

Guidelines and roadmap for nature management at GEB

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1. Context

Environmental degradation poses significant threats to society and to the stability of local, regional and global economies. The World Economic Forum warns that four of the ten most significant global risks for the next decade are related to environmental degradation, with the loss of biodiversity and ecosystems as the third greatest concern. ([Informe de Riesgos Globales 2024, WEF](#)). This is based on the recognition, by national and international entities, of the intrinsic relationship between the economy and natural capital. In fact, the OECD (2022) estimates that approximately half of global GDP depends on natural resources. Issues such as climate change, the introduction of invasive species, pollution and altered land use are among the main causes of ecological deterioration.

In view of this scenario, various strategies and mechanisms have been implemented at the international level to promote the conservation of nature, including the Convention on Biological Diversity (CBD), established in 1993. The fundamental pillars of this Convention are the conservation of biodiversity, the sustainable use of its components and the fair and equitable sharing of the benefits derived from the use of genetic resources. The Conference of the Parties (COP) is its governing body. It is a multilateral forum that to date has held 16 meetings to establish shared goals, report progress, identify common challenges and co-create solutions. As a result of COP 15, the Kunming-Montreal Global Biodiversity Framework was agreed upon, comprising 23 targets that commit various actors in society, including governments, businesses and educational institutions.

In parallel to the CBD, other disclosure frameworks have been developed to guide companies in the information they must report and the existing methodologies for assessing their interaction with natural capital. This is the case of the Taskforce on Nature-related Financial Disclosures (TNFD) and the GRI 101 published in 2024. In addition, international evaluators such as S&P Global, Moody's Analytics, and CDP, among others, have shown a growing interest in these emerging issues, integrating questions and indicators related to biodiversity.

Today, different stakeholders are demanding from companies and governments an effective management of their interaction with natural resources and the environment. Consequently, peers and international referents have advanced in the construction of commitments, strategies and action plans around biodiversity.

Recognizing the value of nature, Grupo Energía Bogotá and its subsidiaries have developed programs and initiatives in the different territories where they operate. In 2024, the business group built a Strategy that contains guidelines, establishes ambitions and demonstrates its commitment to nature conservation.

2. Articulation with national and international frameworks and standards

The countries in which Grupo Energía Bogotá and its subsidiaries operate have deployed an active regulatory agenda for companies in the sector around environmental issues. These regulations have defined environmental licensing processes, created financial incentives and promoted funding mechanisms for initiatives related to environmental and nature management.

In addition, governments have sought to ensure that their National Strategies and Plans related to biodiversity and ecosystems contribute to global goals. In Peru, as in Colombia, the National Biodiversity Strategy was updated in 2024. In the case of Guatemala, the latest national plan around nature includes the period 2012 - 2022.

Although compliance with environmental regulations is a necessary condition for operating, in some cases GEB subsidiaries have implemented voluntary initiatives that go beyond the requirements of the law and are aligned with provisions and recommendations established under international frameworks, standards and agreements. This is particularly true in the case of GEB projects that are governed by the financing guidelines of multilateral entities and development agencies, such as the World Bank, the Inter-American Development Bank (IDB) or the International Finance Corporation (IFC), which require high levels of environmental performance in the projects they finance.

Currently, biodiversity management in the GEB is largely driven by compliance with its legal obligations under the framework of environmental licenses and permits to operate. However, this Strategy seeks to develop specific guidelines that transcend legal requirements and leave a positive ecological and social legacy in the territories where GEB subsidiaries are present.

3. Alignment with group strategies

The GEB's Sustainability Strategy¹, is consistent with the regulatory and policy advances that have been observed in this area in Peru, Colombia and Guatemala:

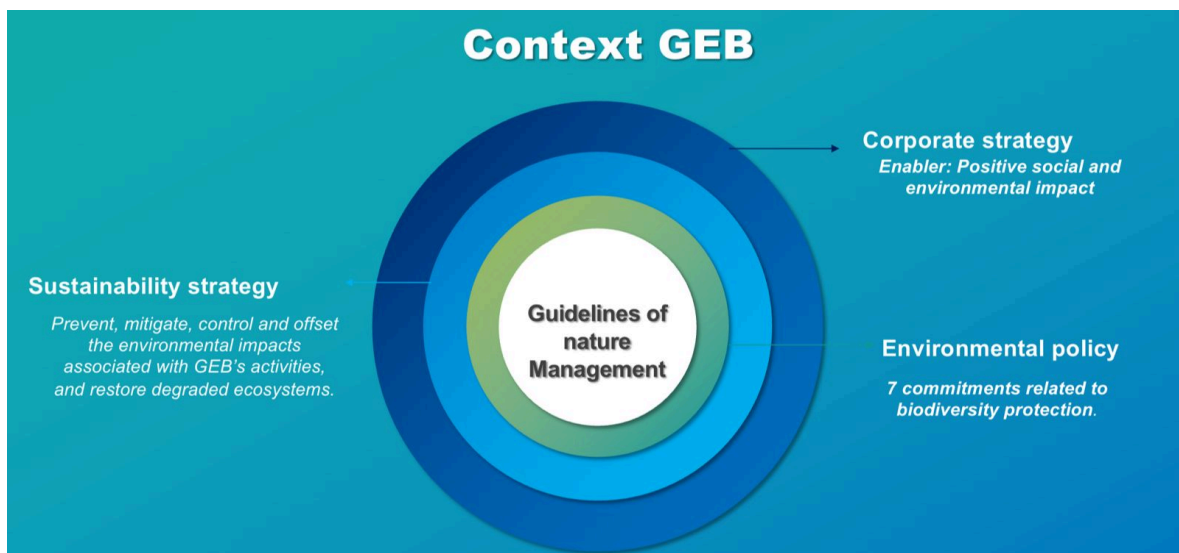
1. "At the local and regional level, prevent, mitigate, control and compensate for environmental impacts associated with GEB activities, restore degraded ecosystems, and contribute to the improvement of urban air quality. At the global level, contribute to the mitigation of climate change." (Sustainability Strategy, GEB)
2. "Prevent, mitigate, control and compensate for social impacts in the areas of influence of GEB's projects and operations, guarantee the protection of human rights, and contribute to prosperity and social well-being at the local level." (Sustainability Strategy, GEB)

¹ Consult Grupo Energía Bogotá's Sustainability Strategy here:
<https://www.grupoenergíabogota.com/en/content/download/33991/file/Sustainability%20Strategy%20GEB%20%28Final%29.pdf>

These two objectives, which have been established and implemented transversally in Grupo Energía Bogotá, are deepened and complemented through these guidelines and action plan.

Grupo Energía Bogotá's Environmental Policy contains commitments related to biodiversity conservation. These include the protection of ecosystems, achieving zero net deforestation in all projects; preventing, mitigating, correcting and compensating environmental impacts associated with operations.

Considering the above, this Strategy will also allow the group and subsidiaries to address climate change issues from a nature-based adaptation perspective while conserving ecosystems in the countries where they operate.



Additionally, it is aligned with GEB's policies and commitments related to Human Rights, as it promotes the recognition of communities and promotes and protects the right to a clean, healthy and sustainable environment.

4. Definitions:

For Grupo Energía Bogotá, the definition of Nature is aligned with the [TNFD \(2024\)](#) y el [IPBES \(2015\)](#), understanding in a general and integral way the diversity in the life forms of organisms, their interactions and the different ecosystems.

Other useful definitions for reading this strategy are:

Natural Capital: is the pool of renewable and non-renewable natural resources, such as plants, animals, air, water, soil and minerals, which combine to generate a flow of benefits for people, according to the [TNFD \(2024\)](#) and [Protocolo de Capital Natural \(2019\)](#).

Ecosistem: a dynamic complex of plant, animal and microorganism communities and the non-living environment, interacting as a functional unit (IPBES (2019)).

Ecosystem services: are the benefits generated by ecosystems for people, economies and businesses. ([TNFD \(2024\)](#), [UN \(2021\)](#)). Los servicios ecosistémicos pueden ser de aprovisionamiento, de regulación, culturales, de apoyo y polinización ([Protocolo de Capital Natural \(2019\)](#)).

Change of land use: is the change or modification of an area from its initial state. For example, the felling of trees to build a project is a process of land use change. ([TNFD, 2024](#)).

Conservation: are the different actions aimed at ensuring the permanence of ecosystems and biodiversity. ([TNFD, 2024](#)).

Restouration: are activities aimed at reestablishing, totally or partially, the functional and structural attributes of ecosystems. It includes recovery, rehabilitation and ecological restoration actions. ([Manual de compensaciones del componente biótico, 2018](#)).

Offsets: is the set of activities or measures, framed in the last stage of the mitigation hierarchy, after avoiding, minimizing or correcting the impact or affectation in an ecosystem, it seeks to “compensate and reimburse the communities, regions, localities and the natural environment for the negative impacts or effects generated by a project, work or activity, which cannot be avoided, corrected or mitigated”. ([Manual de compensaciones del componente biótico, 2018](#)).

Additionality: is an attribute of offset processes that occurs when their results generate additional positive impacts. [Manual de compensaciones del componente biótico \(2018\)](#).

At the point where offsets generate additionality, a net gain in biodiversity is achieved.. ([UICN, 2017](#)). When only impacts are offset and actions do not generate additionality, there is no net loss of biodiversity. ([UICN, 2015](#)).

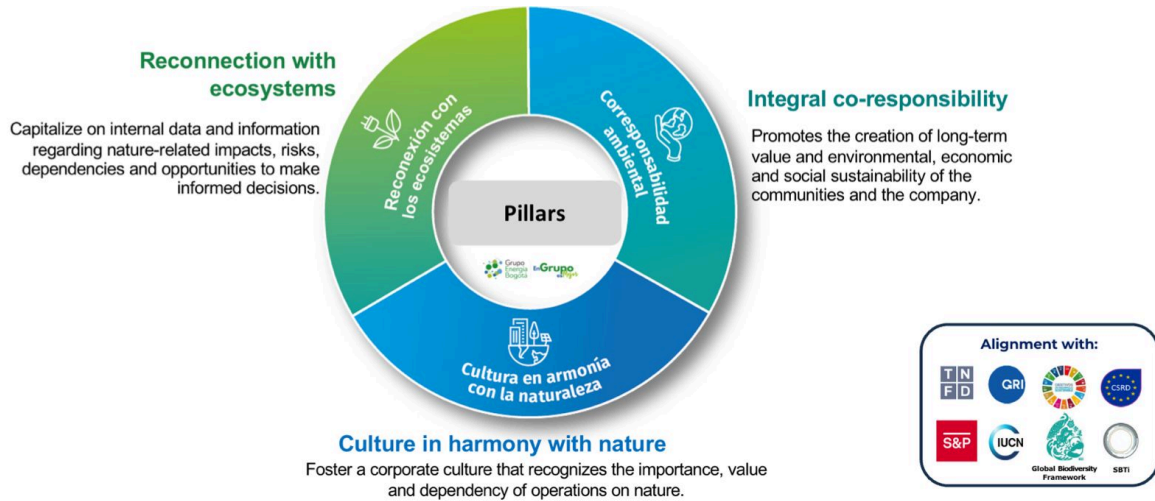
Soluciones Basadas en la Naturaleza: are actions aimed at protecting, managing and restoring ecosystems. They generate ecological benefits, and for the communities. ([UICN, s.f.](#)). These solutions may focus on ecosystem-based protection, restoration, infrastructure or management. In some cases they contribute to climate change adaptation and mitigation. ([Instituto Humboldt, 2021](#)).

Net deforestation equal to zero: it is the balance between the deforested area and the compensation made. ([WRI, 2015](#)).

Value chain: includes all the required activities involved in the production process or operations of each subsidiary, whether upstream or downstream. ([TNFD, 2024](#)).

5. Guidelines for nature management

These guidelines recognize the concerns surrounding the degradation of ecosystems, and are based on the strategies, guidelines and commitments that have been acquired by the corporate group.



5.1 General objective

To develop solutions based on the sustainable use, conservation and restoration of ecosystems, ensuring the involvement of stakeholders and the well-being of local communities.

5.2 Commitments

The following specific goals have been established to demonstrate the GEB's commitment, efforts and ambition in nature-related issues:

Related subject	2030 Medium term	2050 Long term
Biodiversity**	<p>Ensure that 100% of the compensations ordered by the environmental authorities are in the execution stage and generating positive social impacts.</p> <p>Implement at least one flagship project per subsidiary that seeks to conserve a key species or ecosystem.</p>	<p>Implement 100% of the environmental compensations ordered by the environmental authorities, generating positive impacts in the communities in terms of social wellbeing and local development.</p> <p>Ensure no net loss of biodiversity resources and leave a positive net</p>

Related subject	2030 Medium term	2050 Long term
	Monitor the state of ecosystems in 100% of GEB operations.	ecological balance within the areas of influence including reforestation offsets by 2040.
Water	Ensure that 100% of projects and operations with potential impacts on marine, mangrove and freshwater ecosystems adopt all necessary measures to avoid, mitigate and compensate for impacts on nature.	Achieve no net loss of biodiversity in marine, mangrove and freshwater ecosystems.
Emissions	Identify and manage fugitive emissions in 100% of the infrastructure in operation.	All environmental offsets must contribute to the reduction of CO2 emissions and adaptation to climate change.
Circular economy	<p>Develop and implement at least 1 circular economy project in 100% of subsidiaries.</p> <p>To have 1 integrated waste management plan in all subsidiaries.</p> <p>Reduce by 30% the generation of waste in the framework of operations and projects of the subsidiaries compared to the year 2025.</p>	Bring the recycling and reuse rate of solid waste to 100% within the framework of the operations and projects of each subsidiary compared to the year 2025.
Change of land use	<p>Evaluate 100% of new projects with criteria of impacts, risks, dependencies and opportunities in terms of nature in all subsidiaries.</p> <p>Adopt technologies to reduce land use changes in projects under construction.</p> <p>Ensure that in all cases where possible, ecological restoration</p>	<p>Ensure that new projects in prioritized areas evaluate the development and viability of green corridors in newly impacted natural areas.</p> <p>Achieve zero net deforestation in new subsidiary projects.</p>

Related subject	2030 Medium term	2050 Long term
	<p>projects generate additional economic and sustainable benefits for local communities.</p> <p>Avoid deforestation in all projects and operations of GEB and its subsidiaries, and in cases where it is not avoidable, compensate with future reforestation (net deforestation equal to zero).</p>	
Value chain	<p>Transfer knowledge and tools to at least 50% of the actors in the value chain prioritized under nature-related issues in the different phases of the business.</p> <p>Promote in the value chain the prevention of operational impacts in areas of high importance for biodiversity, both nationally and internationally, ensuring that its activities respect the integrity of critical ecosystems and contribute to their conservation.</p>	<p>Transfer knowledge and tools to 100% of the actors in the value chain prioritized under nature-related issues in the different phases of the business.</p> <p>Ensure that at least 80% of the stakeholders in the value chain prioritized under nature-related issues in the different phases of the business have goals in terms of conservation, protection and restoration.</p>

In order to advance in the fulfillment of the goals established under the values of integrity and focus on results, an information system will be developed with updated data and technologies that will allow for informed decision making, tailored to the realities of each project and geography.

* These goals will be achieved by leveraging resources and recognizing the constraints of each subsidiary, along with its institutional and regulatory environment.

** The goals of this roadmap are based on the following baselines² the projects awarded until 2025.

*** For those projects awarded subsequently, the actions and commitments must be developed under the Business As Usual (BAU) scenario.

5.3 Strategic pillars and objectives

² The baseline should be updated according to new projects awarded to the Group's subsidiaries, taking into account changes or growth in each of the businesses.

Pillar 1. culture in harmony with nature

This pillar seeks to generate a corporate culture that recognizes the importance, value and dependence on nature in the operations of GEB and its subsidiaries. The energy connection of the territories must generate positive impacts on biodiversity and communities.

- Specifics objectives

- a. Ensure recognition of the importance and relevance of the analysis of interactions between the Group's operations and nature, and identify positive actions to improve ecosystem conditions.
- b. Train employees, contractors and management on the role of natural capital protection in business growth.
- c. Use the best available technologies, operational and construction processes aimed at minimizing carbon footprint, waste generation and impact on ecosystems.

- Actions

1. Governance standards around nature:
 - i. Ensure that senior management is aware of the importance of nature and integrate a nature-based approach in their decisions.
 - ii. Regularly train members of senior management on issues related to nature conservation.
 - iii. Comply with, maintain and update policies and commitments within the Group and its subsidiaries.
 - iv. Establish roles and responsibilities related to nature within each of the companies.
 - v. Integrate nature criteria into operational decision-making, project development and asset acquisition.
 - vi. Ensure the supervision, monitoring and evaluation of the goals and initiatives developed within the framework of these guidelines.
2. Commitment of workers and contractors to the protection of nature:

Develop training and participation activities for workers and contractors on nature-related issues. Commitment of workers and contractors to the protection of nature:

 - i. Integrate nature protection processes and activities in the development of operations, construction of projects and acquisition of new assets.
 - ii. Ensure high performance of operations and projects to ensure positive contributions to nature.

3. Active articulation among GEB affiliates:

To learn about the experiences, challenges and opportunities of the different subsidiaries in the identification, management, development and evaluation of initiatives related to nature.

- i. Create mechanisms to share experiences, initiatives and lessons learned in relation to the conservation and restoration of nature.
 - ii. Promote incentives and recognition for subsidiaries with good nature management.
 - iii. Document best practices, lessons learned and opportunities to generate synergies among affiliates.
4. Research, innovation and adoption of new technologies and practices that contribute to nature conservation:
- i. Allocate resources to comply with the mandatory and voluntary plans of the nature action plan.
 - ii. Identify and adopt solutions aligned with the bioeconomy that enable the economic use of ecosystem services by communities.
 - iii. Adopt nature-friendly technologies and practices.
 - iv. Optimize the use of resources in the framework of projects under development and construction.

Pillar 2. Reconnection with ecosystems

This pillar recognizes that capitalizing on internal data and information on nature's impacts, risks, dependencies and opportunities is fundamental to making informed decisions in favor of nature conservation, community well-being and the Group's finances.

- Specifics objectives:

- a. Use environmental impact assessments and interactions with nature, with a special focus on biodiversity conservation, maintenance of ecosystem services and social well-being.
- b. Identify and manage impacts on the rights of communities and other stakeholders related to the environment, which may be generated by the interactions that the Business Group has with nature
- c. Monitor the health and resilience of ecosystems while adopting appropriate operational practices to minimize negative impacts.
- d. Develop action plans for biodiversity conservation in the territories prioritized by each subsidiary.
- e. Accompany the value chain in assessing its risks and impacts related to nature and in its conservation and restoration initiatives.

- Projects

1. knowledge capitalization:

Re-evaluate the knowledge acquired from environmental management plans.

- i. Analyze the information available for each territory or project.
- ii. Complement the analysis with the evaluation of dependencies, impacts, risks and opportunities related to nature.
- iii. Quantify the financial impact of the materialization of the identified risks.
- iv. Determine science-based objectives to avoid, minimize, restore and compensate for the impacts on nature.
- v. Establish minimum performance criteria, adapted to the reality of each subsidiary, for the construction of new projects or the operation of existing projects.
- vi. Document success stories, guides and other knowledge management tools based on the experiences acquired.

2. Biodiversity inventory

To have modular, multi-scale and multi-purpose tools and information systems containing updated data, metadata and analysis to make decisions according to the reality of each branch and territory.

- i. Complement local information with regional, national and global information.
- ii. Participate in spaces for the dissemination of biodiversity information in the group's areas of influence.
- iii. Develop integrated information systems that systematize information derived from impact measurements, fauna and flora monitoring, and identified risks, among others.
- iv. Identify interactions between communities, biodiversity management in the territories, impacts, and opportunities to protect nature and generate social wellbeing.
- v. Focus greater conservation and restoration efforts on the most sensitive areas and most affected ecosystems.
- vi. Build biodiversity action plans in areas prioritized for their ecological importance, sensitivity or risk.

3. Value chain support

Extend the positive impact to value chains through the transfer of knowledge, tools and capabilities.

- i. Form the value chain in the protection of nature.
- ii. Assess dependencies, impacts, risks and opportunities related to nature.
- iii. Incorporate criteria for evaluating and selecting suppliers with a focus on nature.
- iv. Include the information collected by the value chain in the biodiversity inventory.

- v. Encourage the adoption of specific goals of the actors in the value chain of each of the subsidiaries.

Pillar 3. Integral co-responsibility

This pillar promotes the creation of long-term value and the environmental, economic and social sustainability of the communities and the company.

- Specifics objectives

- a. Develop Nature-Based Solutions that generate a net positive impact on ecosystems and biodiversity.
- b. Integrate communities in the management of biodiversity and the conservation of ecosystem services in their territories
- c. Implement a transparent monitoring and reporting system to evaluate the effectiveness of offset measures, and ensure continuous improvement of the initiatives implemented.

- Projects

1. Stakeholder awareness:

Ensure recognition of the importance of nature in the economy and in GEB's operations by its stakeholders: customers, authorities, local communities, shareholders, among others.

- i. Identify the stakeholders most impacted by or interested in nature.
- ii. Train and engage stakeholders in the processes of identifying material risks, dependencies, opportunities, and impacts related to nature.
- iii. Manage knowledge through skills transfer and capacity building within stakeholder groups.

2. Joint and comprehensive solutions.

Co-create nature-positive solutions in the territories where the business group is present, leveraging financial incentives and recognizing and replicating lessons learned from market peers.

- i. Structure and develop Nature-based Solutions with the participation of communities, local authorities, and technical experts.
- ii. Leverage existing financing mechanisms (such as tax-for-works programs, payments for environmental services, international cooperation funds, etc.).
- iii. Participate in alliances and initiatives aligned with the goals of this Strategy.

3. Promotion of local development:

Ensure that the solutions are developed and agreed upon with the relevant territorial and national stakeholders, and that they generate local development and opportunities.

- i. Incorporate traditional and ancestral knowledge of local communities in the design of nature conservation strategies and activities.

- ii. Facilitate community participation and ownership in nature conservation initiatives.
- iii. Measure environmental improvement and the social well-being of communities.

5.4 Mobilizers

Mobilizers are resources, tools, or processes that facilitate or enhance the implementation of the guidelines and roadmap.

- a. Sustainability Strategy³:
Outlines the approach to ensure the execution of this guide's specific objectives related to ecosystem restoration and social well-being.
- b. Environmental Policy⁴:
Enables the leveraging of initiatives implemented under the commitments of the environmental policy, particularly those related to biodiversity.
- c. Culture::
Aims to foster a culture of respect for life.
- d. Information systems.
Enable the systematization of data related to impact measurement, monitoring of fauna and flora, community agreements, legal obligations, identified risks, among other useful information for decision-making.
- e. International Standards:
Serve as references and provide guidelines to ensure transparency of reported information and address stakeholder needs and expectations.
- f. Capitalization of Relationship-Building Experiences:
Allows for the replication and expansion of successful outcomes based on transparent, genuine, and respectful engagement.
- g. Collaboration Networks:
Facilitate the exchange of experiences and collaboration among technical experts, market peers, and communities to support the scaling of positive impacts.

5.5 Action criteria

They are the principles that must be upheld within the framework of the guidelines.

- a. Garantizar el cumplimiento regulatorio y normativo vigente en cada país, priorizando acciones de prevención, mitigación, corrección y/o compensación de los impactos ambientales en la biodiversidad, de acuerdo con los Estudios de Impacto Ambiental, Planes de Manejo y Licencias Ambientales vigentes para la operación de nuestros activos.
- b. Incorporar la jerarquía de mitigación en los proyectos del GEB y sus filiales.

³ Consult the Sustainability Strategy of Grupo Energía Bogotá here:
<https://www.grupoenergiabogota.com/en/content/download/33991/file/Sustainability%20Strategy%20GEB%20%28Final%29.pdf>

⁴ Consult the Environmental Policy of Grupo Energía Bogotá here:
<https://www.grupoenergiabogota.com/en/content/download/39928/file/DP-011-2023%20Environmental%20Policy.pdf>

- c. Do not operate in protected areas classified under IUCN categories I to IV.
- d. Develop initiatives tailored to the specific realities of each geographic area and local community.
- e. Ensure triple-impact solutions (economic, social, and environmental).
- f. Facilitate resilience in the face of operational processes and internal decisions within the Group and its subsidiaries to support nature conservation.
- g. Monitor and evaluate the impact of compensation measures.
- h. Communicate progress, challenges, risks, and identified impacts in the Group's operations and projects, as well as those of its subsidiaries.

5.6 Compliance with global goals and objectives

Building on the global and local efforts being implemented around nature, the global goals and objectives provide clear horizons that should guide the actions of public institutions, private entities, and civil society. Through the implementation of this action plan, Grupo Energía Bogotá and its subsidiaries are actively contributing to 7 targets of the Kunming-Montreal Global Biodiversity Framework.⁵ These targets include:

- a. Restoring 30% of degraded terrestrial, inland water, coastal, and marine ecosystems by 2030 (Target 2).
- b. Promoting the effective management of at least 30% of terrestrial, coastal, or marine areas of high biodiversity importance through protected areas (Target 3).
- c. Restoring, conserving, and enhancing ecosystem services valued by people through nature-based solutions and ecosystem-based strategies (Target 11).
- d. Integrating biodiversity into strategic processes and decision-making at all organizational levels (Target 14).
- e. Taking the necessary measures to assess nature-related risks, impacts, and dependencies, transparently disclose this information, and reduce negative impacts on nature (Target 15).
- f. Promoting the development of capabilities and innovative technologies to support the conservation and sustainable use of biodiversity (Target 20).
- g. Involving communities in nature-related decision-making processes (Target 22).

⁵To consult the Kunming-Montreal Global Biodiversity Framework, visit the following link: <https://www.cbd.int/doc/decisions/cop-15/cop-15-dec-04-en.pdf>