



CORPORATE SOCIAL
RESPONSIBILITY
POLICY



CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

Bridge Engineering and Construction Projects

CENTUNION GROUP

1. Introduction

CENTUNION is an international engineering and construction company specializing in the design and execution of transport infrastructure, including bridges and associated structures. The company has extensive experience in the development of turnkey projects in emerging markets.

This policy, integrated within the company's overall Compliance framework, establishes the principles and procedures through which CENTUNION manages the environmental, social, and governance (ESG) impacts arising from its bridge engineering and construction projects.

The objective of this policy is to ensure that projects not only comply with local regulations but also actively contribute to the sustainable development of the communities where they are implemented.

This policy is aligned with the Environmental and Social Framework (ESF) of the World Bank, which is widely used as an international reference for infrastructure projects financed by multilateral institutions.

2. Guiding Principles

Impact Prevention: All projects must identify environmental and social risks before the start of construction and throughout the different phases of project execution. Appropriate mitigation measures should be implemented, while also considering actions capable of generating positive environmental and social impacts.

Improvement of the Local Environment: Infrastructure projects should provide tangible benefits to local communities, such as improved mobility, better access to services, and new economic opportunities.

Participation and Transparency: Communities affected by the project must be informed and consulted throughout the project lifecycle, considering the impact the project may have on them during its various phases.

Environmental Protection: Construction activities must minimize disturbances to ecosystems, watercourses, and biodiversity.

3. Practical Examples of Responsible Practices

- Protection of rivers during bridge construction: installation of sediment barriers, use of elevated temporary platforms, and spill control measures to prevent water contamination.
- Dust management on construction access roads: regular watering of roads, speed limits for trucks, and covering of transported materials.
- Local employment: prioritizing the hiring of workers and suppliers from the region to promote local economic development.
- Community programs: rehabilitation of secondary roads, improvement of school access routes, construction of social infrastructure such as rest and recreation areas near bridges, or road safety awareness campaigns.
- Biodiversity protection: avoiding intensive construction work during breeding seasons of local species and maximizing the integration of new infrastructure within the natural environment.

4. Environmental and Social Management Plan (ESMP)

Each project shall include an Environmental and Social Management Plan (ESMP) defining specific measures to prevent, mitigate, and monitor environmental and social impacts.

The ESMP will include operational procedures, assigned responsibilities, monitoring indicators, and control mechanisms.

Example of measures included in an ESMP:

Activity	Potential Impact	Mitigation Measure	Responsible
Foundation excavation	River sedimentation	Install sediment barriers and monitor turbidity	Environmental Manager
Truck movement	Dust generation	Regular watering of access roads, placing of hoardings in work areas	Construction Supervisor
Fuel storage	Spill risk	Impermeable storage area with emergency spill kit	HSE Manager
Night works	Community disturbance	Limit construction working hours	Project Director

Activity	Potential Impact	Mitigation Measure	Responsible
Emission (equipment/vehicles)	Air pollution	Regular maintenance of machinery, use low-emission equipment, and monitor air quality	Equipment Manager/HSE Manager
Waste handling	Waste generation	Implement waste segregation, recycling, and proper disposal through licensed contractors	HSE Manager
Construction works	Site accidents	Provision of PPEs, toolbox meetings, safety inductions and trainings	HSE Manager
Material delivery / truck movement	Traffic disturbance	Traffic management plan, designated delivery schedule, and use of traffic marshals	Construction Supervisor

5. Stakeholder Engagement Plan (SEP)

The Stakeholder Engagement Plan (SEP) defines how stakeholders are identified, informed, and consulted throughout the project lifecycle.

- Local communities
- Municipal authorities
- Civil society organizations
- Infrastructure users
- Landowners

Consultations must take place prior to the start of the project and continue throughout its implementation.

Examples of engagement activities:

- Community meetings to explain the project and collect concerns.
- Participatory workshops with local leaders.
- Publication of project information in municipal offices.
- Periodic reports on construction progress.

6. Social Engagement Activities

- Employment creation
- Stakeholders Consultation
- Public Participation Forum
- Grievance Redress Mechanism
- Local businesses support
- Gender and People with Disability (PWD) inclusiveness
- Transfer of Technology/ Career Development

7. Grievance Redress Mechanism (GRM)

1. Receipt of complaint (email, community complaint box, or telephone line).
2. Registration in the project database.
3. Evaluation by the Social Manager.
4. Proposal of a solution and communication to the complainant.
5. Monitoring until the case is closed.

7. Project ESG Organization

Position	Responsibilities
Project Director	Overall supervision and compliance with standards
Environmental Manager	Implementation of the ESMP and environmental control
Social Manager	Community relations and grievance management
HSE Manager	Occupational safety and risk prevention
Compliance Officer	Anti-corruption controls and audits

8. ESG Performance Indicators

Category	Indicators
Environmental	Water quality, CO ₂ emissions, waste generated



Social	Percentage of local employment, number of community consultations, social infrastructure initiatives
Safety	Workplace accident rate, hours of safety training
Governance	Audits conducted, compliance with anti-corruption policies

9. Conclusion

In conclusion, **CENTUNION** is committed to conducting its business in a responsible, ethical, and sustainable manner. Through continuous engagement with stakeholders, responsible environmental practices, and meaningful contributions to the communities in which we operate, we aim to create long-term value for society while supporting sustainable development. This policy reflects our dedication to integrating social, environmental, and economic considerations into our operations, ensuring that our activities contribute positively to both present and future generations.