



Human Rights Assessment Due Diligence System

Human Rights Assessment



Due Diligence Scope at GEB:

GEB (Corporate and Transmission Branch)

Internal Information Sources Used

Interviews with stakeholders

65 interviews made

Communities

(5 interviews)

Chairpersons of
Community Action Boards

Contractors

(17 interviews)

O&M, Environmental,
Social, Security companies

Employees

(43 Interviews / 87
employees)

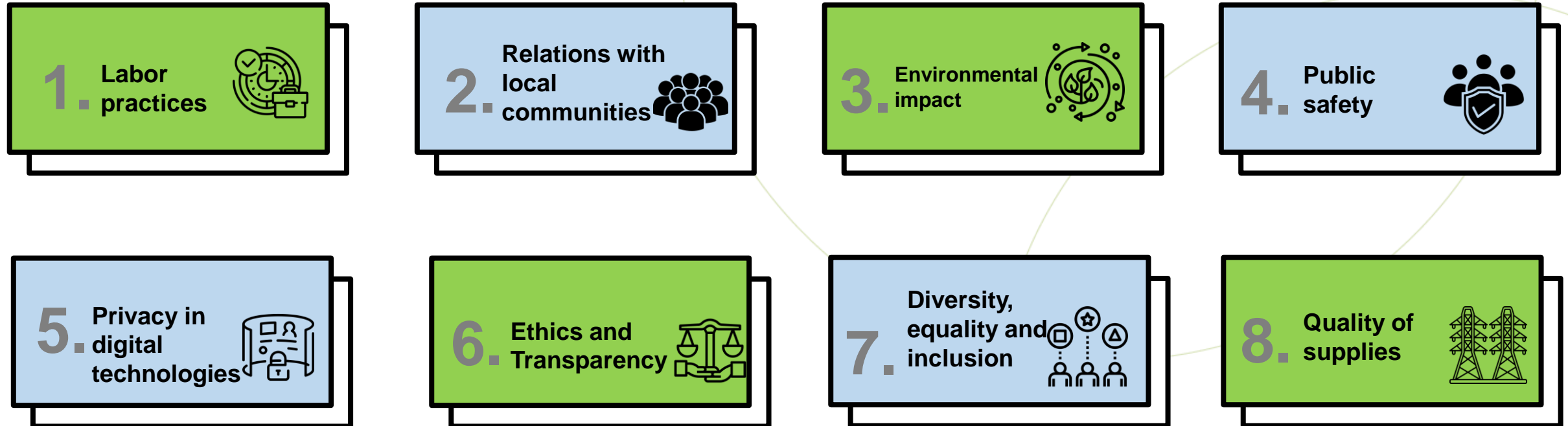
Vice Presidents, Department Heads
at the Corporate Office, Branch and
Subsidiaries

17 contractors assessed for
Human Rights, out of a total of
108 contractors of
Level 1 at GEB

$17/108: 0.16 \cdot 100 = 16\%$ of
Level 1 contractors
assessed for Human Rights
in the last 3 years

Areas of potential Human Rights impact

The identification of areas of impact took into consideration: the region (Latin America), the country (Colombia), and the sector (energy), as well as GEB's organizational diagnosis.



Human Rights Risk Management

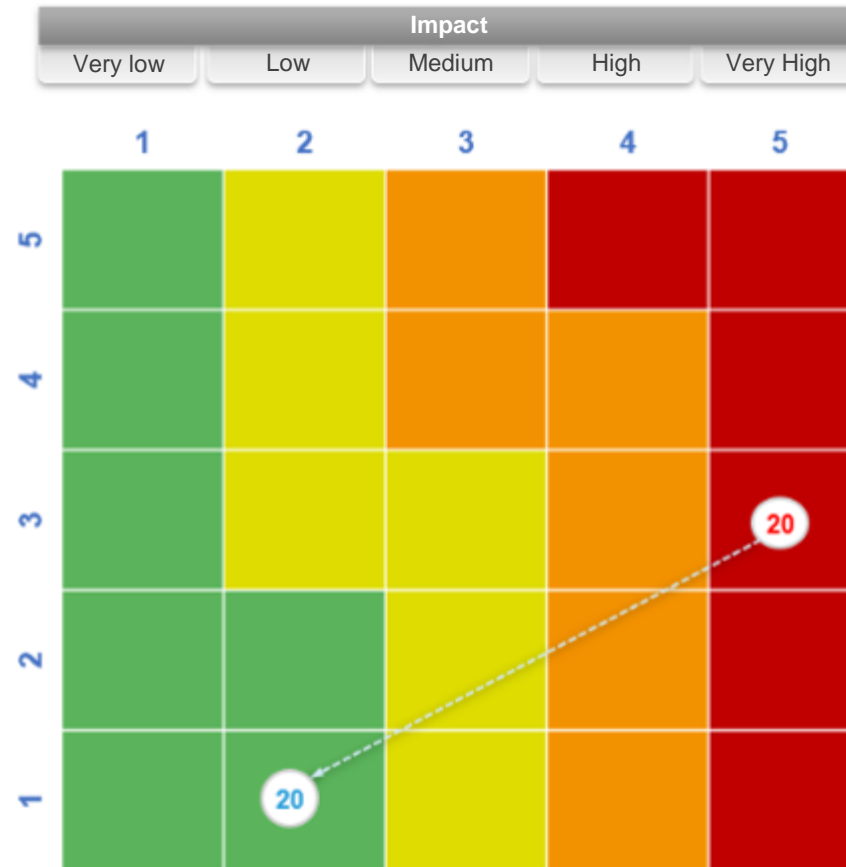


Approval of the inclusion of the risk of human rights violations in the Group's strategic risks matrix (*October 2022*)



Bi-monthly monitoring of risk with those responsible for risk controls

Risk 20: Violation of human rights by GEB, or by a GEB employee, partner or contractor



RI# Inherent risk/
Uncontrolled risk rating

RC# Controlled Risk/
Controlled Risk Rating

Main Human Rights Controls



Clauses for **contract termination** in the event of human rights violations



Guidelines for **community engagement**



Processes and **tools to prevent discrimination** in selection processes



Reporting channels for Human Rights claims



Human Rights/DEI training for employees and critical contractors



Monitor and follow up on performance of the PCCs and reports

Mitigation actions taken

Human Rights Risk: Violation of human rights by GEB, or by a GEB employee, partner or contractor

Possible causes	Possible Consequences	Controls / Response Plans	Responsible Party / Date
1. Not having a public commitment declaring respect for Human Rights.	Effects on reputation, financial penalties, disciplinary penalties, criminal penalties, losses from reparations for impacts, Interruption to operations.	C1. Implement, communicate and monitor compliance with the policy	Sustainability & Compliance Dept. / Dec. 2022
		C1. Implement a human rights due diligence process	Sustainability & Compliance Dept. / June 2022
		C1. Protocols for communicating human rights matters	Communications/ December 2022
2. Contractors do not have labor practices to ensure Human Rights protection.		C2. Clauses for contract termination in the event of human rights violations	Sourcing Department / January 2022
		C2. Human rights criteria in contractor assessments	Contract Supervision Dept. / Sept. 2022
		C2. Human rights component in the “contract complexity matrix”	Sourcing Department / December 2022
		C2. Human rights for subcontracting	Sourcing Department / December 2022
		C2. Human rights risks in the service contracting risk matrix	Sourcing Department / December 2022
3. Conflicts caused by mismanagement of relations with stakeholders.		C3. Guidelines for community engagement	Branch Sustainability Department / Dec. 2022
		C3. Crisis communications protocols with communities	Communications/ December 2022
4. Involvement of GEB, its employees or contractors in public order situations.	C.4. Community relations manual	Physical Security Department / Dec. 2022	
	C.4. Human rights training for contractors	Physical Security Department / Dec. 2022	

Mitigation actions taken

Human Rights Risk: Violation of human rights by GEB, or by a GEB employee, partner or contractor

Possible causes	Possible Consequences	Controls / Response Plans	Responsible Party / Date	
5. GEB actions that affect Human Rights	Effects on reputation, financial penalties, disciplinary penalties, criminal penalties, losses from reparations for impacts, interruption to operations, effect on GEB ratings in international standards (DJSI)	C.5 Human rights training plans for employees	Human Resources Department / Dec. 2022	
		C.5 Human rights training plans for critical contractors.	Sustainability & Communications / Feb 2022	
		C.5 Training plans on diversity, equality and inclusion for leaders and employees	Human Resources Department / Dec. 2022	
		C.5 Tools and processes to prevent discrimination in selection processes	Human Resources Department / Dec. 2022	
		C.5 Employee Relations Committee	Employee Relations Committee / Dec. 2022	
		C.5 Train the Employee Relations Committee on human rights and addressing claims	Human Resources Department / Dec. 2022	
6. Lack of information on Human Rights reports and claims (PCCs, etc)			C.6 Reporting channels for human rights claims	Compliance Department / Dec. 2022
			C.6 Monitor and follow up on performance of the PCCs and reports	Compliance Department / Dec. 2022
7. Lack of preventive and corrective management of Human Rights issues				C7. Adoption of the policy, instruments and indicators by subsidiaries
	C.7 Monitor human rights management at the subsidiaries			Sustainable Development Department / Dec. 2022
	C.7. Policies: ECL (Extracontractual Civil Liability), Civil Liability, personal accidents, compliance, etc.			Insurance Office / Dec. 2022



Grupo Energía Bogotá



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