

Certificate of the Compliance Program for Grupo Energía Bogotá S.A. E.S.P - GEB

TO WHOM IT MAY CONCERN

GEB upholds the highest standards of conduct and corporate compliance, having established a Compliance Program designed to safeguard the company's integrity, ensure reasonable assurance over its Financial Statements, and support the achievement of set goals. This is achieved through a culture rooted in ethical behavior, transparency, and adherence to the regulatory framework, fostering trust and security among our employees and all stakeholder groups we engage with.

The Senior Management actively promotes a culture dedicated to combating money laundering, terrorism financing, the proliferation of weapons of mass destruction - ML/TF/FPWMD, fraud, bribery, corruption, conflicts of interest, personal data protection, and fair competition. This is ensured by strict adherence to governing laws and best practices in mitigating such risks, structured around three core areas of the Compliance Program: (i) prevention, (ii) detection, and (iii) response.

Outlined below are the key documents that provide guidelines on ethics and compliance applicable to all interested parties:

- a. Employee Code of Ethics and Conduct
- b. Code of Ethics and Conduct for Suppliers and Contractors
- c. Control Architecture Policy
- d. Policies and Corporate Ethics, Anti-corruption and Anti-bribery Manual
- e. Personal Data Protection Policy, Manual, and associated procedures
- f. Gifts and Hospitality Policy and Conflict of Interest Policy
- g. ML/TF/FPWMD Prevention and Control Manual and Related Procedures
- h. Internal Work Regulations

These and other corporate documents are accessible via the following links:

<https://www.grupoenergiabogota.com/gobierno-corporativo/politicas-corporativas>

<https://www.grupoenergiabogota.com/conoce-geb/programa-de-etica-y-cumplimiento>

Key Elements of GEB's Compliance Program:

1. Compliance Report Presentation: Biannually, the Corporate Compliance Director reports to the Board of Directors, detailing the management and progression of various activities within the Compliance Program.
2. Training, Communications, and Employee and Stakeholder Education regarding the Compliance Program: The Company design an annual communications and training program targeted at our collaborators, Senior Management, Board of Directors, administrators, suppliers, contractors, and customers. This program supports the ethical culture of GEB and its subsidiaries and provides the necessary tools for understanding compliance risks and the controls needed to mitigate them. It also fosters behaviors rooted in integrity and other corporate values, encouraging exemplary conduct throughout the organization.
3. Compliance Risks: Compliance risks are identified, assessed, controlled, and monitored in alignment with the Entity's Risk Management Policy.

4. Internal Control: The Internal Control System is built on the principles of self-control and self-management, empowering each employee to manage risks and ensure control effectiveness, thereby facilitating the achievement of both individual and organizational goals.
5. Due Diligence and Enhanced Due Diligence Procedures: The Company has instituted both standard and enhanced due diligence processes to identify potential alerts concerning stakeholders and ensure adherence to regulatory guidelines.
6. Monitoring and Corrective Actions: The Compliance Program operates under the principle that any ethical misconduct or deviation that cannot be preemptively mitigated must be promptly detected and corrected through timely and effective responses, including appropriate corrective actions.
7. Biannual Verification by the Statutory Auditor: The Statutory Auditor ensures adherence to the controls outlined in both internal and external regulations aimed at preventing ML/TF/FPWMD proliferation, and issues opinions on the financial statements. To date, there have been no adverse findings in this regard.
8. Whistle-Blowing Channel: The Company maintains an Ethics Channel, overseen by an independent third party, facilitating the submission and management of complaints and ethical dilemmas through the Corporate Compliance Department. Furthermore, GEB provides a Whistleblower Protection Guide, available at: <https://www.grupoenergiabogota.com/#Canal-Etico>
9. Personal Data Protection: The Company operates a Personal Data Protection Program, ensuring compliance with the Colombian Personal Data Protection regulations. The Program is accessible here: <https://www.grupoenergiabogota.com/conoce-geb/programa-de-etica-y-cumplimiento/proteccion-datos>
10. Engagement with the Fiscal Control Entity: As GEB is predominantly owned by the District, we are under the fiscal oversight of the Office of the Comptroller of Bogota.

In line with the above, I hereby affirm that the Company has been complying with all applicable internal and external regulations regarding the components of the Compliance Program, pursuant to the prevailing laws applicable to GEB's legal nature.

Sincerely,

[ORIGINAL SIGNED]

LUZ ELENA DÍAZ GARCÍA
Corporate Compliance Director
Period 2024