

Human Rights Risks and Controls Business Group

Human Rights Due Diligence Implementation

Grupo Energía Bogotá (GEB) has implemented a human rights due diligence process across all business operations, covering operational sites in Colombia, Peru, and Guatemala. GEB's approach is proactive, continuously evaluating potential human rights risks at all operational levels. **In the past three years, no human rights violations have been identified.**

Operational Coverage by Country

- **Colombia:** Includes electrical transmission projects in the country's three regions (central, northern, and southwestern), natural gas transportation centers (8 operational infrastructures), and gas compressor stations (16 operational infrastructures).
- **Peru:** Operations in Lima, Callao, and four additional provinces (Chincha, Pisco, Ica, and Nasca).
- **Guatemala:** Operations refer to Conecta's electrical transmission projects.

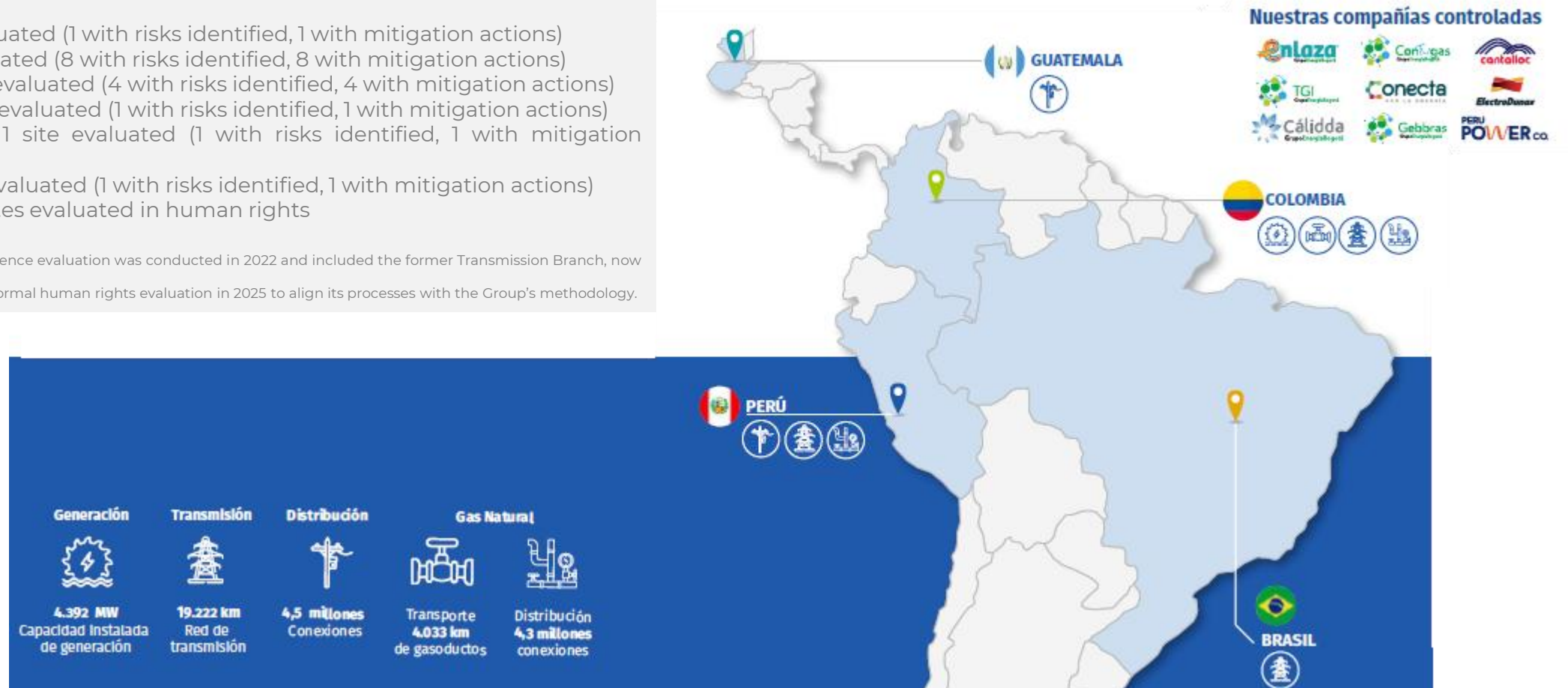
Operational sites evaluated in HR (last 3 years) Grupo Energía Bogotá

Human rights assessments by subsidiary:

- **GEB***: 1 site evaluated (1 with risks identified, 1 with mitigation actions)
- **TGI**: 8 sites evaluated (8 with risks identified, 8 with mitigation actions)
- **Cálidda**: 4 sites evaluated (4 with risks identified, 4 with mitigation actions)
- **Contugas**: 1 site evaluated (1 with risks identified, 1 with mitigation actions)
- **Electro Dunas**: 1 site evaluated (1 with risks identified, 1 with mitigation actions)
- **Conecta**: 1 site evaluated (1 with risks identified, 1 with mitigation actions)
- **Cantalloc****: 0 sites evaluated in human rights

*GEB's human rights due diligence evaluation was conducted in 2022 and included the former Transmission Branch, now Enlaza.

**Cantalloc will begin its first formal human rights evaluation in 2025 to align its processes with the Group's methodology.



HR Risk Matrices in GEB and Subsidiaries

Main controls and mitigation
actions taken regarding HR



Risk: Violation of Human Rights (HR) by GEB, employees, partners, or contractors

Possible causes	Possible consequences	Controls/Response Plans
1. Lack of public commitment declaring respect for HR	<ul style="list-style-type: none"> •Reputational damage, economic sanctions •Disciplinary sanctions, criminal penalties •Financial loss due to remediation of impacts •Operational disruption 	C1. Implement, disseminate, and monitor compliance with the Policy. C1. Implement a human rights due diligence system. C1. Communication protocols on HR matters.
2. Contractors not applying labor practices for HR protection		C2. Clauses for contract termination in case of HR violations. C2. HR criteria in contractor evaluation. C2. HR component in the “contract complexity matrix”. C2. HR criteria in subcontracting.
3. Conflicts generated by incorrect engagement with stakeholders		C3. Guidelines for community engagement. C3. Crisis communication protocols with communities.
4. Involvement of GEB, its employees, or contractors in public order situations		C4. Community engagement manuals. C4. HR training for contractors.

Risk: Violation of Human Rights (HR) by GEB, employees, partners, or contractors

Possible causes	Possible consequences	Controls/Response Plans
5. Actions by GEB that affect HR	<ul style="list-style-type: none"> •Reputational damage, economic sanctions •Disciplinary sanctions, criminal penalties •Financial loss due to remediation of impacts •Operational disruption •Impact on GEB's classification in international standards (DJSI) 	C.5 Human Rights training plans for employees. C.5 Human Rights training plans for critical contractors. C.5 Training plans in diversity, equity, and inclusion for leaders and employees. C.5 Tools and processes to prevent discriminatory actions in selection processes. C.5 Workplace Coexistence Committee. C.5 Training for the Coexistence Committee in Human Rights and handling of complaints.
6. Lack of information regarding Human Rights complaints and claims (PQRs, etc.)		C.6 Human Rights complaint channels. C.6 Monitoring and follow-up of the performance of PQRs and complaints.
7. Lack of Preventive and Corrective Management in Human Rights Matters		C7. Adoption of the policy, instruments, and indicators in the subsidiaries. C7. Monitoring of Human Rights management in the subsidiaries. C7. Insurance policies: General Civil Liability (RCE), Civil Liability, personal accident, compliance, etc.

Risk: Human Rights (HR) violations by employees, partners, or contractors of ENLAZA GEB

Possible causes	Possible consequences	Controls/Response Plans
1. Lack of a public commitment declaring respect for Human Rights (HR)	<ul style="list-style-type: none"> • Reputational damage, economic sanctions • Disciplinary or legal sanctions • Financial loss due to impact remediation • Operational disruption 	C1. Implement, disseminate, and monitor compliance with the Human Rights Policy. C1. Implement a Human Rights due diligence system. C1. Communication protocols on HR matters.
2. Contractors lacking labor practices to ensure HR protection		C2. Contract termination clauses for HR violations.C2. HR criteria in contractor evaluation.C2. HR component in the “contract complexity matrix.”C2. HR criteria in subcontracting.
3. Conflicts arising from inappropriate engagement with stakeholders		C3. Guidelines for community engagement. CC3. Crisis communication protocols with communities.
4. Involvement of Enlaza, its employees, or contractors in public order situations		C4. Community engagement manuals. C4. Human Rights training for contractors.

Risk: Human Rights (HR) violations by employees, partners, or contractors of ENLAZA GEB

Possible causes	Possible consequences	Controls/Response Plans
5. Actions by Enlaza that may affect Human Rights	<ul style="list-style-type: none"> • Reputational damage, economic sanctions • Disciplinary or legal sanctions • Financial loss due to impact remediation • Operational disruption • Impact on GEB's classification in international standards (DJSI) 	C.5 HR training programs for employees. C.5 HR training programs for critical contractors. C.5 Training programs on diversity, equity, and inclusion for leaders and employees. C.5 Tools and procedures to prevent discriminatory practices in recruitment processes. C.5 Labor Coexistence Committee. C.5 Training the Coexistence Committee in HR and grievance handling.
6. Lack of information regarding HR-related complaints and grievances (PQRs, etc.)		C.6 Grievance mechanisms for HR matters. C.6 Monitoring and follow-up on PQR and grievance management.
7. Lack of preventive and corrective HR management		C.7 Policy adoption, tools, and indicators across subsidiaries. C.7 HR management monitoring in subsidiaries. C.7 Insurance policies: General Civil Liability, Civil Liability, Personal Accident, Compliance, etc.

Risk: Human Rights (HR) violations by TGI, employees, or contractors

Possible causes	Possible consequences	Controls/Response Plans
1. Lack of a public commitment declaring respect for Human Rights (HR)	<ul style="list-style-type: none"> • Reputational damage, economic sanctions • Disciplinary sanctions, criminal penalties • Financial loss due to remediation of impacts <ul style="list-style-type: none"> • Operational disruption • Negative impact on GEB's classification in international standards (DJSI) 	C1. Implement, disseminate, and monitor compliance with the Human Rights Policy. C1. Implement a Human Rights due diligence system.
2. Contractors lacking labor practices to ensure HR protection		C2. Include contract termination clauses for HR violations. C2. Evaluate contractors using HR criteria. C2. Apply HR criteria in subcontracting (clauses in contract templates). C2. Include HR risks in the service procurement risk matrix.
3. Conflicts due to inappropriate engagement with stakeholders		C3. Update and apply the protocol for community and local stakeholder engagement.

Risk: Human Rights (HR) violations by TGI, employees, or contractors

Possible causes	Possible consequences	Controls/Response Plans
4. Involvement of TGI, its employees, or contractors in public order situations	<ul style="list-style-type: none"> • Reputational damage, economic sanctions • Disciplinary sanctions, criminal penalties • Financial loss due to remediation of impacts • Operational disruption • Negative impact on GEB's classification in international standards (DJSI) 	C.4 HR training for contractors and employees. C.4 HR and conflict management training for communities.
5. Actions by TGI that may affect Human Rights		C.5 HR training programs for employees. C.5 HR training for critical contractors. C.5 Training on diversity, equity, and inclusion for leaders and staff. C.5 Tools and processes to prevent discrimination in recruitment. C.5 Monitoring of HR complaints by the Labor Coexistence Committee. C.5 Training the Committee on HR and grievance handling.
6. Lack of information regarding HR complaints and grievances (e.g., petitions)		C.6 Updating and communicating grievance mechanisms focused on HR. C.6 Monitoring and tracking the performance of HR-related grievance channels.
7. Weaknesses in preventive and corrective HR management		C.7 Monitoring and implementation of HR indicators. C.7 Activation of insurance policies: General Civil Liability, Civil Liability, Personal Accidents, Compliance, etc.

Risk: Human Rights (HR) management by the company in labor practices and local communities

Possible causes	Possible consequences	Controls/Response Plans
<p>1. Lack of identification of gaps between internal policies and national/international HR standards.</p> <p>2. Lack of effectiveness analysis of policy and procedure implementation for managing HR in business operations, including contractors and subcontractors.</p>	<ul style="list-style-type: none"> • Business continuity issues, license/permit cancellations • Legal liabilities, administrative/criminal sanctions. Barriers to external financing • HR recruitment/retention challenges • Damage to reputation/image • Increased local conflict • Compensation for HR violations and financial loss due to remedies 	<p>1,2. Implement HR due diligence to identify, prevent, mitigate, and communicate risks. Conduct internal reviews of effectiveness and need for policy/procedure adjustments.</p>
		<p>1,2,3. Establish accessible and confidential grievance mechanisms for employees and communities.</p> <p>2,3. Assess contractor HR risks, apply binding contract clauses, conduct periodic audits.</p>
<p>3. Involvement of the company, employees, or contractors in rights violations.</p>		<p>1,2,3. Launch HR training programs for employees, contractors, and communities.</p> <p>1,2,3. Implement community engagement processes with a HR perspective.</p> <p>1,2. Develop a DEI (diversity, equity, inclusion) approach aligned with the company's HR policy.</p>

Possible causes	Possible consequences	Controls/Response Plans
1. Weak system for identifying government regulatory proposals.	<ul style="list-style-type: none"> • Negative economic impact. • Reputational damage to Cálidda. • Risk of concession extension being denied due to repeated non-compliance. • Serious HR violations. • Irreparable harm to affected rights holders. • Loss of stakeholder trust. 	<p>C03: Review ongoing legal cases and “new” legal processes (from the past 6 months); define legal strategies and determine actions to mitigate future contingencies and regulatory non-compliance risks.</p> <p>C06: Review/update the Regulatory Compliance Matrix: Identify new or amended regulations/tariffs and assess impacts on the company.</p> <p>C39: Monitor legal defense strategies.</p> <p>C45: Periodic review and update:– Annual review of Cálidda’s Human Rights Policy– Biannual update of the Human Rights risk matrix</p> <p>C46: Ongoing monitoring:– Monitor and ensure compliance with HR contractual clauses– Track and report potential HR impacts</p> <p>C47: Human Rights training plan:– Implement annual training plans for employees and contractors– Report semiannual evidence of trainings (attendance sheets, presentations, etc.)</p>
2. Ambiguous interpretation of the law.		
3. Lack of documentation to support traceability of issued regulations.		
4. Commercial agreements signed without supporting documentation (contracts).		
5. DS 001-2022-TR Amendments to the outsourcing regulation law: Potential authority interpretations differing from the company’s position, possibly resulting in fines or reputational damage.		
6. Absence of a corporate Human Rights (HR) policy and due diligence systems		
7. Lack of contractual instruments to prevent HR violations by contractors.		
8. Lack of HR training for staff and contractors.		
9. Accelerated growth of the Non-Banking Financing (FnB) business model.		



Risk: Human Rights violations by Electro Dunas, a collaborator, partner, or contractor

Possible causes	Possible consequences	Controls/Response Plans
1. Absence of a public commitment to Human Rights (HR)	<ul style="list-style-type: none"> • Reputational damage to the Company • Economic, disciplinary, and/or criminal sanctions • Financial loss due to remediation of impacts • Operational disruption • Impact on GEB's ranking in international standards (DJSI) 	<p>C1. Implement, disseminate, and monitor compliance with the Sustainability Policy.</p> <p>C2. Include contract termination clauses for HR violations under Legal/Procurement/Sustainability.</p> <p>C3. Implement a community engagement manual.</p> <p>C4. Provide HR training for employees and critical contractors.</p> <p>C5. Monitor and track the performance of PQRs and HR-related complaints through the active grievance channel.</p> <p>C6. Monitor recruitment processes to ensure non-discrimination based on race, gender, or other conditions.</p> <p>C6. Maintain a Civil Liability Insurance Policy (coverage for third-party damages).</p>
2. Contractors and/or suppliers lacking good labor practices for HR protection or engaging in HR violations.		
3. Conflicts arising from improper engagement with stakeholders.		
4. Actions by Electro Dunas that affect Human Rights.		
5. Lack of information regarding HR-related complaints and grievances (PQRs, etc.).		
6. Lack of preventive and corrective management regarding HR issues.		

Risk: Human Rights violations

Possible causes	Possible consequences	Controls/Response Plans
1. Absence of a public commitment to Human Rights (HR)	<ul style="list-style-type: none"> • Reputational damage to the Company • Economic, disciplinary, and/or criminal sanctions • Financial loss due to remediation of impacts • Operational disruption • Impact on GEB's ranking in international standards (DJSI) 	<p>C1. Implement, disseminate, and monitor compliance with the Sustainability Policy.</p> <p>C2. Include contract termination clauses for HR violations under Legal/Procurement/Sustainability.</p> <p>C3. Implement a community engagement manual.</p> <p>C4. Provide HR training for employees and critical contractors.</p> <p>C5. Monitor and track the performance of PQRs and HR-related complaints through the active grievance channel.</p> <p>C6. Monitor recruitment processes to ensure non-discrimination based on race, gender, or other conditions.</p> <p>C6. Maintain a Civil Liability Insurance Policy (coverage for third-party damages).</p>
2. Contractors and/or suppliers lacking good labor practices for HR protection or engaging in HR violations.		
3. Conflicts arising from improper engagement with stakeholders.		
4. Actions by Electro Dunas that affect Human Rights.		
5. Lack of information regarding HR-related complaints and grievances (PQRs, etc.).		
6. Lack of preventive and corrective management regarding HR issues.		

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
- **Employees:** All subsidiaries have a Diversity, Equity, and Inclusion (DEI) Committee responsible for ensuring compliance with the Human Rights Policy and the DDHH 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 has an Employee Relations Committee to manage workplace harassment complaints, in line with the established procedure.

Human Rights Remediation Plans

In cases where GEB identifies that it has caused or contributed to adverse human rights impacts, the company will reasonably cooperate to remedy such impacts through established grievance mechanisms, ensuring the implementation of corrective actions. (Remediation actions are available for all subsidiaries, including investee companies.)

Corrective actions:

In the context of possible human rights violations, any person who believes their rights have been affected can use the grievance channels to seek preventive, mitigation, or remedial measures. A differentiated approach will be applied depending on the case. If adverse impacts are identified, corrective actions may include:

- Rectification
- Restitution
- Compensation (financial or non-financial)
- Punitive sanctions (fines)
- Preventive measures such as court orders or guarantees to prevent recurrence of impacts

The **GEB Ethics Channel**, managed by an independent third party, receives complaints regarding potential human rights violations, ensuring confidentiality for all parties and enabling proactive management of any concerns. In 2024, the channel was used for human rights-related reports, allowing **a rapid and transparent** resolution of cases, with no significant violations identified.

GEB's Commitment:

Although no human rights violations have been identified in the past three years, GEB maintains its firm commitment to the remediation and mitigation of any potential future adverse impacts.

For more information:

- GEB Risk Management Policy: <https://www.grupoenergiabogota.com/en/content/download/31772/file/Risk%20Management%20Policy.pdf>
- GEB Ethics Channel (petitions, complaints and claims): <https://www.grupoenergiabogota.com/en/geb-group/ethics-and-compliance-program/ethics-channel>
- GEB Human Rights Webpage: <https://www.grupoenergiabogota.com/en/sustainability/social-performance/human-rights>
- GEB Code of Ethics: <https://www.grupoenergiabogota.com/en/geb-group/ethics-and-compliance-program/code-of-ethics>
- Intercultural Engagement Guidelines: <https://www.grupoenergiabogota.com/en/content/download/33987/file/Inter-Cultural%20Relations%20Guidelines%20283%29%20282%29.pdf>

Human Rights Assessment, Controls and Remediation – Business Group

1. Updated Human Rights risk assessments (2024)

- In 2024, new human rights risk assessments were conducted across own operations, contractors, and investee companies, under a strengthened methodology and broader scope:
 - ✓ 86% coverage of own operations in Colombia, Peru, and Guatemala.
 - ✓ Evaluation of 43% of Tier 1 contractors and suppliers, with risks identified in 89% of cases.
 - ✓ Self-assessment of human rights risks conducted with seven investee companies: Argo, Vanti, Enel, ISA REP, EMSA, and Promigas. Only Enel and Promigas have structured human rights due diligence systems, with identified risks and active mitigation plans.

2. New or strengthened controls

- Inclusion of human rights clauses in all contracts of GEB and its subsidiaries.
- Adoption of intercultural engagement guidelines to prevent community-level impacts.
- Human rights-based contractor evaluations.
- Strengthening of the Employee Relations Committee with a human rights focus.

3. Remediation approach

- GEB has accessible grievance channels and a clear protocol for managing situations that may constitute human rights violations.

4. Remediation Actions Implemented (2024)

- Strengthening of the Ethics Channel as an independent mechanism to receive human rights-related complaints.
- Proportional corrective measures applied according to each case:
 - ✓ Institutional rectification or apologies.
 - ✓ Non-financial compensation (internal adjustments, non-repetition guarantees).
 - ✓ Contractual sanctions in cases involving contractors.
- Monitoring of grievances (2021–2023) to identify recurrence or patterns.

5. Cases resolved without severe violations

- In 2024, human rights-related cases addressed through the Ethics Channel were resolved without identifying significant violations.
- Preventive actions and educational measures were applied in sensitive contexts.



Grupo Energía Bogotá



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