



ESG Program for Suppliers

GEB

GOVERNANCE

The highest decision-making body for ESG programs for suppliers at GEB is the **Board of Directors**.

1

The Board of Directors of GEB is the body that approves the Contracting Manual or any amendments made to it. For more information, please refer to the **CEO Contracting Manual, Decision No. 004 Considering: 1 Page 42**.

Contracting Manual:

<https://www.grupoenergiabogota.com/en/content/download/34003/file/Contracting%20and%20Execution%20Control%20Manual%20GEB%202021.pdf>

Rules of the Corporate Governance and Sustainability Committee

<https://www.grupoenergiabogota.com/gobierno-corporativo/estructura-de-gobierno/junta-directiva/comites-de-junta-directiva/comite-de-gobierno-corporativo-y-sostenibilidad>

2

The **Contracting Manual** contains a specific section on Sustainable Development Management. This section outlines the activities aimed at monitoring compliance with environmental and human rights obligations established in the contracts. Page 53

3

The Board of Directors of GEB has four supporting committees, specifically the Corporate Governance and Sustainability Committee, which is responsible for implementing ESG programs in the value chain. For more information, please review the **Rules of the Corporate Governance and Sustainability Committee** – Article 9 – Functions of the Committee: Review functions 15, 17, and 20.

General Contracting Clauses

General Compliance Clause: “Suppliers of Grupo Energía Bogotá, in addition to the regulations applicable to GEB, both nationally and internationally in matters of anti-corruption—including the prevention of transnational bribery, anti-money laundering, counter-terrorism financing, counter-financing of the proliferation of weapons of mass destruction, and the protection of personal data—are required to know and comply with, among others, the Code of Ethics and Conduct for Suppliers and Contractors of GEB and all other internal guidelines, including policies, procedures, and regulations aimed at preventing the aforementioned misconduct. It also commits to comply with the Sustainability and Human Rights Policies, as well as GEB’s Diversity and Inclusion Policy, or those that replace them or serve the same purpose.”

The General Contracting Clauses include the contractor’s obligations regarding:

- Management of respect, protection, and promotion of human rights. (Page 13)
- Compliance with legal requirements on occupational safety and health. (Page 12, subsection p)

For more information, please consult the General Contracting Clauses:

- GENERAL COMPLIANCE CLAUSE: Pages 22, 23, and 24
- CONFLICTS OF INTEREST, DISQUALIFICATIONS, AND INCOMPATIBILITIES: Pages 26 and 27
- COMMITMENT TO ETHICS: Page 26

www.grupoenergiabogota.com/content/download/35353/file/Clausulado+General+contrato+Consultori%CC%81a+y+PS+V6.pdf





Supplier Code of Conduct

1 The Code of Ethics and Conduct for GEB Suppliers provides information on how the Ethics Channel operates and states that suppliers are excluded from contracting if they cannot meet the minimum ESG requirements within an established timeframe.



Refer
to this.

[Code of Ethics – Grupo Energía Bogotá](#) – See CODE OF ETHICS AND CONDUCT FOR SUPPLIERS AND CONTRACTORS (1).pdf

2

It also states that failure to comply with the provisions of the Code of Ethics and Conduct for Suppliers and Contractors will result in the implementation of corrective plans by GEB, which may range from limitations on contracting with GEB for a specified period to termination of the respective contract or agreement for non-compliance.



Refer
to this.

[Code of Ethics – Grupo Energía Bogotá](#) – See CODE OF ETHICS AND CONDUCT FOR SUPPLIERS AND CONTRACTORS (1).pdf – Page 12



Supplier Code of Conduct

The Code of Ethics and Conduct for Suppliers and Contractors establishes in Section 12 (Pages 14, 15, and 16) “Penalties for Non-Compliance” the following: “Failure to comply with the provisions contained in this Code will result in the implementation of corrective plans by GEB. Repercussions may range from limitations on contracting with GEB for a specified period to termination of the respective contract or agreement for non-compliance. This is without prejudice to any civil, administrative, and/or criminal legal sanctions that may apply depending on the specific violation.”

This Code also establishes that GEB’s suppliers and contractors, “in addition to complying with applicable laws and regulations, must ensure respect for and promotion of human rights, protection and care of the environment, and the implementation of practices that foster fair and equitable labor relations.”



Refer
to this.

For more information, please refer to Pages 12, 13, 14, 15, and 16 of our Code of Ethics and Conduct for Suppliers at [Code of Ethics – Grupo Energía Bogotá](#) – See CODE OF ETHICS AND CONDUCT FOR SUPPLIERS AND CONTRACTORS (1).pdf

Progress in Purchasing Practices and Alignment with the Code of Conduct

These measures demonstrate GEB's strategic commitment to sustainable practices, aiming to positively impact the community and the operating environment.



In 2023, GEB strengthened the Rules of the Corporate Governance and Sustainability Committee, integrating the highest decision-making body on ESG matters throughout its value chain.

Additionally, in 2024, GEB aligned the Supplier Code of Conduct and introduced new obligations to mitigate ESG risks.



By 2024, sustainability criteria were integrated into the supplier selection process for both closed and open competitive procedures at GEB, with a vision for 2025 to expand these criteria to the contracting processes of at least four subsidiaries.

Contracting and Performance Control Manual – ESG Criteria

The Contracting and Performance Control Manual specifies that, for all contracts with GEB, individuals or legal entities must attach, if applicable, their Human Rights and Sustainability Policy.

They must also sign GEB's Sustainability and Human Rights Policy as an essential part of the contract, committing to comply with it. Violation of this policy constitutes grounds for the termination of any contractual relationship and exclusion from the supplier registry.

For more information, please refer to Page 53

<https://www.grupoenergiabogota.com/en/content/download/34003/file/Contracting%20and%20Execution%20Control%20Manual%20GEB%202021.pdf>

The Contracting Manual also outlines the guidelines for contractor evaluation and training.

For more information, please refer to Page 66

<https://www.grupoenergiabogota.com/en/content/download/34003/file/Contracting%20and%20Execution%20Control%20Manual%20GEB%202021.pdf>



1.7.2.3 Suppliers Are Excluded from Contracting If They Cannot Comply with the Minimum ESG Requirements

Supplier and Contractor Performance Evaluation Guide:

- At the Company, we review the Supplier and Contractor Performance Evaluation Guide to ensure alignment with the Supplier Code of Conduct and prevent potential conflicts with ESG standards.
- We also conduct periodic evaluations to ensure that the supplier or contractor complies with the obligations set forth therein. The evaluation is conducted according to the following rules:

TERM OF EXECUTION	ASSESSMENT
Less than or equal to six (6) months	A single evaluation will be made at the end of the term of execution, before the end of the term of the contract.
Over six (6) months	An evaluation will be carried out every six (6) months of performance, and a final evaluation will be made at the end of the term of execution, before the end of the term of the contract.

- GEB evaluates the performance of all its contractors in the provision of services or the quality of goods supplied. These evaluations are carried out at least once during the contract or every six months. The evaluation is based on six criteria: i) Technical compliance, ii) Administrative compliance, iii) Occupational safety and health compliance, iv) Environmental management compliance, v) CSR compliance, and vi) Quality compliance.
- At GEB, any supplier that obtains a score lower than 79 points in the performance evaluation, or lower than the maximum achievable score in the OSH evaluation, must submit an action plan to improve its performance.
- GEB carefully supervises and guides suppliers required to submit improvement plans. This ensures the full implementation of the plans, improved performance, and risk prevention during contract execution.

For more information, please refer to our **Supplier and Contractor Performance Evaluation Guide**

<https://www.grupoenergiabogota.com/conoce-geb/proveedores-y-contratistas/sostenibilidad-en-la-cadena-de-abastecimiento>

Sustainability Criteria in the Selection of Contractors

GEB integrated sustainability criteria into its procurement stages, promoting best practices to encourage current and future suppliers and contractors to adopt ESG (Environmental, Social, and Governance) aspects.



- The Sourcing and Services Management and the Sustainability and Communications Department are responsible for ensuring compliance.
- For contracting processes, during the planning stage, GEB will select two criteria from the Sustainability Criteria Library and include them as evaluable criteria in the supplier evaluation and selection processes. Bidders that meet the prioritized criteria will receive a higher score than those who do not meet them.
- *ESG criteria account **for 2%** of the bid evaluation*
- The goal for 2025 is to achieve the adoption of these criteria in at least four subsidiaries operating with the Shared Services Center.
- The Sustainability Criteria Library applies to the processes listed in the table below (hereinafter “applicable processes”) as weighted criteria in the bid evaluation.

Process	Service Category	Amount	Duration
Closed and open competitive contracting processes	According to the categories defined by the Sustainability area and the requesting areas, in accordance with the PACC lines for the corresponding year	All	More than 6 months

1.7.2.4 Sustainability Criteria in the Supply Chain

Sustainability Criteria in the Selection of Contractors

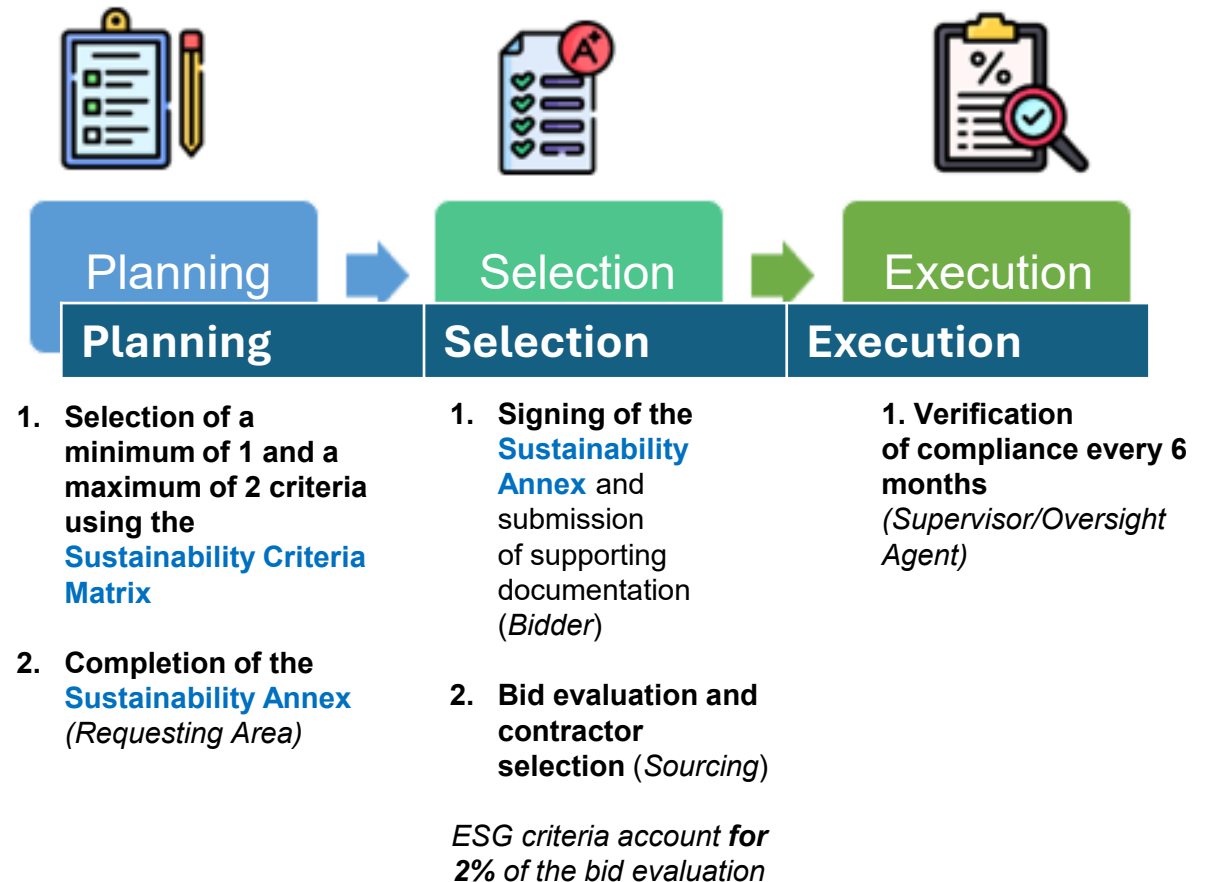
Type of criteria: Weighted criteria in the bid evaluation

Applicability: Open and closed competitive processes of any amount.

Sustainability Criteria Library



Stages



Training for Employees, Supervisors, and Oversight Agents for the Contracts

- At GEB, **employees** are responsible for requesting goods and services.
- In 2024, GEB's Auditing Management conducted 12 training sessions for 325 employees and 19 auditors on the following topics:
- **Procurement and Contract Execution Manual**
- **ESG Management**
- **Monitoring Environmental Obligations**
- **Human Rights**
- **Policy Compliance**

1.7.2.5 Training for Supervisory Employees



Capacitación presencial

Manual de contratación y Control de ejecución contractual

Desde la Gerencia Gestión de Interventoría queremos brindarte acompañamiento en el rol de Supervisor e Interventor, motivo por el cual, te invitamos a hacer parte de esta capacitación, para que tengas claridad de los procedimientos y gestiones que realizas en la ejecución y terminación del contrato o convenio a cargo.

Contenido

1. Lineamientos del Manual de contratación
2. Determinación y asignación
3. Actos preparatorios
4. Ejecución
5. Terminación y Liquidación



Jueves
28 de Noviembre



Hora:
9:00 a.m.
a 1:00 p.m.



Lugar:
Sede Calle 73
Sala 510

Mejoramos vidas con energía sostenible y competitiva



Gerencia Gestión de
Interventoría

Process for Identifying Significant Suppliers Based on ESG Risks

As a complement to our supplier program, during 2024, we began developing and implementing a program to assess the significance of contractors and suppliers based on ESG risks and the leverage this group can present.

This process was designed using a case study presented by our subsidiary TGI. It involved a systematic analysis of risks identified in 20 suppliers, pinpointing 12 ESG risks. When correlated with leverage (expenditure volume, operational criticality, and the nature and duration of the relationship), this analysis allowed us to build a matrix that segments supplier significance into four categories: Minimal, Specialized, Moderate, and Priority.

As a result, this led to the development of a process for identifying supplier significance using the ESG risk matrix:

Significance Process



Supplier Sample Selection

1. Four suppliers from different categories were selected to assess their associated ESG risks.

No.	Company
1	ESCALAR INGENIERÍA SAS
2	PETRO GAS DEL LLANO S.A.S
3	ING CONS S.A.S
4	PETRO GAS DEL LLANO S.A.S
5	SHANDONG KERUI PETROLEUM EQUIPMENT CO. L
6	HNA INGENIERIA S.A.S
7	ORGANIZACION TERPEL SA
8	RELIABILITY MAINTENANCE SERVICES SA
9	INLINE FLUID SYSTEMS S.A.S
10	NUEVA ITALTEL COLOMBIA SAS
11	SIGNUM INGENIERIA SAS
12	SOFORESTA SAS
13	SIGNUM INGENIERIA SAS
14	NEOSECURE COLOMBIA S.A.S
15	I2 SISTEMAS Y SEGURIDAD INFORMATICA LTDA
16	CONSULTORIA Y GESTION AMBIENTAL S A S BIC
17	ORIGIN IT SAS
18	TEKQUIMICA S.A.S
19	EXTINTORES METALES Y EQUIPOS FULL AC SAS
20	SCHNEIDER DE COLOMBIA S A
21	CAIA INGENIERIA SAS
22	LATAMFUV
23	CONSULTORIA Y MEDIO AMBIENTE S.A

24	PROYECTOS GESTION CAPACITACION Y CALIDAD
25	HNA INGENIERIA S.A.S.
26	CAIA INGENIERIA SAS
27	ISOLUCION SISTEMAS INTEGRADOS DE GESTION S.A.
28	BSD CONSULTING S.A.S.
29	COMERCIALIZADORA BECOR SA
30	CONSULTORIA GP SAS
31	TECH PRO SERVICES SAS
32	CONSULTECH ASESORES S.A.S.
33	PRECINTOSLASER S.A.S.
34	DELOITTE ASESORES Y CONSULTORES SAS
35	LIXIS DE COLOMBIA SAS
36	CROIL SERVICIOS E INGENIERIA SAS
37	CAIA INGENIERIA SAS
38	OLIMPIA IT SAS
39	DATA KNOW S.A.S.
40	IMOCOM SAS
41	ATLAS COPCO COLOMBIA LTDA
42	MORKEN COLOMBIA SAS
43	FERRETERIA REINA S.A
44	SMART INSTRUMENTS SAS
45	PUFFER COLOMBIA

2. We received 20 responses from our suppliers for analysis.

No.	Company
1	RHEMA INTERNACIONAL SAS
2	CONSULTECH ASESORES SAS
3	INCOPAV SAS
4	INTRANS SAS
5	ESCALAR INGENIERIA SAS
6	PETRO GAS DEL LLANO SAS
7	CORPORACION CDT DE GAS
8	APLYCA TECNOLOGIA SAS
9	MORKEN COLOMBIA SAS
10	RELIABILITY MAINTENANCE SERVICES SA (RMS SAS)
11	INGENIERÍA TRITURADOS Y CONCRETOS SA (INTRICON SA)
12	ORIGIN IT SAS
13	ING CONS SAS
14	HNA INGENIERIA SAS
15	SIGNUM INGENIERIA SAS
16	CAIA INGENIERIA SAS
17	EXTINTORES METALES Y EQUIPOS FULL AC SAS
18	TECH PRO SERVICES SAS
19	PUFFER COLOMBIA
20	SOFORESTA SAS

Questions by ESG category sent to suppliers

Category	Number of Questions
I. Governance	15
Strategic Management	5
Ethics and Transparency	3
Whistleblower Channels	1
Compliance	2
Supply chain	4
II. Social	8
Strategic Management	3
Labor Relations and Discrimination	4
Occupational Safety and Health	1
III. Environmental	10
Environmental Risk and Impact Management	2
Climate Change	3
Water	2
Solid Waste	2
Biodiversity	1

ESG Risks Identified

Environmental	Risk of Contributing to Climate Change	Sector-specific risk
	Risk of Impact on Water Resources	
	Risk of Impact on Soil	Specific risk of raw materials
	Risk of Impact on Biodiversity and Ecosystems	
Governance	Risk of Ethics and Corruption	Country-specific risk
	Risk of Money Laundering and Terrorist Financing	

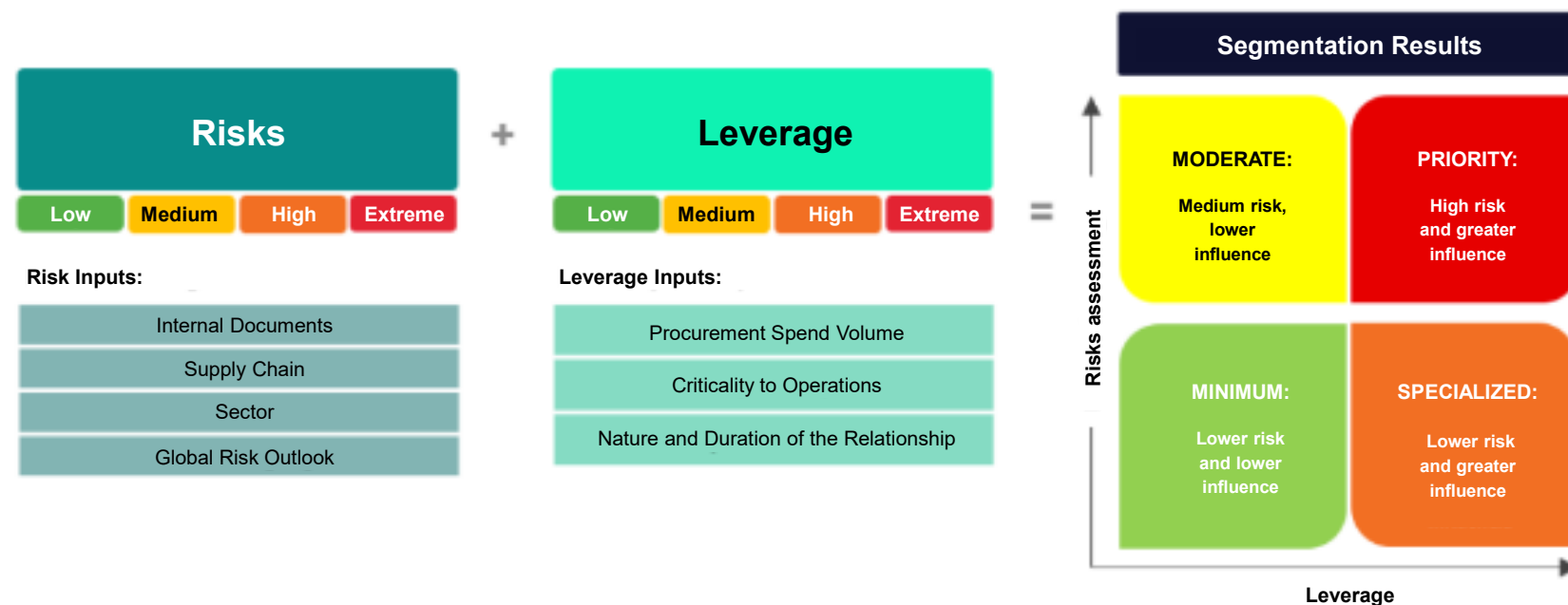
Social	Risk of Workplace Harassment	Country-specific risk
	Risk of Impact on Fair Labor Conditions	
	Risk of Impact on Access to Information for Local Communities	
	Risk of Impact on the Right to Privacy and Use of Information	
	Risk of Child Labor	
	Risk of Discrimination	

Supplier Segmentation Analysis

Segment	Definition
Minimum	Suppliers and contractors in this segment pose lower ESG risks. This is due to the assessed level of management and their relatively low criticality. TGI has limited influence to drive change in their practices. However, given their low to medium criticality, TGI's investment to improve ESG management in these cases is minimal.
Moderate	The supplier in this segment presents higher ESG risks based on the evaluated management level. However, these suppliers may or may not interact with TGI due to their corresponding criticality level. It's important for TGI to increase the level of ESG risk management for these suppliers, which will require a moderate financial investment in specific risk management interventions.
Specialized	Suppliers and contractors in this segment have lower ESG risks due to the evaluated management level. This segment is the most relevant for TGI in terms of proactive risk management, and where there's the greatest influence to drive change and achieve positive management impacts.
Priority	Suppliers and contractors in this segment have higher exposure to ESG risks due to the evaluated management level, posing a serious and urgent threat to TGI. Therefore, these suppliers require priority investment in higher-impact and more intensive activities. It's crucial to improve ESG management for suppliers in the extreme segment, moving and maintaining them in the high segment.

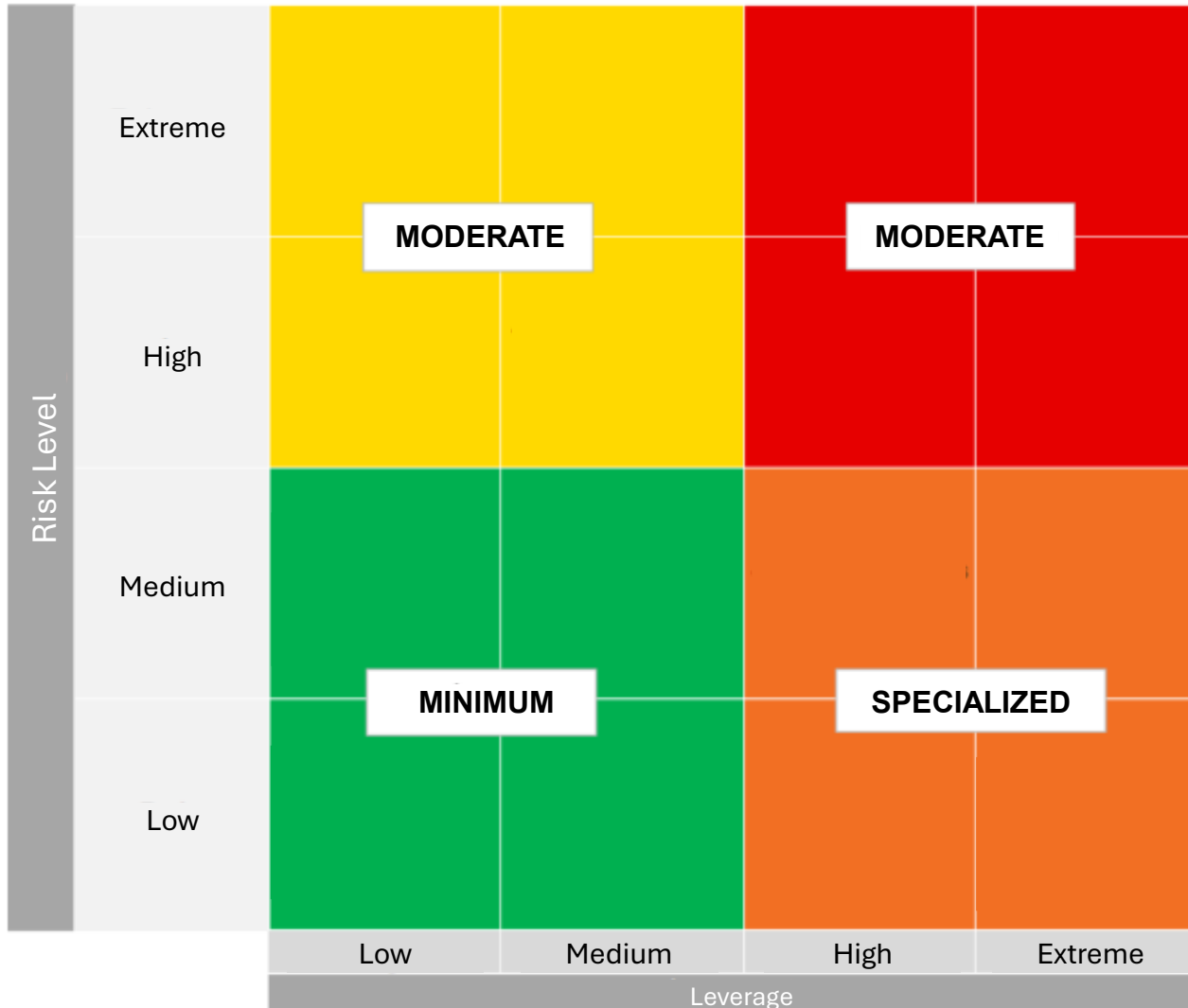
Supplier Segmentation Analysis

Figure 1. LRQA Methodology and Segmentation Model



Risk Matrix for Identifying Significant Suppliers

Figure 7. General segmentation of TGI suppliers



<p>Minimum Segment</p> <p>Suppliers that have low or medium leverage for TGI and whose ESG risk assessment places them between a low and medium risk level.</p> <p>The results of the segmentation show that 30% of the suppliers in the sample are in the Minimum category. These suppliers present lower risk and relative strategic importance for TGI, linked to the support they provide in the supply of goods and services.</p>
<p>Moderate Segment</p> <p>Suppliers that have low or medium criticality for TGI and whose ESG risk assessment places them between a high and extreme risk level.</p> <p>The results of the segmentation show that 25% of suppliers are at the Moderate level, which implies a risk level between high and extreme due to poor corporate governance risk management.</p> <p>However, these suppliers do not have high leverage for TGI's operations. They are classified as Moderate because, despite their high risk exposure, TGI has a low level of leverage with them. This means they are not strategic or highly dependent for the sustainability of the business.</p>
<p>Specialized Segment</p> <p>Suppliers that have high or extreme leverage for TGI and whose ESG risk assessment is between medium and low risk levels.</p> <p>This segment includes 30% of TGI's suppliers. The Specialized Segment is the most important for TGI because the ESG risk level is low or medium, while their level of influence is high or extreme. Additionally, the relationship with these suppliers is critical due to their leverage with TGI.</p>
<p>Priority Segment</p> <p>Suppliers that have high or extreme leverage for TGI and whose ESG risk assessment is classified as high or extreme.</p> <p>Fifteen percent of TGI's suppliers have poor management of ESG-related matters, combined with the impact of their services on operations. Consequently, these companies require priority attention, and their relationship cannot be limited without first investing in both the supplier and TGI, not only to manage risk but also because the probability that risk management among these suppliers will have the greatest impact on TGI is significantly higher.</p>

Source: Information from the document "Sourcing Management – TGI Supplier Classification"

Information/Training for Suppliers on the Program, the Process, and the ESG Requirements for Company Suppliers

- As GEB, we are committed to providing ongoing training to our suppliers and contractors on topics that enable us to continue aligning all our operations with our policies, particularly those that prioritize human rights and ESG criteria.
- Our calls for proposals are open to all our suppliers and contractors, and we always seek to generate value in our supply chain.



Taller debida diligencia Derechos Humanos

En el Grupo Energía Bogotá, todas nuestras actividades están guiadas por el principio de acción sin daño y por lineamientos que garantizan el respeto por la vida y por los derechos de las personas.

La debida diligencia en Derechos Humanos es un componente esencial de nuestra operación que busca identificar, evaluar y gestionar los impactos que nuestras actividades pueden tener en los derechos de comunidades y otros grupos de interés.

En este taller la Academia GEB te invita fortalecer tus conocimientos frente a la debida diligencia y como aplicar el enfoque en derechos humanos en las actividades de relacionamiento con comunidades.

Jaime Uribe, es consultor de la Oficina del Alto Comisionado de las Naciones Unidas para los Derechos Humanos en Colombia y ganador del Robert F. Kennedy Human Rights Award.

Ivan Numpaka, Director de proyectos de Business and Human Rights, +20 años de experiencia liderando estrategias de derechos humanos y sostenibilidad corporativa.

11 de abril
7:45 a.m. a 12 p.m.
Riohacha

Taller debida diligencia Derechos Humanos

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18 de abril
7:45 a.m. a 12 p.m.
Pereira

Taller debida diligencia Derechos Humanos

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Ivan Numpaka, Director de proyectos de Business and Human Rights, +20 años de experiencia liderando estrategias de derechos humanos y sostenibilidad corporativa.

4 de abril
2:00 p.m. a 5:00 p.m.
Edificio Calle 73

Information/Training for Suppliers on the Program, the Process, and the ESG Requirements for Company Suppliers

- Committed to generating the greatest benefit for our supply chain, we constantly open spaces for our suppliers and contractors to receive training, in partnership with educational institutions and associations.
- Together with Universidad de los Andes, we launched the course “Lead the Change!”, in which 41 contractors from GEB and its subsidiaries participated.
- 55% of participants increased their knowledge of sustainability, achieving a final average grade of 4.5 (compared to an initial average grade of 2.9)
- As a complement to our program, we hold an annual recognition gala for contractors and suppliers, a space where good practices are highlighted and additional training is provided on strategic topics to address the challenges of the coming year.



¡LIDERA EL CAMBIO!
Y TRANSFORMA TU EMPRESA
HACIA LA SOSTENIBILIDAD
ESTRATÉGICA!

El Grupo Energía Bogotá invita a sus contratistas a participar en el
Curso de Sostenibilidad Estratégica, certificado por la Universidad de los Andes.
¡Queremos que nuestra cadena de suministro alcance los más altos estándares en sostenibilidad!

¡Cupos limitados!
1 cupo por empresa

Perfil participante: líderes de sostenibilidad o de estrategia empresarial, con capacidad de movilizar la estrategia de sostenibilidad al interior de su empresa
Duración: 9 horas
Formato: 5 clases virtuales sincrónicas

Módulo 1	Módulo 2	Módulo 3
Entendiendo la sostenibilidad corporativa	Derechos Humanos, diversidad, equidad e inclusión	Cambio Climático
Clase 1: Retos, tendencias, exigencias de mercado 29 de octubre 8:00 a 9:30 a.m.	Clase 2: Derechos humanos y empresas 1 de noviembre 8:00 a 10:00 a.m. Clase 3: Diversidad, equidad e inclusión 8 de noviembre 8:00 a.m. a 9:30 a.m.	Clase 4: Cambio climático 15 de noviembre 8:00 a 10:00 a.m. Clase 5: Medición huella de carbono 22 de noviembre 8:00 a 10:00 a.m.


Para obtener la certificación de la Universidad de los Andes es imprescindible asistir a al menos 80% del curso y responder las evaluaciones correspondientes a cada módulo.

Fecha límite de inscripción: 4 de octubre

Inscríbete aquí

Para información adicional puedes contactarte con
aconsuera@geb.com.co o evikoeren@geb.com.co

Universidad de los Andes | Grupo Energía Bogotá | 126 años de historia



Recognition Gala Video: 6th Supplier Recognition Gala





Grupo Energía Bogotá



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