



**GRUPO ENERGÍA BOGOTÁ S.A. E.S.P.**

**CODE OF ETHICS AND CONDUCT**

**June 2022**



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## I. Board of Directors Commitment

As members of Grupo Energía Bogotá's Board of Directors, we are convinced that the basis for ensuring the sustainability of the Group and its subsidiaries, as well as generating trust among all our stakeholders, is to have a culture of legality, ethics, and transparency, represented by our corporate value of INTEGRITY.

It is for this reason that GEB has established this Code of Ethics and Conduct as one of the essential elements of the organization, through which we seek to reflect the Group's commitment to the promotion and appropriation of conducts and behaviors that ensure the development of our operations and relationships with all our stakeholders in a responsible, legal, ethical and transparent manner, based on the values of Life First, Empathy, Focus on Results, Teamwork with Individual Responsibility and Integrity. This will enable us to manage and administer the risks of fraud, corruption, bribery, money laundering, terrorist financing, the financing of the proliferation of weapons of mass destruction, and conflicts of interest.

To this end, we hope and invite each of the recipients of this Code of Ethics and Conduct to know, internalize, and replicate with the greatest interest and commitment the guidelines included herein in their daily activities and in all aspects of their lives, both personal and professional.

The Board of Directors ratifies that GEB adopts an unwavering position of NO tolerance towards any deviation from the Group's ethical and legal framework, as well as a permanent commitment to fight against corruption, fraud, bribery, or any illicit activity, contributing to the correct development and operation of the markets.

We count on everyone to continue making Grupo Energía Bogotá a Group of integrity and transparency.

## II. Invitation from the President and Presentation of the Code

The Board of Directors of Grupo Energía Bogotá approved this Code of Ethics and Conduct, which contains the guidelines to continue strengthening our ethical culture and thus fulfill our higher objective of "Improving Lives with Sustainable and Competitive Energy". We are a business group in constant growth and consolidation, committed to the responsible and transparent exercise of our processes, as well as to building relationships with all our stakeholders based on trust, security, legality, ethics, and transparency.



To achieve the above, GEB's Chairman's Office and Senior Management are committed to complying with each of the guidelines and standards included herein, which are cataloged as mandatory for all the employees of the Business Group. Our challenge is to strengthen our value chain, generate growth and provide a high-quality service, achieving together the challenge of expansion that we have set ourselves and consolidating our position as a leading business group in the energy sector in Colombia and Latin America.

Our priority is to establish transparent and efficient communication mechanisms based on our corporate values. For GEB, the standards of ethical behavior constitute a fundamental element for the creation of value and the consolidation of relationships of trust with our environment, so we expect the provisions contained in this Code of Ethics and Conduct to be known and complied with, as well as those contained in GEB's other compliance standards, policies and procedures and best practices, strengthening and consolidating our culture of control and ethics.

We ratify our desire to continue building a market-leading business group, in which we develop our activities within the framework of legality and good practices, complying with the provisions of this Code of Ethics and Conduct. To this end, we count on each of you to develop your activities and operations in a manner consistent with our culture, committed to integrity, ethics and transparency.

### **III. OUR CODE OF ETHICS AND CONDUCT**

GEB's Code of Ethics and Conduct defines the standards of behavior that the organization expects of all its employees. This document should be considered as the roadmap for the development of all activities, operations, and processes of the Business Group, based on the ethical principles of transparency, respect, equity, legality, and responsibility.

### **IV. Scope**

This Code is addressed to the members of Board of Directors and employees of the Group and its subsidiaries. Likewise, the beneficiaries and relatives of our employees, customers, partners, and in general all the Counterparts of Grupo Energía Bogotá.<sup>1</sup> For this reason, all those to whom the Code is addressed must know, internalize, apply, and disseminate the provisions contained therein and ensure that their actions are always in line with the rules it stipulates, without prejudice to the observance of common sense and other criteria that correspond to proper and honest behavior.

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<sup>1</sup> Except for Contractors and Suppliers, to whom the Code of Ethics and Conduct for Contractors and Suppliers of Grupo Energía Bogotá (INCLUDE LINK) applies. For those matters that are not regulated in the Code of Ethics for Contractors and Suppliers, those included in this Code shall apply.



For their part, the other GEB companies must adopt the rules of this Code and ensure its dissemination and application.

## V. Our Corporate Values and Ethical Principles

The development of all our operations, relating to our stakeholders and the actions in the markets in which we operate our businesses are configured and carried out following corporate values, principles of behavior and action guidelines established by this Code.

These are our Corporate Values:

- **Life Comes First:** This is the value that drives us to take care of ourselves and those persons around us, ensuring that everyone goes home safe and sound at the end of the day.
- **Integrity:** Teaches us to work in an ethical, honest, responsible, and transparent way, remembering that even if no one is watching us, we must always act correctly.
- **Teamwork with individual responsibility:** Invites us to work in collaboration, constantly communicating among ourselves and generating trust. It reminds us that we all have a specific mission, that when it is joined with the missions of others, produces extraordinary results.
- **Focus on results:** Reminds us of the importance of working focused to achieve the expected results, and thus make our company a sustainable organization over time, that fulfills its role in society.
- **Empathy:** This value teaches the importance of respecting everyone's point of view, without discrimination and without bias in regard to beliefs, race, ideologies and other factors, so that we can elevate our humanity every day.

In addition, in compliance with the duties inherent to their positions, all Administrators and Employees of GEB and its subsidiaries must act under the following ethical principles:

- **Transparency:** Refers to how we conduct our management objectively, clearly, and reliably.
- **Respect:** Refers to how we interact, recognizing collective interests, individual diversity, sustainability of natural resources and institutions.
- **Equity:** Refers to how we act with justice and impartiality, seeking to cause positive and inclusive social impact.



- **Lawfulness**: Refers to conducting business activities in good faith and in compliance with applicable laws, rules and regulations.
- **Responsibilities**: Refers to making the highest and best effort to achieve business objectives in compliance with applicable laws, rules and regulations in force, as well as to guarantee the quality of the work performed and to be accountable for it.

## VI. Responsibilities of GEB's Management and Employees

At GEB we emphasize the importance that the members of the Boards of Directors, management, and employees, who are recognized as the ones in charge of proudly bearing the name of Grupo Energía Bogotá, know and internalize the responsibilities arising from this Code of Ethics and Conduct, some of which include:

- Know, adopt, and replicate the information contained in this Code and promote within the Business Group a culture based on our corporate values and ethical principles.
- Put the guidelines contained in this code into practice on a daily basis and in each of our actions.
- Contribute to the construction of a transparent operation and ensure the management and mitigation of the risks of fraud, corruption, bribery, money laundering, terrorist financing, financing the proliferation of weapons of mass destruction, conflicts of interest, and in general, all compliance risks identified in GEB's operations.
- Certify, when required, the knowledge, commitment and adoption of the guidelines included in this code.
- Conduct all operations, processes and procedures of the Group and its subsidiaries in an integral, legal, ethical and transparent manner.
- Report any inquiry, ethical dilemma and/or complaint to the ethics channel in good faith.
- Actively participate in all communication and training opportunities on Compliance initiatives, focused on ensuring a culture based on legality, integrity, ethics, and transparency.



- In a timely manner and with the required quality, provide the information requested within the framework of the internal verifications carried out by GEB's control departments.
- GEB's Senior Management will educate by example the compliance with the principles and values set forth in this Code.
- Senior Management shall constantly communicate to their work teams the need to comply with the guidelines included in this code, as well as ensure that no undue pressures are generated that go against the ethical framework of GEB and/or the corporate governance policies designed by GEB.

#### VII. **Guidelines for complying with applicable laws and internal regulations**

Grupo Energía Bogotá is committed to full compliance with the legislation in force and applicable to the prevention and mitigation of compliance risks in the countries where it operates.

The GEB is primarily concerned with regulatory provisions on the prevention and management of fraud, corruption, transnational bribery, money laundering, terrorist financing and financing the proliferation of weapons of mass destruction, information management and protection of personal data and, in general, of all applicable compliance risks.

##### **a. Prohibition of acts associated with fraud, corruption, and bribery.**

GEB is committed to a zero-tolerance policy against fraud, corruption, and bribery. In this regard it is forbidden to give, offer, grant, promise, insinuate, accept and/or request an improper advantage of any value, be it in cash or in kind, either directly or indirectly, to any third parties, including Providers, Contractors, and Public Servants, both domestic and foreign.

Employees must know, understand, and fully comply with the internal regulations that establish the guidelines to identify, detect, evaluate, mitigate, monitor, investigate, prevent, manage, control and correct the risks of fraud, corruption and bribery within GEB and in the development of its business activities.

##### **b. Conflicts of interest**

Employees face a conflict of interests whenever their independent and impartial judgment is compromised for the effects of performance of their duties, by having to choose between the interests of GEB and their own interests or those of a third party or related party.



Employees must act objectively, transparently, and impartially in the performance of their duties, which means that they must refrain from acting in situations of potential or actual conflicts of interest and manage them in accordance with the rules set forth herein. Said conflicts are defined as follows:

- **Personal conflict of interest** - A personal conflict of interest arises when my objectivity and independence is distorted by a personal relationship, or potential personal relationship, with persons who are or have been close to me, but with whom I have no blood, affinity, or civil relationship.

For example, former co-workers, classmates, childhood friends, best man or woman from a marriage, godfather, or godmother of children, among others.

- **Family Conflict of interest:** We may be facing a conflict of interest of this nature when our objectivity and independence is distorted by a relationship, or potential relationship, with relatives who are under the fourth degree of consanguinity, third degree of affinity, first civil degree or with our spouse or permanent partners, as well:

- Consanguinity

- First degree: Between parents and children
- Second degree: Between siblings, half-siblings, grandparents, and grandchildren
- Third degree: Between uncle and nephew
- Fourth degree: Between cousins

- Affinity

- First degree: Between in-laws and sons-in-law or daughters-in-law.
- Second degree: Spouse's siblings - Brother-in-law, sister-in-law.
- Third degree: Uncles, cousins of the spouse.

- Civil kinship:

- Between adoptive parents and adoptive children.

- **Economic Conflict of interest:** An economic conflict of interest, whether potential or real, arises when we are faced with situations of relationships with individuals or legal entities, with whom we have or may have had some type of prior relationship of a proprietary nature.





For example: Linking GEB as a supplier to a company of which I may have a connection as an administrator, shareholder, or other, accepting to be an external advisor to a company that has links with GEB, among others.

In any case, Employees must immediately inform their direct supervisor and the Compliance Department of any real or potential situation of conflict of interest in which they are or may become involved.

In case of doubts about the existence or not of a conflict of interest, a query must be submitted through the Ethics Channel for analysis.

Being in a conflict of interest is not, in itself, a punishable situation; however, failing to report a conflict of interest in a timely manner, or failing to refrain from making decisions when involved in a conflict of interest, may give rise to disciplinary sanctions in accordance with the applicable legislation in force in each country and in the respective Internal Labor Regulations of each GEB company.

In addition to the above, it is of vital importance to emphasize that all recipients of this code are obliged to maintain a duty of loyalty to the organization and its administrators, for this reason, employees must refrain from obtaining any personal benefit at the expense of the company, specifically (i) the use of company assets for purposes other than those for which they are intended, e.g., equipment, real estate, vehicles, offices, (ii) the diversion of business destined for GEB as a business attractor or its use, (iii) the improper use of information for personal benefit or for the benefit of a third party, among others.

GEB Employees must know, understand and fully comply with the Conflict-of-Interest Management Policy, which is published on GEB's website at all times:

- <https://www.grupoenergiabogota.com/content/download/17649/280728/file/Poli%C%81tica%20de%20Administracio%CC%81n%20de%20Conflictos%20de%20Intereses.pdf>

**c. Guidelines on Gifts and Gratuities**

Corruption and bribery are not limited to money. Therefore, GEB Administrators and Employees are prohibited from giving, offering, granting, promising, insinuating, accepting and/or receiving gifts and/or gratuities, including presents, hospitality, benefits, courtesies, etc., with the purpose of influencing their decisions or generating undue advantages for Contractors or Suppliers or any other individual or legal entity in accordance with the provisions of the Policy and Procedure for Gifts and Hospitality, which is available for consultation on GEB's website:



[file:///D:/lhernandezc/Downloads/Pol%C3%ADtica%20de%20Obsequios%20y%20Atenciones%20GEB%20V1%20\(1\).pdf](file:///D:/lhernandezc/Downloads/Pol%C3%ADtica%20de%20Obsequios%20y%20Atenciones%20GEB%20V1%20(1).pdf)

#### **d. Guidelines on donations, sponsorships, and political contributions**

GEB has social programs through which contributions are made for charitable and humanitarian purposes, such as in the event of natural disasters and humanitarian emergencies. It also participates in sponsorships whose sole purpose is to carry out advertising campaigns. To this end, sponsorships and donations must be duly approved and documented in accordance with internal procedures and must not be used (or perceived to be used) to receive an undue commercial advantage in return, nor must they include resources that are diverted for non-corporate purposes.

Under no circumstances may sponsorships or donations in cash or cash equivalents be granted, including but not limited to checks, loans, gift certificates or gift cards, or any benefit that can be exchanged for cash.

Likewise, GEB prohibits its employees from granting, in the name and on behalf of GEB, any type of political contribution, in cash or in kind, to any national or foreign political party, as well as Politically Exposed Persons (PEP), or from carrying out any type of political proselytism in GEB's facilities.

#### **e. Relations with public servants**

GEB and its subsidiaries maintain relations with public officials based on lawfulness, cooperation and transparency. Employees who, by reason of their responsibilities, have any kind of relationship with public officials (domestic or foreign), within the framework of the Group's activities, must act with professionalism and in compliance with the applicable legislation in force.

Employees must disclose whether they are classified as Politically Exposed Persons or whether their spouse, de facto or de jure, or a relative up to the second degree of consanguinity (father, mother, grandparents, grandchildren, children), second degree of affinity or first civil degree (spouse, father-in-law, daughter-in-law, son-in-law, spouse's child, brother-in-law) or whatever the legislation defines as such, are PEPs.

It is important to remember that the Foreign Corrupt Practices Act (FCPA) establishes the duty that we at GEB have adopted not to make payments to public officials, political parties, or candidates. For this reason, the FCPA makes it illegal to pay, offer, promise, or authorize cash or anything of value (entertainment, gifts, donations, hospitality, among others), directly or indirectly, to any foreign public official in order to influence his or her decisions and obtain an advantage or business in return.



In all cases, facilitation payments and lobbying expenses are expressly prohibited.

**f. Prevention of Money Laundering, Terrorist Financing and Financing the Proliferation of Weapons of Mass Destruction (AML/CTF/ FPADM)**

Money laundering, terrorist financing and financing the proliferation of weapons of mass destruction are conducts that affect States and society in general, since they allow or facilitate the concealment of money of illicit origin or destination and support organized crime.

GEB is committed to preventing the risks associated with money laundering, terrorist financing and financing the proliferation of weapons of mass destruction that may arise in the course of its business activities.

Therefore, during the development of their specific functions and competencies, the Managers and Employees of the GEB and its subsidiaries must implement the controls established therein to manage the risks associated with money laundering, terrorist financing and financing the proliferation of weapons of mass destruction, including the due management of internal procedures for the knowledge of the Counterparties and due diligence mechanisms, through which, as a minimum, the restrictive and control lists binding for Colombia and the countries where GEB operates are verified<sup>2</sup>.

Likewise, employees must be alert to warning signs and must report through the Ethics Channel any event, real or probable, associated with money laundering, terrorist financing and/or financing the proliferation of weapons of mass destruction. In addition, they must report through the Ethics Channel any unusual or suspicious transaction of which they become aware in the course of their duties. If said transaction is confirmed as suspicious or unusual, it must be reported by the Compliance Officer to the competent authorities.

In accordance with the above, employees must know, understand and fully comply with GEB's SIPLA Manual, which is published on our website:

- <https://www.grupoenergiabogota.com/content/download/25145/414208/file/Manual%20SIPLA.pdf>

**g. Contractual procedures**

The GEB promotes integrity and transparency in the markets in which it participates, and it requires all its managers and employees to comply with applicable regulatory provisions in all contractual procedures.

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<sup>2</sup> OFAC List (Office of Foreign Assets Control), UN List, U.S. Terrorist Organization List and European Union Terrorist List.



GEB exclusively develops and executes contracts awarded through transparent processes and performed within the limits of the law, and according to the provisions of the Contracting Manual in force. Information on competitor companies in selection and awarding processes shall only be obtained and used exclusively through legitimate means and purposes, as allowed by law, and in a manner compatible with loyalty and respect as required by GEB's good trade and business practices.

#### **h. Internal accounting**

GEB handles its accounting in a reliable and systematic manner, through an Internal Control system that ensures the development of processes and procedures that are detailed and accurate to handle transactions and assets. Likewise, GEB securely stores all the accounting records, with clear guidelines on information security and access to it.

Employees whose duties include executing domestic or international transactions must hold to these internal procedures set forth by GEB to this end and must enter documentary proof in the corresponding books. Also, any accounting or financial information that is or must be reported, either internally or externally, shall fulfill the criteria of exactness and accuracy.

#### **i. Information Management**

All information generated during the development of GEB business activities is considered a valuable asset, so its protection is of vital importance.

GEB understands that access to information must comply with the principles of transparency, good faith, non-discrimination, speed, efficiency, quality and proactive disclosure. Therefore, Employees must adopt all appropriate measures to safeguard their confidentiality, ensure their access, understanding and proper handling of the information they learn in the course of their duties and competencies.

Employees must refrain from using GEB's information, including any characterized as privileged and/or confidential, for purposes other than those expressly allowed by GEB. Likewise, they must maintain strict confidentiality with respect to negotiation processes, contractual processes, business relations, bidding and transactions, professional secrets and transactions in the securities market, among others.

The improper use of privileged and/or confidential information may even be subject to legal sanctions of a criminal nature. Therefore, Employees must refrain from using such information contrary to the internal policies of GEB and its subsidiaries, for their own benefit or for the benefit of any third party.



It is important to highlight that all information contained in GEB servers, networks, devices, equipment, operating systems, corporate e-mails, corporate cell phones or any other Information Technology (IT) or Operation Technology (OT) (software and/or hardware) component of GEB is not to be used for any other purpose, and is the property of the Group and its subsidiaries, which is why it is subject to control, review, copying and monitoring by the control areas, i.e. the Corporate Compliance Department and Internal Audit.

Employees must refrain from accessing and/or making improper use of the different technological accesses to computer systems or restricted sites, as well as the improper use of assigned system profiles, violation of software licenses, emphasizing that users and passwords are personal and non-transferable.

Moreover, employees must refrain from producing, reproducing, storing, distributing, or marketing copies of works, phonograms, videograms, books or software protected by copyright or related rights, without prior and express authorization from the respective owners, in accordance with the applicable regulations. Likewise, they must refrain from using, reproducing, or exploiting a computer program or software license without the prior and express consent of the owner.

#### **j. Personal Data Protection**

GEB is committed to adequately processing the personal data of its information holders, in full compliance with the regulations in force regarding Personal Data Protection. Given the above, GEB has a Personal Data Protection Program that guarantees the appropriate use and protection of personal data subject to processing by GEB in its capacity as the party responsible for processing personal data.

As a fundamental pillar of GEB's Personal Data Protection Program, it has a Personal Data Processing Policy through which it makes available to its owners the procedures and service channels established for the exercise of their rights of Access, Rectification, Cancellation or Opposition (ARCO); as well as the department responsible for processing queries and/or claims, processing purposes and forms, database validity, the information of the Data Controller, and other aspects of vital importance in the field of Personal Data Protection.

In case of doubts about aspects related to the Protection of Personal Data processed by GEB, information owners may contact the Personal Data Protection Officer, who is part of the Corporate Compliance Department, by e-mail at the following address [datospersonales@geb.com.co](mailto:datospersonales@geb.com.co)



Employees must know, understand and fully comply with the guidelines set forth in GEB's Personal Data Protection Program, especially those stipulated in the Personal Data Processing Policy, which is available at <https://www.grupoenergiabogota.com/datos-personales>.

#### **k. Anticompetitive practices**

GEB promotes the interests of the market in which it operates, as well as those of its consumers. Accordingly, we reject any practice that limits or threatens free competition or affects the welfare of consumers, promoting healthy and fair competition in the market.

### **VIII. Sustainability**

GEB has a Global Responsibility Policy which defines the guidelines within a framework of sustainable management and governs other corporate policies,

GEB strives for sustainable management of its businesses and activities, aimed at the creation of social, economic and environmental value, establishing the basis for adequate business performance and corporate decision making.

GEB's global responsibility structure seeks to carry out its business activities on the basis of relationships of trust and common benefit, always within the framework of legality.

The following are GEB's commitments in terms of global responsibility, which must be known and complied with by all Employees:

- Have a sustainable value chain.
- Improve the quality of life of the communities where we are present.
- Be an excellent workplace.
- Care for and respect the environment.
- Provide a service with world-class standards.

In addition, in keeping with its commitment to international standards such as the ten principles of the United Nations Global Compact, GEB promotes compliance with the following guidelines during the execution of its business activities:

#### **a. Respect for human rights**

One of the components of the GEB's strategy is compliance with applicable laws and regulations, both domestic and foreign, regarding the promotion and protection of human rights.



Therefore, all employees of the Group and its subsidiaries must act with social responsibility and respect for human rights, promoting a work environment in which dignity, respect and integrity prevail, as well as fair treatment with adequate working conditions for all employees and respect for their privacy, rejecting any situation of child, involuntary or forced labor.

This way, it prohibits, rejects and punishes all types of discrimination based on sex, gender, race, religion, nationality, political affiliation, and others. Furthermore, any situation of harassment (work and/or sexual), threats, intimidation and verbal, sexual, physical and/or psychological abuse is prohibited, rejected and sanctioned. Also, any type of retaliation for reporting any of these forms of harassment is prohibited and rejected.

#### **b. Labor Standards**

GEB is committed to complying with applicable laws and regulations, both domestic and foreign, on labor, occupational health and safety, providing guarantees for a safe working environment, as well as for the freedom of assembly and association of Employees, and the right to collective bargaining, as well as adopting proactive measures to prevent health and safety risks in the workplace and ensure fair and equitable remuneration.

Likewise, GEB promotes and encourages gender equity, diversity, and inclusion.

#### **c. Protection and Care of the Environment**

One of the pillars of GEB's sustainability strategy is environmental protection and care, which is why the following guidelines are mandatory for all employees of the Group and its subsidiaries:

- Compliance with all applicable laws and regulations, both domestic and foreign, related to protection and care of the environment.
- Adoption of initiatives to promote greater environmental responsibility.
- Implementation of an environmental responsibility policy.
- Adoption of systems to measure and monitor environmental protection performance.
- Reasonable and efficient use of natural resources in the development of business activities.
- Adoption of proactive measures for pollution prevention and waste reduction.
- Raise awareness of the importance of caring for the environment and natural resources in the development of business activities.



## IX. Prevention and rejection of sexual harassment

GEB rejects any and all types of sexual harassment conducts. Harassment is defined as any inappropriate or unwelcome conduct that may reasonably be considered or perceived to cause offense or humiliation to another person, in addition to that set forth in the definitions above.

Any form of harassment based on gender, gender identity and expression, sexual orientation, physical ability, physical appearance, race, nationality, political affiliation, age, religion or any other basis is prohibited in GEB's dealings with all its counterparties.

Sexual harassment can occur through any type of conduct, whether verbal, nonverbal or physical, including written and electronic communications, and can occur between persons of the same or different genders. The following is a non-exhaustive list of examples of sexual harassment:

- Making disparaging or derogatory comments about another person's sexual orientation or gender.
- Utilizing insulting or demeaning terms with sexual or gender connotations.
- Making comments of a sexual nature about appearance, attire, or body.
- Rating a person's sexuality.
- Repeatedly soliciting a person for dates or sexual relations.
- Unwanted touching of another person, including intentional pinching, patting, groping or rubbing.
- Making inappropriate sexual gestures, such as lewd movements.
- Sending communications with sexual content in any format.
- Sharing or displaying inappropriate sexual images or videos in any format.
- Committing or attempting to commit an act of sexual aggression, including rape.

The aforementioned conduct, as well as any other conduct that the potential victim considers to violate his or her sexuality, or the person who knows him or her, must be reported through the Ethics Channel, which is the means designated by the Group for this purpose.

## X. Ethics Channel and Whistleblower Protection

Employees must report through the Ethics Channel any violation of this Code of Ethics and Conduct, as well as any illegal or unethical act, misconduct, malpractice and/or non-compliance with GEB internal policies and standards.





It is important that Employees provide as much information and evidence as possible to facilitate the internal validation and verification process. Rumor transmission and dissemination activities without a basis and deliberately false or misleading information that is presented will not be subject to follow-up or review by GEB and may result in disciplinary sanctions in accordance with the applicable legislation in force in each country and in the respective Internal Labor Regulations of each GEB company.

The Ethics Channel is confidential, safe and reliable. An independent expert third party manages the Channel. And the only company department that has access to it is the Corporate Compliance Department.

Reports may be made anonymously; otherwise, GEB guarantees to protect the identity and confidentiality of the information contained in the report or inquiry to the greatest extent possible. In addition, any type of retaliation resulting from a report or inquiry through the Ethics Channel is prohibited.

The Ethics Channel has the following tools:

- Toll-free telephone numbers:
  - Colombia: 01800 518 9191
  - Peru: 705 22 33
  - Guatemala: 502 2378 4852
- E-mail: [canaleticogeb@ethicsglobal.com](mailto:canaleticogeb@ethicsglobal.com)

When a report or inquiry is made through the Ethics Channel, it is assigned a case number. The Employee making a report or inquiry must establish a password for follow-up or, if necessary, an extension of the report or inquiry. GEB will report the result from the preliminary verifications or investigations that are performed, or the response to the inquiry through the same channel.

## **XI. Penalties for Non-compliance**

Failure to comply with the provisions contained in this Code of Ethics and Conduct may result in disciplinary sanctions in accordance with the applicable legislation in force in each country and in the respective Internal Work Regulations of each GEB company.

The foregoing without prejudice to the legal or contractual sanctions of a civil, administrative and/or criminal nature which may be applicable, according to the respective infraction.



## XII. Definitions

**Shareholders:** Natural persons or companies that have made a contribution in cash or other assets that can be valued in cash to GEB in exchange for shares.

**Sexual harassment:** "Anyone for his own benefit or that of a third party and taking advantage of his manifest superiority or relations of authority or power, age, sex, work, social, family or economic position, harasses, persecutes, stalks or physically or verbally assaults, for non-consensual sexual purposes, another person" (Article 210-A Colombian Penal Code).

**Senior Executives:** refers to the Administrators, President, Vice Presidents and Department Directors as a whole.

**Managers:** Refers to the registered agent, the liquidator, the factor, the members of boards or councils of directors and those who, in accordance with the bylaws, exercise or hold these functions within GEB.

**Ethics channel:** Mechanism that allows (i) reporting any violation of this Code of Ethics and Conduct, as well as any illegal or unethical act, misconduct, malpractice, or violation of GEB's ethical framework in the development of GEB's activities or those of its Employees, (ii) reporting any non-compliance with GEB's internal policies and standards, and (ii) the means by which inquiries can be made and clarifications sought on ethical dilemmas.

**Counterparties:** Individuals or legal entities with which GEB has or seeks to have a work, legal, commercial and/or business relationship during the execution of its corporate purpose. Including but not limited to: (i) Shareholders; (ii) Employees; (iii) Suppliers; (iv) Contractors; (v) Partners.

**Contractors:** Individuals or legal entities with which GEB enters into a contract or service order for the provision of services to GEB.

**Employees:** Individuals bound to GEB through a work or learning contract that provide services under supervision and in exchange for compensation. This includes Managers.

**GEB:** Refers to Grupo Energía Bogotá S.A. E.S.P., its affiliates, and subsidiaries.

**Stakeholders:** Refers to natural or legal persons interested in and/or affected by GEB's business activities. Including but not limited to: (i) Counterparties; (ii) communities; (iii) markets.



**Facilitation payments:** Payments to Public Servants to expedite the performance of duties of a non-discretionary nature, which are intended to influence the actions of Public Servants, but not their outcome (e.g., payments made to obtain a permit or license).

**Suppliers:** Natural or legal persons with which GEB has or intends to have a legal, commercial and/or business relationship for the provision of goods, services and/or products to GEB.