



Policy on Disclosure of Information



Grupo Energía Bogotá

PURPOSE

Grupo Energía Bogotá S.A. E.S.P., hereinafter GEB S.A. ESP, is committed to high standards of corporate governance and transparency, which have been compiled in the Corporate Governance Code and the Corporate Governance Policy. Such instruments are intended to ensure that in all Company actions, equitable treatment is given to all shareholders and other stakeholders.

Based on good practices of transparency and accountability, the Policy on Disclosure of Information, hereinafter the Policy, establishes general guidelines and commitments for the disclosure of financial and non-financial information of GEB S.A. ESP and Grupo Energía de Bogotá, hereinafter GEB. It also establishes mechanisms to provide shareholders and other stakeholders access to such information.

The purpose of this Policy is to establish, in line with GEB's corporate governance commitments, the general commitments that GEB S.A. ESP, as parent company of the Group and in its capacity of securities issuer in local and international markets, and all GEB companies, have taken on regarding the disclosure of information to stakeholders and the adoption of good practices regarding transparency.

SCOPE

This policy applies to GEB S.A. ESP and to all GEB companies, including the members of Boards of Directors, Management Councils and Directories (hereinafter, "Boards of Directors"), legal representatives, Vice-Presidents, Directors, Managers, Administrators, staff members of GEB S.A. ESP and other GEB companies¹

¹ For the effects of this policy, GEB companies are defined as subsidiaries in which GEB S.A. ESP holds an equity interest of 50% of more and exercises control over them.



STATEMENT OF COMMITMENT

- 1.** Information disclosure is the main mechanism through which GEB ensures transparency, ethics, accountability and respect for shareholder rights, and creates relationships based on trust with all its stakeholders.

GEB S.A. ESP shall disclose to its shareholders and stakeholders information that is classified as:

- a.** Financial information: financial statements and their attachments, economic performance, and general financial and accounting conditions, either permanent or exceptional, that is considered relevant information.
 - b.** Non-financial information: legal status, permanent or exceptional labor conditions, of a non-financial nature, that should be known by stakeholders and that is considered relevant information².
- 2.** Given its status of securities issuer, GEB S.A. ESP complies with information disclosure rules and requirements established by law, the guidelines issued by the Financial Superintendence of Colombia, the provisions of the Comprehensive Securities Market Information System (SIMEV, for the original in Spanish) and high local and international standards³ regarding transparency.
 - 3.** The financial and non-financial information disclosed by GEB S.A. ESP must be clear, timely, complete, truthful and accessible to shareholders, investors and other stakeholders, so as to ensure that they have access to adequate information in equal conditions on the performance of GEB S.A. ESP and GEB companies, to enable them to exercise their rights and make informed decisions.
 - 4.** In addition to the commitment of fulfilling high standards on information disclosure, GEB S.A. ESP and GEB companies must maintain due diligence in the treatment of information classified as proprietary or confidential.

² Definition based on Decree 2555/2010.

³ Investor Relations Society Guidelines.

Confidential or proprietary information is defined as any information that exclusively concerns the members of the Board of Directors, the CEO, Vice-Presidents and Directors, and the dissemination of which could put the business of GEB S.A. ESP or of GEB companies at risk, or affect third parties' rights or compromise the company's business strategies and competitiveness. All persons associated with GEB S.A. ESP or GEB companies shall handle information classified as confidential with extreme care, especially in the case of matters related to its competitive advantage and corporate strategy.

GEB S.A. ESP may refuse to deliver requested information when it is classified as proprietary and/or confidential information. Such refusal by the Company to provide information or clarification must be duly justified.

5. GEB S.A. ESP has several channels for disclosure of information, including:
 - a. Its website, which is the main mechanism for communicating stakeholders on a permanent basis. In accordance with applicable Colombian law⁴, the provisions of the Financial Superintendence and international standards, the website of GEB S.A. ESP shall disclose financial and non-financial information in clear and plain language, using graphics to effectively communicate the contents, and the information shall be continuously updated, all following the criteria of universality, proportionality and promptness, preserving in all cases any confidential or proprietary information.
 - b. Relevant information is disclosed through the platform of the Financial Superintendence of Colombia, the SIMEV system, in accordance with established regulations. Through this mechanism, GEB S.A. ESP discloses to the market in a truthful, clear, sufficient and timely manner any situations related to GEB S.A. ESP. and GEB that may be of interest to investors and other stakeholders.

Relevant information is defined as any information on GEB S.A. ESP that may affect the decisions of investors and other stakeholders. In this sense, the information that is disclosed on GEB S.A. ESP will be more detailed and extensive than the information related to other GEB companies, given that the relevant information on the latter refers only to information that is material⁵ for investors regarding the performance of such companies and GEB in general, to enable third parties to have an informed opinion on the reality, organization, complexity, business, size and governance model of GEB.

⁴ Law 1712/2014 or Law on Transparency, Chapter II of the single Circular Letter of the Colombian Securities Exchange, Circular Letter 028/2014 of the Financial Superintendence of Colombia, or any regulations that may amend them, among others.

⁵ "Material information is defined, for example, as that relating to corporate reorganization processes such as mergers, spin-offs, loans between parent companies and subsidiaries, assignments or transfers of assets, liabilities and others that may affect the issuer." Circular Letter 028/2014 of the Financial Superintendence of Colombia.

- c. The Financing and Investor Relations Department of GEB S.A. ESP is the channel that addresses specific inquiries by GEB S.A. ESP investors. Inquiries may be submitted to this department by phone, in writing to the physical address of GEB S.A. ESP, or by e-mail.
- d. Sustainable Management Report: In line with good practices and high sustainability and reporting standards, every year GEB S.A. ESP prepares and publishes a report following the methodology of the Global Reporting Initiative (GRI). This report presents to shareholders, investors and other stakeholders the overall results of GEB S.A. ESP and other GEB companies, including each company's operations. It therefore represents an important channel that consolidates information on the conditions and operations of GEB each year.
- e. Corporate Governance Annual Report: The Board of Directors reports to shareholders and the general public the operation of GEB's governance model and the main changes that have taken place during the year.

This report is complemented with the report on the implementation of the measures of the Financial Superintendence's Código País, which is published in the first quarter of each year. This report is submitted to the Superintendence and made available to shareholders, stakeholders and the general public through the website of GEB S.A. ESP.

PERSONS RESPONSIBLE FOR THIS POLICY

Fulfillment of this Policy is coordinated as follows:

1. The Board of Directors of GEB S.A. ESP approves the Policy and presents the Corporate Governance Annual Report.
2. The Audit and Risk Committee of the Board of Directors of GEB S.A. ESP ensures that the preparation, presentation and disclosure of financial information is performed adequately and is aligned with the provisions set forth herein and by law.
3. The Corporate Governance Committee recommends the approval of this Policy and any required amendments to the Board of Directors, verifies compliance with the policy on a semi-annual basis, and in general promotes access to complete, accurate and timely information disclosed by GEB S.A. ESP to shareholders and the market in general.

4. The primary spokesperson for the information referred to by this Policy regarding GEB S.A. ESP and GEB is the CEO of GEB S.A. ESP.
5. The Legal and Compliance Vice-Presidency, through the Corporate Affairs and Subsidiaries Department, is responsible for the publication of relevant information for the Financial Superintendence of Colombia in the SIMEV, in coordination with the Financing and Investor Relations Department, and it consolidates the Corporate Governance report of GEB companies and verifies the timeliness, quality and representativeness of the information to be disclosed. It is also responsible for providing advice to clarify any doubts that may arise on the nature of the information to be disclosed.
6. The Financing and Investor Relations Department of GEB S.A. ESP, or any area that takes over its duties, shall be responsible for identifying and assessing the relevance, scope and timeliness of the financial information to be disclosed by GEB S.A. ESP. It replies to shareholder inquiries and organizes events to present quarterly results aimed at investors and market analysts, which may be either face-to-face meetings or through electronic channels (tele-conferences, video-conferences, etc.), which are to be published in an event calendar, as well as the materials for tele-conferences on results, through the GEB S.A. ESP website. It also coordinates the disclosure of information on GEB companies.
7. The Communications Department publishes and updates information in the stakeholder communications channels, including the website, internal media and intervention events (dissemination of events, press conferences, etc.). It is responsible for the quality and integrity of the published information and must coordinate with the Corporate Affairs and Subsidiaries Department and the Legal and Compliance Vice-Presidency and the Financing and Investor Relations Department the publication of relevant information, once established internal procedures have been completed.
8. The IT Department of GEB S.A. ESP is responsible for technical maintenance of the infrastructure, the availability and hosting of the website, and for information security.
9. The Boards of Directors implement and ensure compliance with the Policy in their respective companies.
10. Every one of the employees of GEB S.A. ESP and of the GEB companies are responsible for the adequate preservation and protection of information classified as confidential according to the legal regime and internal GEB provisions.

This Policy replaces any previous provisions on this matter, and in particular CEO Decision No. 00000105 of 2008.