



# Human Rights Due Diligence System:

Impact prevention, assessment and mitigation in GEB



Grupo  
Energía  
Bogotá

*Mejoramos vidas  
con energía  
sostenible y  
competitiva*

# Human Rights Strategy Business Group

**Human Rights  
Due Diligence  
System**

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**Diversity, Equity,  
and Inclusion (DEI)  
Work Plan**

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**Key work  
areas**

**Training and  
Awareness**

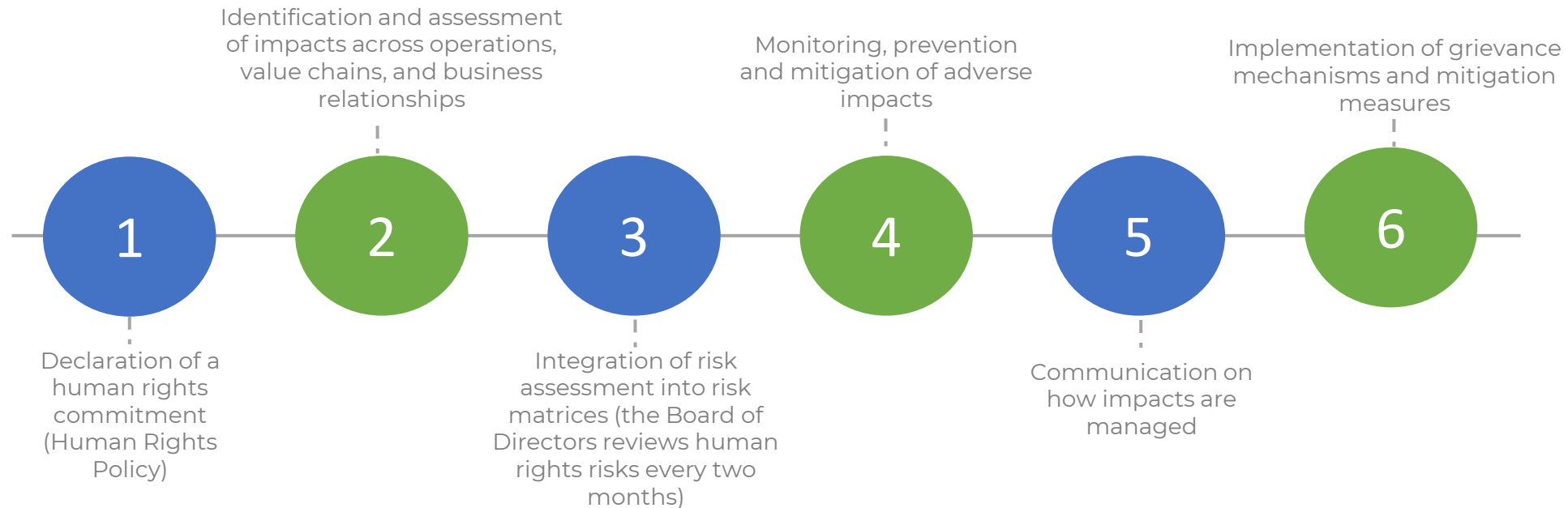
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**Huma Rights Risk  
Management**

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# Stages of the Due Diligence Process

The due diligence process covers the following stakeholders: **employees, women, children, indigenous peoples, contractors (including third-party employees), and local communities.**



## Scope of GEB's Human Rights Due Diligence

- **Colombia:** GEB (Holding), Enlaza, and Transportadora de Gas Internacional (TGI)
- **Peru:** Cálidda, Contugas, and Electrodonas
- **Guatemala:** Conecta

# Human Rights Due Diligence in GEB and its subsidiaries

## Corporate Framework:

GEB has a Human Rights Due Diligence System aligned with international standards, which includes a robust human rights policy, risk identification, prevention and mitigation measures, and grievance mechanisms.

## Implementation in Subsidiaries:

The following subsidiaries have adopted the corporate Human Rights Policy and have their own due diligence systems in place, along with action plans to prevent and mitigate impacts:

1. Transportadora de Gas Internacional (TGI) (Colombia)
2. Enlaza (Colombia)
3. Conecta (Guatemala)
4. Cálidda (Perú)
5. Contugas (Perú)
6. Electroquinas (Perú)

## Key aspects:

- The Human Rights Policy has been formally adopted by all subsidiaries.
- Each subsidiary has identified and assessed human rights risks and incorporated them into their strategic risk matrices.
- The Sustainability and Communications department of GEB (holding company) provides technical assistance to subsidiaries to ensure coherence, supervision and continuous improvement.

## Periodic review of risks:

- GEB conducts periodic monitoring of risks related to human rights, including trends and best practices.
- Risk matrices are updated at least once a year, based on new controls, guidelines, communication and reporting channels, and remediation measures.
- Additionally, strategic human rights risks are overseen bi-monthly by the Board of Directors through the Risk and Audit Committee.
- This periodic review covers own operations, value chains, and commercial relationships.

# Strengthening our Human Rights System: New Business Relationships and Partner Evaluation

## 1. Risk identification in new business relationships

- GEB incorporates human rights risk analysis into mergers, acquisitions, and the creation of joint ventures.
- Public background checks, risk levels, and human rights policies are reviewed before formalizing new partnerships.

## 2. Human rights impacts self-assessment – strategic partners (2024)

In 2024, a human rights impacts self-assessment was conducted with seven investee companies: Argo, Vanti, Redeia, Enel, ISA REP, EMSA, and Promigas.

### Methodology:

- Self-assessment questionnaire focused on probability and severity of impacts.
- Cross-verification using public sources such as sustainability reports and official websites.

## Business partners and investee companies



# Potential Human Rights Impact Areas

## Scope: Business Group

The identification of impact areas considered: region (Latin America), countries where subsidiaries operate (Colombia, Peru, and Guatemala), and sector (energy and gas).

01

Labor practices

02

Relationship with local communities

03

Environmental impact

04

Public safety

05

Privacy and digital technologies

06

Ethics and transparency

07

Diversity, equity, and inclusion

08

Quality of supply



# Potential Human Rights Impact Areas

## Details

01

### Labor Practices

#### Typologies:

- a) **Union freedom (freedom of association and the right to collective bargaining)**
- b) Working conditions
- c) Occupational health and safety
- d) Equality and diversity (equal pay)
- e) Child labor and forced labor

#### Main Human Rights Affected:

Labor and union rights (freedom of association and collective bargaining), the right to work under fair and favorable conditions, the right to social protection, the right to an adequate standard of living and to enjoy the highest attainable standard of physical and mental health, equality (equal pay) and non-discrimination, children's rights, liberty and security.

02

### Relationship with local communities

#### Typologies:

- a) Land rights and access to natural resources
- b) Other social or cultural impacts
- c) Other impacts on health and safety

#### Main Human Rights Affected:

The rights to food, housing, and health, the rights of indigenous peoples.

03

### Environmental Impact

#### Typologies:

- a) Climate change
- b) Other large-scale environmental impacts

#### Main Human Rights Affected:

The rights to life, food, housing, and health, the right to a healthy environment and sustainable development, the rights of indigenous peoples.

# Potential Human Rights Impact Areas – Details

04

## Public Security

### Typologies:

- a. Violence and intimidation of members of local communities, social leaders, human rights or environmental defenders, union leaders, etc.

### Main Human Rights Affected:

Right to life, liberty, and security, right not to be subjected to torture or cruel, inhuman, or degrading treatment.

05

## Privacy and Digital Technologies

### Typologies:

- a) Issues arising from the surveillance of communications and the collection, storage, and management of personal data from clients, employees, and third parties.

### Main Human Rights Affected:

Right to privacy and data protection.

06

## Ethics and Transparency

### Typologies:

- a) Corruption and bribery
- b) Corporate tax policy
- c) Competition

### Main Human Rights Affected:

Equality and non-discrimination  
Access to basic and quality services  
Rights of the most vulnerable groups.



# Potential Human Rights Impact Areas – Details

07

## Diversity, Equity, and Inclusion

### Typologies:

- a) Stereotypes
- b) Invisible barriers
- c) Discrimination
- d) Violence and harassment in the workplace
- e) Sexual harassment

### Main Human Rights Affected:

Equality and non-discrimination, Labor rights, access to basic and quality services, rights of the most vulnerable groups

08

## Supply Quality

### Typologies:

- a) Quality and reliability of supply
- b) Access to and affordability of energy

### Main Human Rights Affected:

Right to physical and mental health and well-being, right to an adequate standard of living and means of subsistence, right of peoples to freely dispose of their wealth and natural resources

# Key achievements of GEB's Human Rights Strategy 2024

## Human Rights Progress

### Key Achievements

- Inclusion of the human rights risk as a strategic risk in GEB and all subsidiaries.
- Update of petitions, complaints and claims mechanisms (Ethics Channel and Document Management)l.
- Inclusion of a dedicated category in the Ethics Channel for human rights-related complaints.
- Assessment of human rights impacts in business partners and investee companies, with tailored recommendations.
- Training of GEB and Enlaza officers in charge of petitions, complaints and claims, on human rights grievance mechanisms.
- Review of historical petitions and claims records (2021–2023) to identify possible negative human rights impacts

## Training and Culture

### Employees – Key achievements

- Human Rights e-learning course conducted in GEB, Cálidda, Contugas, TGI, Conecta, and Enlaza.
- 97 social, environmental, and land management staff from Enlaza trained in human rights.
- 72% of GEB and Enlaza employees participated in the Human Rights and DEI perception survey, leading to a focused action plan to close identified gaps.

### Contratistas – Principales logros

- 248 individuals from 35 key contractors of GEB and Enlaza trained in human rights (including management and operations teams)

# Diversity, Equity and Inclusion (DEI)

## Action plan components

### Objective

To foster an organizational culture where all individuals are valued and respected, promoting equal opportunity and development in a diverse, safe, and inclusive environment across operations, supply chain, and communities of influence.

### Action areas:

#### Talent

- Promote equity in all recruitment, promotion, and compensation procedures.
- Implement awareness and training programs in DEI.
- Promote women's leadership in strategic roles.
- Ensure accessibility for employees with disabilities.
- Attract and retain diverse talent.

#### Suppliers

- Integrate DEI criteria into supplier and contractor selection and management.
- Train and advise suppliers and contractors on implementing DEI best practices.

#### Communities

- Incorporate a DEI approach in all social impact projects.
- Create educational, employment, and development opportunities for vulnerable populations.
- Train company field managers in human rights and DEI

Internal and external communication (social media, website, integrated report) with data and testimonials on the impact of our DEI actions.

### Monitoring and Evaluation

- Regular working groups between Talent, Sustainability, and Procurement areas.
- Quarterly DEI Committee reviews to measure progress and adjust initiatives.
- Promote participation of employees, suppliers, and communities in the strengthening of action plans to ensure continuous improvement

# Diversity, Equity and Inclusion

## 2024 Progress

All GEB subsidiaries have a Diversity, Equity, and Inclusion Committee and action plans to close DEI gaps.

### Talent

#### Focus

Achieve a diverse workforce, equity in job positions, and an inclusive culture

#### Key achievements

- Bias-free selection procedures
- Anonymous CV process
- Diagnosis and action plan for the labor inclusion of persons with disabilities in GEB, TGI, Contugas, ElectroDunas, and Conecta
- "Diversity Classroom" with DEI training for employees
- 7.48% of the workforce identifies as diverse\*
- 39% of middle management positions are held by women
- ElectroDunas recognized in 2024 for best DEI practices among inclusive companies

### Suppliers

#### Focus

Promote human rights and DEI best practices in the supply chain

#### Key achievements

- Implementation of the "Female Line Workers" program (Enlaza)
- DEI criteria adopted in procurement processes at GEB, Enlaza, and TGI
- 45 contractors from GEB and its subsidiaries participated in the Strategic Sustainability Course which included modules on DEI.

### Communities

#### Focus

Incorporate a DEI approach in social impact projects

#### Key achievements

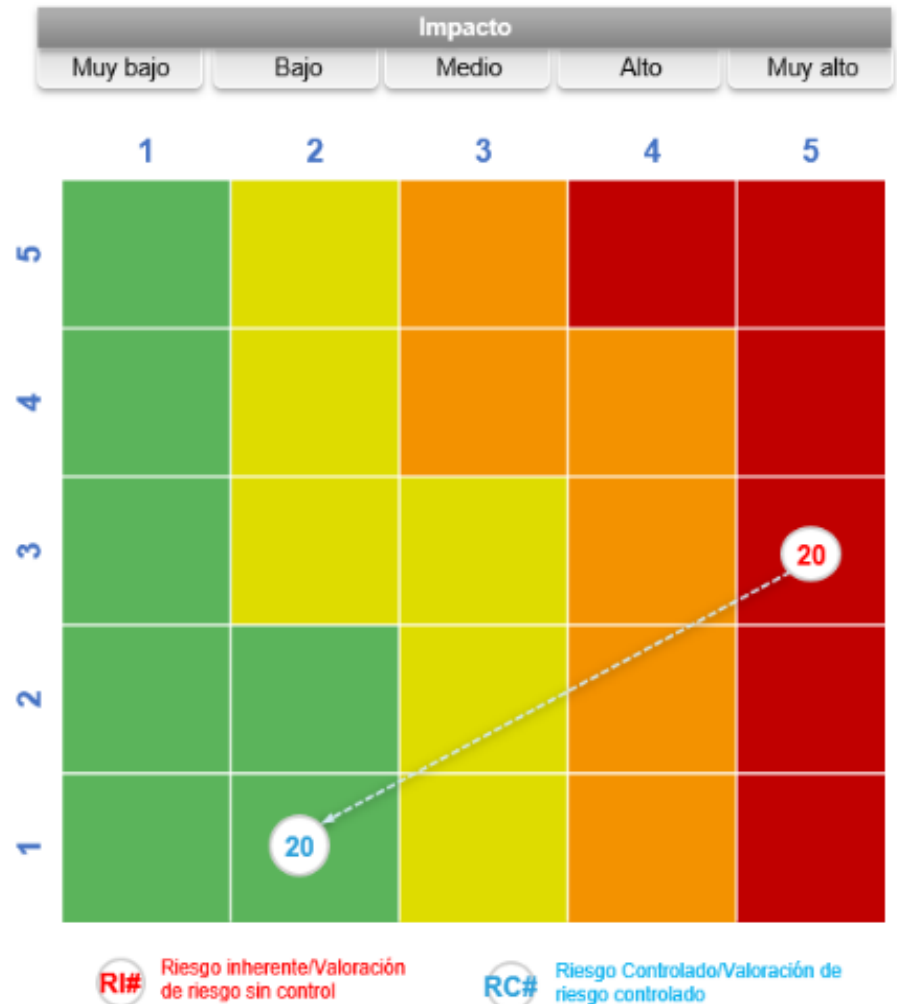
- +3,000+ women and diverse population benefited from the Legacy for the Territory ("Legado para el Territorio" program)
- 94% of Enlaza's social, environmental, and land management professionals trained in conflict resolution, negotiation, and stakeholder engagement
- 7,000+ women benefited from Cálidda's Community Kitchens program on topics such as nutrition, hygiene, water care, and entrepreneurship.

\*LGBTIQ+, ethnic/racial minorities, others – Mercer Survey 2024 results

# Proactive Human Rights Risk Management

- GEB has implemented a robust and proactive process to manage human rights risks in its operations. In October 2022, the inclusion of HR violation risks was approved in the Group's strategic risk matrix. Since then, the Board of Directors conducts **bimonthly** monitoring to ensure that prevention and mitigation actions are effective and conducted in a timely manner.
- Additionally, as per 2024, the HR risk had been incorporated as a strategic risk in all subsidiaries: Enlaza, TGI, Contugas, ElectroDunas, Cálidda, and Conecta.
- The risk identification and assessment process covers not only the company's own operations but also business relationships and value chain. Prevention and mitigation actions include ongoing training for employees and contractors, as well as the development of internal protocols tailored to prevent or mitigate identified risks.
- The risk matrix helps prioritize and allocate resources effectively, ensuring that areas with the highest HR risks receive the most attention..

Rsk: Violation of HR by GEB, employees, business partners, or contractors



# Human Rights mitigation plans

In the past three years, GEB has successfully implemented human rights mitigation plans without identifying any significant violations within its operations, reinforcing the effectiveness of its preventive management approach.

The following mitigation processes have been implemented by the Group and highlight key areas of action:

- **Communities:** GEB's Intercultural Engagement Guidelines require that the human rights due diligence process includes the assessment of actual and potential impacts and the definition of management measures. These include identifying how potential negative consequences will be addressed during different stages of the project.
- **Suppliers and Contractors:** Periodic evaluations are conducted in areas such as HSE, environmental management, and social responsibility. Where risks are identified, contractors are required to submit improvement plans. More information is available in the HSSE Manual: [https://www.grupoenergiabogota.com/en/content/download/33835/file/Manual%20HSSE\\_En.pdf](https://www.grupoenergiabogota.com/en/content/download/33835/file/Manual%20HSSE_En.pdf)
- **Employees:** All subsidiaries have a Diversity, Equity, and Inclusion (DEI) Committee responsible for ensuring compliance with the Human Rights Policy and the HR and DEI strategy. The committee approves and monitors prevention and mitigation plans, including training and awareness programs for employees and tools to ensure fairness and non-discrimination in recruitment. Additionally, GEB operates a Labor Coexistence Committee to manage workplace harassment complaints, in line with the established procedure.



# Grupo Energía Bogotá



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