis and Indicators •3. DEI Policy	Rare	Moderate	Medium	1. Comprehensive review of remuneration scales 2. Strengthening of control mechanisms

Matriz de Riesgos de Derechos Humanos - RIMAC

Nº	Definición del Riesgo	Acciones de mitigación	Frecuencia	Impacto	Nivel de riesgo	Acciones de Remediación
10	Possibility of harm to the physical or mental health of insured persons, and even death, as a result of deficient, negligent or untimely medical care by health service providers in the network, as well as weaknesses in the processes of evaluation and accreditation of the insured members' coverage, which could violate the right to life, health and access to quality services	•1. Client Evaluation (Medical History) •2. Terms and Conditions •3. Insurance policies •4. Consultation/Emergency Center •5. RIMAC App •6. Contracts with health providers	Very rare	Greater	High	1. Immediate medical attention 2. Event Investigation 3. Compensation for damages
11	Potential for adverse human rights impacts along the value chain—including modern slavery, violation of the use of personal data, or abusive working conditions—due to the absence or failure to comply with due diligence processes in the evaluation, selection, hiring, and monitoring of suppliers, and which could lead to business complicity in serious violations of fundamental rights	•1. Supplier approval •2. Provider Enrollment Filters •3. Supplier Code of Conduct •4. Human Rights Policy	Very rare	Greater	High	1. Reparation for affected people 2. If it is a supplier, demand an adequate repair
12	Possibility of exclusion or unjustified restriction in access to insurance products and services on the basis of age, pre-existing health condition, gender, sexual orientation, geographical location, nationality or socioeconomic status, due to the application of discriminatory underwriting criteria or unconscious biases, which could violate the right to health, the right to equality, consumer rights and access to financial protection	•1. Client Evaluation (Medical History) •2. Terms and Conditions •3. Smart policies •4. Human Rights Policy •5. Complaints Book •6. Training and Awareness to FFVV	Very rare	Moderate	Moderate	1. Case Review

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Nº	Definición del Riesgo	Acciones de mitigación	Frecuencia	Impacto	Nivel de riesgo	Acciones de Remediación
13	Possibility of personal or financial damage or uninformed decisions by policyholders, due to misinformation about the process among customers, as well as the delivery of incomplete, outdated, confusing or misleading information about products, coverage, exclusions and claim procedures, which could generate discomfort, frustration and the violation of their rights as consumers and personal losses	•1. Terms and Conditions •2. RIMAC Store •3. Smart policies •4. RIMAC App •5. RIMAC Web •6. Training and Awareness for FFVV and Brokers	Possible	Moderate	High	1. Immediate correction of information 2. Priority attention
14	The possibility that the reporting channel and complaint mechanisms are ineffective in reporting and managing human rights violations, due to the lack of accessibility, dissemination, complexity of procedures, absence of guarantees of confidentiality and non-retaliation, or language and technological barriers, which could lead to the normalization and impunity of improper conduct, as well as generate institutional distrust and revictimization.	1. Awareness and training 2. Ethics Manual 3. Conduct Committee 4. Whistleblowing Management Policy 5. Anti-Corruption Policy 6. Whistleblowing Investigator's Guide 7. Reports to the Comprehensive Risk Committee 8. Integrity Channel managed by an independent third party	Very rare	Moderate	Medium	1. Protection against retaliation 2. Accompaniment to the affected person 3. Strengthening the mechanism and communicating improvements
15	Possibility of exposure, loss, unauthorized access or improper use of personal data and sensitive health data of customers, collaborators and suppliers, due to vulnerabilities in information systems, non-compliance with cybersecurity protocols, human error or breaches in technology providers, which could cause damage to privacy, discrimination derived from the use of data, fraud and violation of the right to personal data protection.	•1. Information Security Policy •2. Data Privacy Policy •3. Data Privacy Officer •4. Cybersecurity Risk Matrix •5. Simulations •6. Awareness and training •7. Restrictions on technological equipment	Very rare	Moderate	Medium	1. Immediate breach containment 2. Notification to affected persons and authorities where appropriate 3. Investigation of the incident; strengthening of controls and monitoring of those affected.

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Nº	Definición del Riesgo	Acciones de mitigación	Frecuencia	Impacto	Nivel de riesgo	Acciones de Remediación
16	Possibility of contribution or linkage to negative impacts on human rights and the environment – such as displacement of communities, pollution, deforestation or violation of labor rights – due to the absence or insufficiency of environmental, social and governance (ESG) criteria in the evaluation, approval and monitoring of the investment portfolio, which could generate complicity and reinforce violations of the fundamental rights of third parties and irreversible environmental damage.	•1. Investment Policy •2. Responsible Investment Policy •3. ESG Monitor •4. PIR Membership	Very rare	Moderate	Medium	1. Cancel that investment 2. Case Analysis and Investment Strategy Update
17	Possibility of environmental pollution and contribution to climate change derived from the company's operations – energy consumption, water use, waste generation, transport emissions – due to the absence or non-compliance with reduction targets, measurement systems and environmental management plans aligned with international standards, which could affect people's health and the right to a healthy environment.	1. Environmental Policy 2. Decarbonisation plan 3. Awareness and training 4. Climate Risk Management Policy 5. Climate risk analysis	Very rare	Minor	Low	1. Regularization of working conditions
18	Possibility of human rights violations in the organization and its value chain, due to the lack of integration of the human rights policy into the corporate culture, insufficient or ineffective awareness, and the absence of monitoring indicators, which could lead to damage to people, reputational damage, and loss of stakeholder trust.	•1. Human Rights Policy •2. Supplier Code of Conduct •3. Code of Conduct •4. Internal Regulations •5. Human Rights Risk Matrix	Rare	Moderate	Medium	1. Comprehensive review of the case to provide the corresponding measures