



GUIDE TO UNDERSTANDING AND MANAGING CONFLICTS OF INTEREST

What is a Conflict of Interest?

Employees are in a conflict of interest when their independent and objective judgment is impaired in carrying out their responsibilities, having to choose between the interest of Grupo Energía Bogotá, the subsidiary, and their own, that of a third party or a related party.

Employees must act objectively, transparently, and impartially during the performance of their duties, which means they must refrain from acting in situations of potential or actual conflicts of interest, as well as managing them in accordance with the provisions of the Code of Ethics and Conduct.

Why is it important to prevent conflicts of interest from arising?

Conflicts of interest jeopardize the obligation to ensure that the Company's interest always prevails over the personal, family, or economic interests of the employees, their beneficiaries, managers, or other related parties.

Therefore, all conflicts of interest must be managed preventively, preserving independence of judgment and mitigating the materialization of compliance risks.

What types of conflicts of interests exist?

1.

Personal

2.

Family

3.

Economic



Personal conflict of interest

It is configured when our objectivity and/or independence is distorted by a relationship, or potential relationship, with individuals who are or have been close or with whom there is a clear enmity, WITHOUT any links of consanguinity, affinity, or civil ties. For example, close friends, former work colleagues, study partners, godparents of marriage or children, among others.

Example:

If, in a human talent recruitment process in which I must assess the participants, one of the candidates for the position is a person with whom I had a previous close or relevant work relationship or a strong enmity.

Family Conflict of interest:

A conflict of interest of this nature arises 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 follows:



Consanguinity

First degree:

Parents and children

Second degree:

Siblings, half-siblings, grandparents and grandchildren

Third degree:

Aunts, uncles, nephews and nieces

Fourth degree:

Cousins

Affinity

First degree:

In-laws and children-in-law

Second degree:

Spouses' siblings, Spouses' brothers-in-law, sisters-in-law, and grandparents

Third degree:

Spouse's aunts, uncles, cousins and great-grandparents

Civil kinship:

Adoptive parents and adoptive children

Examples:

If both my uncle and I work at Grupo Energía Bogotá (GEB) or one of its subsidiaries, and even though we perform our duties in independent areas, my uncle is the auditor of an agreement for which I must approve the policies or any other contractual requirement.

If I am a supervisor of a GEB contract or subsidiaries and I must oversee or perform any role of auditing, follow-up, or control regarding a contractor or supplier in which my father/husband/cousin/half-brother -or any other person according to the affinity bonds stated- serves as an administrator, treasurer, owner, or commercial.



Economic Conflict of interest:

Occurs when we are faced with situations of interaction with individuals or legal entities, with whom we have some kind of previous financial relationship.

Example:

Linking GEB or its subsidiaries as a provider a company of which I am a registered agent, shareholder, board member or other, accepting to be a Counsel of a company that has connections with GEB or its subsidiaries, among others. In general, any situation in which you may obtain any direct or indirect economic advantage resulting from an action, omission, or decision derived from my link with Grupo Energía Bogotá or its subsidiaries.

Categories of Conflicts of Interest

To understand the different categories in which the various types of conflicts of interest can arise

Actual:


I must negotiate the value of a rights of way where a project of Grupo Energía Bogotá (GEB) or one of its subsidiaries will pass through, and the property belongs to my parents.

Potential:

I must evaluate the proposals for a technological project, and among the proposers, a company for which I worked a few years ago could be involved.

Apparent:

In this case, there is no conflict of interest since the staff member does not have a personal or private interest, but a third party could reasonably think otherwise. For instance, an associate is responsible for carrying out an open competitive process for the recruitment of a supplier. One of the suppliers participating in the selection process has a name very similar to that of a company where the collaborator was previously employed before joining GEB or one of its subsidiaries. However, this is a mere coincidence, and there is no relationship between the company for which the collaborator worked and the one being presented in the competitive process.



What should I do when facing a situation in which I have doubts or certainty that there is a potential or actual conflict of interest?

Employees must immediately report the situation through the ETHICS CHANNEL, refraining from acting or making any decisions while the case is being analyzed and the corresponding guidelines are issued.

Is the existence of a conflict of interest a punishable situation?

Merely the existence of a conflict of interest does not, in itself, constitute a punishable situation. However, refraining from disclosing that situation and not reporting a real or potential conflict, or not raising the query in case of doubt, is a deviation from the organization's ethical framework and leads to disciplinary sanctions in accordance with the current law applicable in each country and in the respective Internal Work Regulations of each GEB company. I can also report identified conflicts involving third parties, for example, when the person referring their university friend is the one conducting the interview. Such conflict or doubt could also be brought up by a talent management collaborator.

What are the collegiate bodies and what are their differences?

- a. Corporate Ethics and Compliance Committee:** The Compliance Committee is composed of the Legal Vice President, the Talent Management Director, and the Compliance Director. Its purpose is to contribute to the strengthening of ethical behavior in the Company. Be aware of reports involving an employee of the Company.
- b. Audit and Risk Committee:** Be aware of reports involving any of the members of the Ethics Committee, the President, or the Auditor. Every two months, you are informed of all the complaints processed by the Compliance Department and presented to the Ethics and Compliance Committee.
- c. Employee Relations Committee:** The Committee is responsible for receiving and processing confidentially the claims submitted that describe situations that may constitute workplace harassment and formulating recommendations for the development of preventive and corrective measures for workplace harassment.

Pathways to the ethical channel:

Toll-free telephone numbers:

Colombia: 01800 518 9191

Peru: 705 22 33

Guatemala: 502 2378 4852

Web page: [Haz clic aquí](#)

Email: canaleticogeb@ethicsglobal.com

Remember:

FAILING TO TIMELY DISCLOSE A CONFLICT OF INTEREST OR AN ETHICAL CONFLICT, OR FAILING TO REFRAIN FROM ACTING WHEN A CONFLICT OF INTEREST OR ETHICAL CONFLICT EXISTS, CAN BE AN ACT OF CORRUPTION