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Definitions

**Message from the President**

Grupo Energía Bogotá, in the development of its higher purpose, in each of its actions as a business group has an unwavering commitment to integrity, legality, ethics and transparency.

As a Group and as individuals, we interact permanently with our stakeholders through constant and effective communication, based on our corporate values. Likewise, we adopt and honor a zero-tolerance stance towards any unethical and/or illegal conduct, particularly towards events of fraud, money laundering, terrorist financing, financing the proliferation of weapons of mass destruction, violation or improper handling of personal data, restrictive competition practices, corruption, bribery, and/or transnational bribery, among others.

We are a Business Group that improves lives through sustainable and competitive energy, contributing to the economic, social, and environmental prosperity of our stakeholders and the countries in which we operate, through the work of a committed, transparent, innovative, efficient, and empathetic team.

Our Suppliers and Contractors are fundamental in the achievement of our higher purpose, through the respect of our corporate values, as well as in the effectiveness and thoroughness of our commitment to comply with the highest standards of integrity, legality, ethics, transparency, and professional and human quality.

This Code of Ethics and Conduct for Suppliers and Contractors defines the guidelines and minimum standards that all our Suppliers and Contractors have the duty to respect and comply with, in a responsible manner, in all their interactions with GEB and its counterparties and stakeholders. This is the only way to build solid, sustainable, and transparent commercial relationships, based on trust and respect, and on the highest ethical and regulatory standards, which will allow us to obtain quality results that will undoubtedly contribute to the institutional, economic, and social strengthening of the regions where we operate.

I invite you to make this document come alive in each of your actions and interactions, when making decisions, in your daily work and in your life in general, with coherence and integrity.

### Scope

This Code of Ethics and Conduct for Suppliers and Contractors is a regulatory and consultative document, mandatory for all Suppliers and Contractors of GEB, as well as their third-party intermediaries, including, where applicable, their parent companies, subsidiaries, and/or affiliates, as well as GEB employees involved in contract management and in the agreements to be signed with contractors.

It is the responsibility of Suppliers, Contractors, and Third-Party Intermediaries to adopt, honor, and disclose this Code of Ethics and Conduct for Suppliers and Contractors to their employees and subcontractors, effectively verifying its communication and compliance.

### Compliance

Suppliers and Contractors must fully comply with all laws, contractual and corporate provisions, adopt the best business practices and the highest standards of ethics in business, as well as the guidelines and rules detailed in this Code.

Similarly, they must comply with the provisions contained in the other standards, policies, and compliance and good practices procedures of GEB, including, but not limited to: the Code of Ethics, the Control Architecture Policy, the Anti-Corruption and Anti-Bribery Business Ethics Policy, the Manual for the Prevention of Money Laundering, Terrorist Financing, and the Financing of the Proliferation of Weapons of Mass Destruction (ML/TF/FPWMD), the Human Rights Policy, the Personal Data Processing Policy, the Information Security and Cybersecurity Policy, confidentiality agreements, among others.

Knowledge, dissemination and acceptance of this Code of Ethics and Conduct for Suppliers and Contractors is a prerequisite for the execution of all contracts, agreements, legal business, and other documents signed between GEB and the Suppliers or Contractors, emphasizing that in the case of suppliers and contractors that have their own compliance policies, these shall be proposed for evaluation by GEB through the Compliance Department.

The standards of this Code of Ethics and Conduct for Suppliers and Contractors do not replace, but rather complement, the provisions of any contract, agreement, or document between GEB and the Suppliers and Contractors.

GEB reserves the right to verify compliance with the Code of Ethics and Conduct for Suppliers and Contractors, through internal or external assessment mechanisms, directly or indirectly through third parties, in which we expect the support and good disposition from our Suppliers and Contractors.

### General Guidelines

#### 1. Ethics and Corporate Values

This Code of Ethics and Conduct for Suppliers and Contractors is based on GEB's corporate values, which define the behavior expected from each of our Suppliers and Contractors:

**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:** It is the value that allows us to act in a coherent, upright, honest, fair, and objective manner; it is the component that leads us to act in a transparent manner before GEB and all our stakeholders, in order to achieve our objectives.

**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 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, Suppliers and Contractors must act under the following ethical principles during all stages of the relationship with GEB, pre-contractual, contractual, and post-contractual:

**Transparency:** Refers to managing in an objective, clear and verifiable manner, as from the submission of bids in GEB's contracting processes.

**Respect:** It refers to how we interact, recognizing collective interests, individual diversity, sustainability of natural resources and institutions.

**Equality:** It refers to how we act with justice and impartiality, seeking to cause positive and inclusive social impact.

**Lawfulness:** Refers to carrying out business activities subject to the applicable laws, rules and regulations, as well as the conditions agreed upon in the contracting processes and in the contracts or agreements entered into with GEB.

**Responsibility:** It refers to making the highest and best effort to achieve business objectives in compliance with the current applicable laws, rules and regulations, as well as to guarantee the quality of goods and/or services and to be accountable for them.

**Good Faith:** Refers to acting in its pre-contractual, contractual, and post-contractual relations with the GEB in good faith.

#### 2. Duties and Obligations of Suppliers and Contractors

Below are the duties and obligations of the suppliers and contractors, who must fully observe and comply with them within the framework of their commercial and/or contractual relationships with GEB:

- Submit offers or proposals with fair values

- Refrain from submitting offers with artificially low prices or violating good and healthy competitive practices.
- Avoid providing false, inaccurate, or misleading information.
- Ensure compliance with copyright, intellectual property, information security, personal data protection and other internal and external regulations that must be complied with.
- Duty to act in good faith, loyalty and collaboration, in the sense of providing information that should be known by GEB in connection with the execution of the contracts or related to any other kind of information that may be of interest to GEB and affect its reputation.
- Report through the established channels for this purpose (ethics channel) any situation that may be considered or constitute a conflict of interest, whether personal, family-related, or economic.
- Report through the ethics channel any situation that may involve a violation of GEB's ethical, legal and regulatory framework, such as violations of the code of ethics and conduct, policies, illegal or unethical conduct, violation of internal procedures, among others.

### 3. Fraud, Corruption and Transnational Bribery Prevention

GEB is committed to a zero-tolerance policy towards fraud, corruption, and bribery in all its forms, including transnational bribery.

Therefore, GEB's Suppliers and Contractors must have internal policies, standards, or guidelines that allow them to identify, detect, assess, mitigate, monitor, investigate, prevent, manage, and control the risks of fraud, corruption, transnational bribery, money laundering, terrorist financing, personal data protection, violation of competition rules, and in general, any unethical and/or illegal conduct in the development of their economic and contractual activities, and in their relationships with GEB, in accordance with both national and international regulations, such as Law 2195 of 2022, the Foreign Corrupt Practices Act (FCPA), the OECD Anti-Bribery Convention, United Nations Conventions, among others.

#### **At the very least, Suppliers and Contractors must:**

- Ensure ethics, transparency, legality and good faith in their actions and business, as well as in the development of their activities and operations.
- Ensure that the money or resources received from GEB within the framework of the respective relationship will be used solely and exclusively for lawful activities.
- Implement relevant actions to detect, prevent, control, and manage events of Fraud, ML/TF/FPWMD, Personal Data, violation of free competition, Corruption, and Transnational Bribery.
- Mitigate legal, operational, reputational, and economic risks arising from events or activities associated with Fraud, ML/TF/FPWMD, personal data processing, competition law, Corruption, and/or Transnational Bribery.
- Immediately report to GEB any event of Fraud, ML/TF/FPWMD, violation of personal data, violation of free competition regime, Corruption and/or Transnational Bribery through its Ethics Channel.
- Ensure that the goods and resources used for the development of its corporate purpose and the contractual activities agreed with GEB come from lawful activities and relationships.

- Refrain from offering, granting, promising, accepting, insinuating, receiving, or requesting an undue advantage of any value from GEB employees, whether in money or in kind, directly or indirectly, for their own benefit or that of a third party, for their own benefit or to benefit national or foreign public officials.
- Avoid delivering and/or promoting facilitation payments in relation with their counterparties.
- Refrain from engaging in lobbying activities, through intermediaries and/or any third party on behalf of GEB.
- Ensure and respect free business and economic competition, avoiding practices such as collusion, restrictive practices, or cartelization, among others.
- Manage their accounting in a safe, reliable, and systematized manner, complying with the applicable laws and regulations in force, ensuring that the accounting records truthfully and reliably reflect the financial reality.
- Conduct due diligence and know the counterparty of each subcontractor that engages with the supplier and/or contractor, promoting the contracting of counterparties not involved in investigations or with reputational impacts related to acts of corruption and/or bribery.

If there are no internal policies, rules, or guidelines for preventing and controlling fraud, preventing money laundering/terrorism financing/financing of the proliferation of weapons of mass destruction, protecting competition, corruption, and bribery, or if these are deemed insufficient in the context of the relationship with GEB, Suppliers and Contractors must adhere to GEB's internal compliance policies and rules related to the subject, emphasizing that in case of discrepancy between norms, priority must be given to compliance with and applicability of GEB's norms.

#### **4. Gifts and Gratuities**

Suppliers and Contractors of GEB may not offer, promise, grant, accept, hint, receive, or request gifts and gratuities from any GEB employee and/or manager, unless they are promotional items intended for positioning and brand recall, which must be reasonable for this purpose and not exceed a maximum value of USD 30 or its equivalent in other currencies (including, but not limited to: pens, diaries, calendars, umbrellas) in the same calendar year.

Suppliers and Contractors may invite GEB's executives and employees to events and/or celebrations. For acceptance, the internal procedure defined for these situations must be followed. In addition, the Suppliers or Contractors, as the case may be, may not cover travel, lodging and per diem expenses, if required; these shall be assumed by GEB.

Suppliers and Contractors must refrain from: (a) making invitations to events that are not related to the contractual, social and/or economic purpose of GEB, for example, theater plays, tourism trips, places where men and women are used as an element of distraction or in a denigrating manner, among other things, (b) that have as their object any requirement, consideration or something that may represent a potential conflict of interest, (c) cash or equivalent, such as bonuses, (d) any consideration that may be reproachable from the point of view of transparency and moral good business practices.

In any case, Contractors and Suppliers must fully comply with GEB's gift and hospitality policy.

## **5. Conflicts of Interest**

Suppliers, Contractors, and in general, stakeholders of GEB find themselves in a conflict of interest situation when their independent and objective judgment is limited, having to choose between the interest of GEB and their own, that of a third party, or that of an affiliated party. Suppliers and Contractors must act in good faith, with transparency and impartially during the fulfillment of contractual obligations, which means they must refrain from incurring in conflicts of interest.

In any case, GEB expects Suppliers and Contractors to assess and report immediately, through the Ethics Channel, any actual or potential conflict of interest in which they are or may become involved, as well as those of which they are aware in the context of their relationship with GEB, including potential conflicts of interest of GEB employees.

Conflicts of interest are defined as follows:

### **Personal Conflict of Interest:**

A conflict of interest arises when objectivity and independence is distorted by a relationship with persons who are or have been close to the individual, but with whom there is no blood, affinity, or civil relationship.

For example, former colleagues, classmates, childhood friends, godparents of marriage or children, romantic partners, unmarried partners, emphasizing that by becoming spouses or permanent partners, a family conflict of interest is configured, among others.

### **Family Conflict of interest:**

It arises when our objectivity and/or independence is distorted by a 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 adopted children.

### **Economic Conflict of interest:**

An economic conflict of interest, whether potential or real, arises when we face situations of relationships with individuals or legal entities with whom we have or may have had some type of prior relationship of a financial nature, or due to the performance of activities that involve competition with the company's corporate purpose.

For example: Linking GEB as a supplier to a company of which I am a registered agent, shareholder, board member or other, accepting to be an external advisor to a company that has links with GEB, or being an intervenor and/or supervisor of contracts in which there is some economic interest, among others.

GEB's suppliers and contractors must have conflict of interest management mechanisms within their organization to prevent situations that may interfere with their relationships with GEB.

#### **6. Prevention of Money Laundering, Terrorism Financing, and the Financing of the Proliferation of Weapons of Mass Destruction (ML/TF/FPWMD)**

GEB is committed to a zero-tolerance policy against ML/TF/FPWMD and defines prevention mechanisms against these scourges and associated risks such as contagion risk, legal risk, operating risk, and reputational risk. GEB Suppliers and Contractors shall have internal policies, standards or guidelines that allow them to prevent, mitigate, control and manage the risks associated with Money Laundering, Terrorist Financing and the Financing the Proliferation of Weapons of Mass Destruction, in accordance with the regulations applicable to the exercise of their economic activity.

At the very least, Suppliers and Contractors must:

- Ensure that the money or resources received from GEB within the framework of any contractual or business relationship will be used solely and exclusively for lawful activities.
- Design and implement procedures to get to know their respective counterparts and their final beneficiaries and/or real beneficiaries.
- Implement applicable actions to detect, prevent, control and manage events and/or suspicious operations of Money Laundering, Terrorist Financing and Financing the Proliferation of Weapons of Mass Destruction.
- Mitigate legal, operational, and economic risks derived from events or activities associated with Money Laundering, Terrorist Financing and Financing the Proliferation of Weapons of Mass Destruction.
- Report any transaction that may constitute Money Laundering, Terrorist Financing, and Financing of the Proliferation of Weapons of Mass Destruction that may involve GEB through the Ethics Channel.
- Ensure proper understanding of counterparties through fully defined due diligence procedures, implementing enhanced due diligence measures towards PEPs.
- Execute basic due diligence and enhanced due diligence mechanisms according to the level of risk each counterparty represents.
- Design and implement monitoring mechanisms for its counterparties.
- Communicate and justify to GEB the need to subcontract any type of service or activity included in the agreement signed with GEB.
- Perform due diligence and knowledge of counterparties for each subcontractor linked to the supplier and/or contractor, promoting contracting with counterparties that are not linked to domestic or international restrictive lists or associated with money laundering, terrorist financing or related crimes.

GEB's Suppliers and Contractors 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.

Some warning signs to consider regarding ML/TF/FPWMD are:

- Counterparties named in information requirements by competent authorities.
- Unjustified increase in assets.
- The counterparty is listed in binding and/or sanctions lists and/or with offenses related to ML/TF/FPWMD, fraud, bribery, and/or corruption.
- Cash payments and/or transactions. v) Relationships with sanctioned countries and/or parties, among others.

Unusual operations are transactions whose amounts or characteristics are not related to the ordinary or normal economic activity of the Business Group, which, due to their number, quantity, or characteristics, do not fit within the guidelines of normality or ordinary business practices in a sector, an industry, or with a type of Counterparty or stakeholder group, for which these types of operations must be reported in a timely manner.

If no policies, standards, or guidelines are in place for the prevention and control of Money Laundering, Terrorist Financing and Financing the Proliferation of Weapons of Mass Destruction, or if these are insufficient within the framework of their relationship with GEB, Suppliers and Contractors must adhere to GEB's Manual on the prevention of ML/TF/FPWMD, which is published on GEB's website and can be consulted at the following link:

<https://www.grupoenergiabogota.com/conoce-geb/programa-de-etica-y-cumplimiento/prevencion-de-lavado-activos-y-financiacion-del-terrorismo>

## **7. Protection of Free Competition**

GEB promotes the interests of the market in which it carries out its activities and is committed to promoting behaviors and conducts that ensure the proper development of its operations. 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.

Based on the principles of this Code, our corporate values and within a framework of integrity, below we detail the behaviors that all our Suppliers and Contractors must adopt:

**Regulatory Compliance:** Strictly comply with Colombian law on competition and regulations issued by the Superintendence of Industry and Commerce.

**Prohibition of Collusion:** Forbid any form of collusion seeking to manipulate the market, including prior agreements on prices, sales conditions, or participation in bidding processes.

**Avoiding the Agreed Distribution of Processes:** Do not establish distribution agreements with other competitors that limit free competition.



**Do Not Share Confidential Information:** Avoid sharing or exchanging strategic or sensitive information that could lead to the adoption of an anticompetitive practice.

**Report of Unfair Practices:** Having a safe environment to report practices that threaten free competition, ensuring a prompt response to any irregularity.

**Continuous Training:** Promote ongoing training on competition regulations and good business practices.

By adhering to these behaviors, GEB's suppliers and contractors will contribute to a fair and sustainable market, establishing open and clear relationships that prioritize competition on equal terms.

### 8. Personal Data Processing

In the development of relations with GEB, Suppliers and Contractors must comply with GEB's Personal Data Processing Policy and the applicable regulations on the matter.

The main objectives of GEB's Personal Data Processing Policy are to:

- Regulate the collection, storage, use, circulation, deletion, transfer, and transmission of personal data carried out by GEB.
- Ensure that the personal data owners can be aware of, include, update, rectify, delete, and revoke the authorization regarding their personal information that is subject to processing by GEB.
- Establish the guidelines that ensure the protection of personal data that are processed by GEB as the data controller.
- Make sure Suppliers and Contractors fully comply with the processing of personal data.
- Handle the personal data of which it has knowledge with the strictest confidentiality and reserve, only being able to disclose them in the cases strictly indicated by law.
- Report any security incident related to the exposure of personal data held in custody.

GEB's Personal Data Processing Policy is permanently published on GEB's website and can be consulted at the following link: <https://www.grupoenergiabogota.com/conoce-geb/programa-de-etica-y-cumplimiento/proteccion-datos-personales>

The above is notwithstanding the fact that Suppliers and Contractors have internal policies, standards or guidelines that regulate the matter.

Non-compliance with the personal data protection regulations may constitute the offense of Personal Data Violation, which is sanctioned by Colombian criminal legislation.

### 9. Information Management

All information generated within the framework of relations with Suppliers and Contractors is considered a valuable asset, so its protection is of vital importance. Therefore, GEB expects Suppliers and Contractors to take all appropriate measures to safeguard and properly and confidentially handle the information they become aware of in the framework of the relationship with GEB.

By way of example, Suppliers and Contractors are prohibited from:

- Publishing, without prior and express authorization, in whole or in part, information of which they become aware in the context of their relations with GEB.
- Using information of which they become aware in the context of their relations with GEB for their own benefit or that of a third party, to the detriment of GEB.
- Using information of which they become aware in the context of their relations with GEB to engage in unethical, unlawful and/or criminal conduct.

Suppliers and Contractors must refrain from using confidential information for purposes other than those expressly indicated in the respective contracts or agreements with GEB. Likewise, they must maintain confidentiality with respect to negotiation processes, contractual processes, business relations, bidding, and transactions in the securities market, among others.

In case they are required by any domestic or foreign authority in connection with any contract they have with GEB, Suppliers and Contractors must immediately inform the supervisor or auditor of the respective contract, in order to review the requirement made and determine the procedure to be followed, in accordance with GEB's policies, internal regulations and standards of good practice.

In case of outsourcing, Suppliers and Contractors must request GEB's authorization to share or provide information to the respective subcontractor.

Likewise, for all interactions with GEB networks, GEB contractors and suppliers are obliged to have in place mechanisms, software and, in general, all elements for the prevention and protection of GEB information, in accordance with the GEB's Corporate Information Security and Cybersecurity Policy. To this end, they must secure the information repositories, as well as have an information security system with mechanisms to prevent information leakage, unauthorized copying, downloading and, in general, all relevant and appropriate measures to ensure the confidentiality and privacy of the information.

In case of not having their own policies, standards or guidelines for information security, or if these are insufficient in the framework of the relationship with GEB, Suppliers and Contractors must adhere to GEB's Corporate Policy on Information Security and Cybersecurity, which is published on GEB's website and can be consulted at the following link

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

### **10. Sustainability**

GEB seeks the development and building of sustainable companies through competitive businesses in the energy sector that maximize value generation for its stakeholders and contribute to the well-being and prosperity of the communities in the environments where it has influence or operations.

Based on its Sustainability Strategy, GEB established the principles of action that should guide the decisions and conduct of its Suppliers and Contractors:

- Protection of life and integrity.
- Respect for human rights.
- Transparency in the relationship with all its counterparties, including GEB's employees, representatives and/or managers.
- Ethical values and compliance.
- Group action with a long-term vision.

- Building shared prosperity.
- Sustainability planning.
- Operational excellence and environmental performance.
- Timely social and environmental action.
- Rights and obligations.

In view of the foregoing, it is of utmost importance that Suppliers and Contractors ensure respect and the promotion of human rights, protection and care for the environment and the implementation of practices that promote dignified, fair, inclusive, and equitable labor relations.

### **10.1 Human Rights**

Suppliers and Contractors must comply with the applicable laws and regulations, as well as with international standards regarding respect for and promotion of human rights, with special emphasis on, but not limited to, the following commitments:

- Promoting an inclusive work environment where respect prevails, and differences and integrity are valued.
- Ensuring the right to privacy and the good name of its employees.
- Guaranteeing decent working conditions and rejecting forced labor practices, as well as child labor exploitation.
- Recognizing and respecting the individual and collective rights of communities and other stakeholders. Maintain a transparent relationship with local communities.
- Promoting equal treatment and opportunities, regardless of characteristics such as race, sex, gender identity, age, sexual orientation, culture, religion, socioeconomic status, political affinity, appearance, language and accent, disability, health, education, place of origin, work experience, job role and function, lifestyle, thought, personality, among others.
- Rejecting any form of discrimination, violence, or harassment, and establish measures to prevent, address, sanction and eradicate discrimination, violence, and harassment (work-related and/or sexual) in the workplace.
- Prohibiting and punishing reprisals for reporting harassment, threats, intimidation, and verbal, sexual, physical, or psychological abuse.
- Recognizing the individual and social importance of the right of association and collective bargaining and fully complying with the legal provisions aimed at their protection.
- Protecting the safety, well-being, and health of all its employees.
- Promoting the protection of the environment and biodiversity, favoring healthy environments in their areas of influence.
- Advocating to initiate efforts towards the implementation of a human rights policy and due diligence.
- Promoting the respect and adoption of good Human Rights, diversity, equality, and inclusion practices throughout its value chain.

As an integral part of the contractual relationships with GEB, Suppliers and Contractors must sign the Human Rights Policy of GEB.

### **10.2 Labor Standards**

Suppliers and Contractors shall:

- Comply with applicable laws and regulations, both domestic and foreign, in labor, social security and occupational health and safety matters.
- Promote local employment.
- Guarantee a safe working environment.
- Validate the suitability and capacity of its employees to carry out the contracted work activities.
- Take proactive action to prevent occupational safety and health risks.
- Ensure fair and equitable compensation, promoting equal pay for work of equal value.
- Promote employee well-being.
- Ensure a work environment and working conditions that respect applicable legal provisions in terms of minimum wage, working hours, vacations, etc., guaranteeing a balance between the work and personal life of its employees.
- Encourage diversity, equality and inclusion in the company.
- Ensure the freedom of assembly and association of its employees, as well as the right to collective bargaining.
- Promote direct contracting, reducing outsourcing as much as possible, except for activities that by nature, complexity and strategy are necessary.
- Prohibit and penalize any discriminatory practice.

### 10.3 Protection and Care of the Environment

Suppliers and Contractors shall:

- Comply with all applicable laws and regulations, both domestic and foreign, related to protection and care of the environment.
- Take measures to prevent negative impacts on the environment, offset any unavoidable impacts, and manage natural resources responsibly.
- Incorporate initiatives and practices that promote environmental responsibility in the provision of services.
- Raise awareness about the importance of caring for the environment and natural resources in the development of business activities.
- Implement an environmental management system aligned with international standards.
- Train employees on the importance of respecting and caring for the environment at least once a year when the contract duration exceeds 12 months.
- Have systems in place that enable measuring and monitoring the organization's environmental performance.
- Seek to incorporate a sustainable sourcing policy applicable to its suppliers and contractors.

### Reduction of Greenhouse Gas Emissions and Energy Consumption

Advocate for reducing greenhouse gas emissions and promote energy consumption reduction as follows:

- Implement concrete actions to reduce greenhouse gas emissions.
- Promote energy efficiency in all operations.
- Offset the carbon footprint through sustainable projects and measures.
- Promote the use of environmentally friendly materials and the implementation of environmentally friendly practices and technologies.
- Train employees on the importance of reducing emissions.

**Prevention of Pollution and Waste Management**

Commit to responsible practices in pollution prevention and waste management, including:

**Air pollutants:** Monitor and minimize emissions of particles, lead, sulfur dioxide, and other pollutants, complying with local and international regulations.

**Wastewater:** Properly treat wastewater before discharge, ensuring the removal of hazardous contaminants and complying with water quality standards.

**Solid Waste:** Responsible management of all solid waste, both hazardous and non-hazardous, prioritizing waste minimization.

**Measurement:** Monitor and set goals that allow tracking progress on environmental management, including verification by third parties.

**Resource Efficiency**

Implement organizational or technological changes in the design of products and processes to allow for a more efficient use of raw materials and water. This includes:

**Raw Materials Optimization:** Design products and processes that optimize the use of raw materials, reducing waste and promoting reuse and recycling.

**Efficient Use of Water:** Implement technologies and practices that optimize water consumption, minimizing waste and ensuring the sustainability of the water resource.

**Biodiversity Conservation**

Commit to protecting and promoting natural habitats, biodiversity, and sustainable soil management to prevent nutrient loss, erosion, and soil contamination. Considering:

- Whenever possible, avoid conducting operations in locations containing globally or nationally important biodiversity.
- Assess the risks, opportunities, dependencies, and impacts associated with biodiversity.
- To apply the principle of precaution to all planning processes, including prevention, mitigation, and correction activities in all processes that imply environmental risks. This is using the measures included in the mitigation hierarchy as a reference: avoid, minimize, restore, and offset.

**11. Ethics Channel**

Suppliers and Contractors must report through GEB Ethics Channel any violation of this Code of Ethics and Conduct for Suppliers and Contractors, as well as any illegal or unethical act, misconduct, conflicts of interest, ethical dilemmas, malpractice and/or non-compliance with GEB internal policies and standards. Suppliers and Contractors must inform their respective employees and subcontractors about the existence of the Ethics Channel, as well as the obligation to report any potential irregularities.

It is important for Suppliers and Contractors to provide as much information and evidence as possible to facilitate the 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; furthermore, it will be considered a violation of the guidelines stipulated in this Code

of Ethics and Conduct for Suppliers and Contractors and, therefore, as a violation of the respective contract signed with GEB.

The Ethics Channel is confidential, safe, and reliable. An independent expert third party manages the Channel. 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 reprisal resulting from a report or inquiry through the Ethics Channel is prohibited.

When a report or inquiry is made through the Ethics Channel, it is assigned a case number. The Supplier or Contractor making a report or inquiry must establish a password for follow-up or, if necessary, an extension of the report or inquiry. The Corporate Compliance Department reports the result of the preliminary verifications or investigations or the response to the inquiry through the same channel.

### 12. Penalties for Non-compliance

Failure to comply with the provisions contained in this Code of Ethics and Conduct for Suppliers and Contractors gives rise to the implementation of corrective plans by GEB. The repercussions may range from limitations on contracting with GEB for a specified period, up to termination of the respective contract or agreement for breach.

The above is notwithstanding the legal sanctions of a civil, administrative and/or criminal nature that may apply according to the respective violation.

### Definitions

**Shareholders:** A person who owns shares and holds the title representing them, who is also duly registered in the shareholder registry of the respective issuing company (Source: Financial Superintendence)

**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. (Source: Article 22, Law 222/1995)

**Final Beneficiary:** It refers to individuals who ultimately represent the individual or company on whose behalf a transaction is conducted, directly or indirectly. It also includes the individuals exercising effective and/or ultimate control, directly or indirectly, over a legal person or other unincorporated structure and/or those established in the Colombian Tax Law and/or the rules that amend or supplement it.

**Ethics Channel:** Mechanism used to (i) report any violation of this Code of Ethics and Conduct for Suppliers and Contractors, as well as illegal or unethical acts, misconduct, bad practices and/or non-compliance with GEB's internal policies and standards, and (ii) make inquiries and request clarifications on ethical dilemmas.

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

**Employee:** Any natural person linked to GEB by means of an employment or apprenticeship contract, who provides services under subordination and in exchange for remuneration.

**Corruption:** Corruption involves the abuse of positions of power or trust, for personal gain at the expense of the collective interest, carried out through offering or requesting, delivering, or receiving

money or goods in kind, services, or benefits, in exchange for actions, decisions or omissions.  
Source: Transparency for Colombia Chapter Transparency International.

**Fraud:** Any intentional act committed for unlawful gain.

**Terrorist Financing:** It refers to the set of activities aimed at channeling licit or illicit resources, directly or indirectly, to provide, collect, deliver, receive, administer, contribute, safeguard or store funds, goods or resources, or perform any other act that promotes, organizes, supports, maintains, finances or economically sustains organized crime groups, illegal armed groups or their members, national or foreign terrorist groups, national or foreign terrorists, or terrorist activities.

**Financing the Proliferation of Weapons of Mass Destruction:** Any action that provides funds or uses financial services, in whole or in part, for the manufacturing, acquisition, possession, development, export, transfer of material, fractionation, transportation, transfer, deposit or use of nuclear, chemical, or biological weapons, their means of delivery and other related materials.

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

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

**Money Laundering:** It refers to the set of activities aimed at concealing illicit origin or giving the appearance of legality to resources obtained from the execution of illicit or illegal activities.

**Unusual Operations** are transactions whose amounts or characteristics are not related to the ordinary or normal economic activity of the Business Group, which, due to their number, quantity, or characteristics, do not fit within the guidelines of normality or ordinary business practices in a sector, an industry, or with a type of counterparty or stakeholder group, for which these types of operations must be reported in a timely manner. (Source: UIAF).

**Facilitation Payments:** They are payments made to promote routine government actions that are non-discretionary – for example, those that the public official is already obligated to perform. (Source: Foreign Corrupt Practices Act [FCPA])

**PEP:** Politically exposed persons, that is, individuals who perform public functions under any nomenclature and job classification system of the national and/or regional public administration that, by virtue of their position, ; issue rules, regulations, or institutional policies; administer justice or have sanctioning powers; have the function of general management and/or directly manage or administer public goods, money, or securities. This definition also includes senior executives of government entities, high-ranking officials of political parties, the judicial and legislative branches, heads of state and others who have held this position for two (2) or more years after leaving, resigning, or being dismissed from the position and/or those established in the regulations governing the matter. PEPs also include individuals who have a marital, de facto, or legal relationship with publicly exposed persons, as well as their relatives up to the second degree of consanguinity, second of affinity, and first civil. (Source: Decree 830/2021)

**Suppliers:** Individual or legal entities with which GEB may have a legal, commercial and/or business relationship for the provision of services and/or goods and/or products to GEB.

**Bribery:** Any offer, promise, delivery, acceptance, or request of an improper advantage of any value (which may be financial or non-financial in nature), directly or indirectly, and regardless of the location thereof, in violation of applicable law, as an inducement or reward for a person to act or refrain from acting in connection with the of that person's duties (Source: ISO 37001)

**Transnational Bribery:** Whoever gives, promises, or offers to a foreign public official, for the benefit of this official or for a third party, directly or indirectly, money, any pecuniary benefit or other advantage in exchange for the official to perform, omit or delay any act related to the exercise of their duties and in connection with an international business or transaction. (Source: Article 30 of Law 1778)