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I. Board of Directors Commitment

As Board members of Grupo Energía Bogotá, we are convinced that ethics, leveraged on the corporate value of INTEGRITY, is the fundamental pillar of our corporate culture, as it is through ethics and transparency that we build trust with all our stakeholders and ensure the sustainability of the Group and its subsidiaries.

In line with the commitment to maintain ethical behavior, GEB has established this Code of Ethics and Conduct as one of the essential elements of the organization. Through it, we seek behaviors and actions that ensure the development of our operations and our relationships with all our stakeholders in a responsible, legal, ethical, and transparent manner, based on the values of Life Comes First, Empathy, Results-Oriented Approach, Teamwork with Individual Responsibility, and Integrity.

The adoption and implementation of this Code's content will allow us to manage and control the risks of fraud, corruption, and bribery, including, among others, private corruption and transnational bribery, money laundering, terrorist financing, financing of the proliferation of weapons of mass destruction, improper management of personal data, impact on fair competition, and improper conflict of interests' management.

We invite each of the recipients of this Code of Ethics and Conduct to know, internalize, adopt, 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. It is essential that all recipients of the Code are convinced of the responsibility we all have to ensure a transparent company and country.

The Board of Directors ratifies that GEB adopts an unwavering stance of ZERO tolerance towards corruption, fraud, bribery, transnational bribery, or any deviation from the Group's ethical and legal framework. Similarly, it undertakes the permanent commitment to fight against any of these scourges or other illicit activities, contributing to the correct development and functioning of the markets.

We count on everyone to continue making GEB 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 overarching goal 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 President and Senior Management are committed to complying with each of the guidelines and standards included herein, which are classified as mandatory for all Business Group employees. 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 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 one 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 Boards of Directors and employees of the Group and its subsidiaries. It also applies to the relatives of our employees, customers, partners, and/or business allies. 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.

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

Regarding the non-controlled companies in which GEB has equity interest, employees representing it on the Boards of Directors or equivalent corporate bodies shall disclose, present, and propose the best practices of anti-corruption and anti-bribery corporate ethics, so that these may be assessed and considered for adoption by the relevant bodies.

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 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 regarding beliefs, race, ideologies and other factors, so that we can elevate our humanity every day.

In addition, in fulfilling the duties of their positions, all managers and employees of GEB and its subsidiaries must act according to the following ethical principles:

Transparency: Refers to how we conduct our management objectively, clearly, and reliably.

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 conducting business activities in good faith and in compliance with applicable laws, rules, and regulations.

Responsibility: 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. These responsibilities 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 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, transnational 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.

Reporting any inquiry, ethical dilemma and/or complaint to the ethics channel in good faith and in a timely manner.

Certifying, when required, the knowledge, commitment and adoption of the guidelines included in this code.

Conducting all operations, processes and procedures of the Group and its subsidiaries in an integral, legal, ethical and transparent manner.

Managing the risks and controls associated with the processes carried out within the Internal Control system, ensuring the effectiveness of said management.

Actively participating in all programs for the dissemination, communication, and training on the initiatives of the Corporate Compliance Department, focused on ensuring our ethical culture.

In a timely manner and with the required quality, providing 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 and will not take any reprisals against those who report potential violations of the Code of Ethics and Conduct.

VII. Guidelines for Complying with Applicable Laws and Internal Regulations

Grupo Energía Bogotá is committed to full compliance with all laws currently in force and applicable in the countries where it operates, regarding the prevention and mitigation of the risks identified in the Ethics and Compliance Program.

GEB is primarily concerned with regulatory provisions on the prevention and management of fraud, corruption, bribery, transnational bribery, money laundering, terrorist financing and financing the proliferation of weapons of mass destruction, information management, free competition, management of conflicts of interest, the 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 including transnational bribery. In this regard it is forbidden to give, offer, grant, promise, insinuate, accept and/or request any improper advantage of any value, be it in cash or in kind, either directly or indirectly, to any third parties, including suppliers, contractors, and Public Officials, both domestic and foreign. This includes giving benefits, sponsorships, or favors through which criminal activities are concealed.

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 developing its business activities.

b. Conflicts of Interest

Employees, executives, and members of the Board of Directors of GEB and its subsidiaries are in a conflict of interest when their independent and objective judgment is limited in carrying out their responsibilities by having to choose between GEB's interest and their own, or that of a third party, or a related party.

Employees, directors, and board members must act objectively, transparently and impartially in the performing their duties, which means 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:

One is facing a personal conflict of interest when our objectivity and independence in making corporate decisions is distorted by the existence of relationships with individuals other than those with whom we have consanguinity, affinity, or civil links, or when such relationships become public or notorious and affect the good work environment that should be observed within a workplace.

These situations may arise, including but not limited to, with the following individuals: former colleagues, classmates, childhood friends, godparents of marriage or children, sentimental and/or romantic partners, boyfriends/girlfriends, or permanent partners, given that becoming spouses or permanent partners creates a family conflict of interest.

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 adoptive 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 may have a connection as a manager, shareholder, or other, accepting to be an external advisor to a company that has links with GEB, or that may imply competition with GEB.

In any case, employees must immediately inform their direct supervisor and the Corporate Compliance Department of any real or potential situation of conflict of interest in which they are or may become involved. The inquiry should be raised through the Ethics Channel, through any of its reporting mechanisms. The Corporate Compliance Department will analyze each situation on a case-by-case basis and issue the corresponding recommendations for mitigation.

In the case of romantic relationships within the company, these must be reported promptly and immediately, in order to assess the risk of materialization of a conflict of interest and define the controls to be applied. In any case, romantic relationships cannot occur between subordinates and superiors, nor when they could be used to conceal or omit errors or information from either party, or to create favoritism or retaliation against one party when the relationship ends. It is essential that any romantic relationship between colleagues ensures a healthy work environment, respect, and the professional conduct of every individual.

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 Group company.

Furthermore, it is of vital importance to highlight that all recipients of this Code are obliged to maintain a duty of loyalty towards the organization and its managers. 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 intended, e.g., real estate, equipment, vehicles, offices, (ii) diversion of business that should reach the GEB as an actor in the pursuit of business or its exploitation, (iii) the misuse of information for personal benefit or that of a third party, (iv) establishing employment or commercial relationships with third parties that have or may come to have a relationship with the GEB, 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/en/corporate-governance/corporate-policies/company-policies>

Given the dynamics in interpersonal relationships, it is impossible to determine all situations that may generate conflicts of interest; however, below we present the following non-exhaustive examples that may constitute conflicts of interest, in which employees who find themselves in any of them must refrain from acting or deciding and immediately inform their direct supervisor and the Corporate Compliance Department:

Type of conflict	Example
Personal conflict of interest	I have been appointed as an evaluator in a selection process in which the company I worked for six months ago submitted a bid.
	I started a romantic relationship with a colleague.
	I was appointed as administrator of an agreement in which the registered agent of the contractor is the godfather of my son.
Family conflict of interest	Within my duties, I must receive reports and deliveries from a contractor firm where my son-in-law started working.
	My half-brother, with whom I do not have a close relationship, works for the contractor company that I must oversee.
	I have been assigned the task of leading a project that is being developed jointly with other subsidiaries. My adoptive father will be part of the team.
Economic conflict of interest	I teach classes on Saturdays at a university. I have been appointed as the administrator of a contract with said institution.
	I am part of the contracting committee where I must decide on the assignment of an agreement in a selection process in which a company in which I own shares is participating.
	I am a member of a Board of Directors in a non-profit organization to which GEB has just requested affiliation, and as a member of said organization, I am part of the committee that decides on said request.

i. Guidelines on Gifts and Gratuities

Corruption and bribery are not limited to money. Therefore, GEB managers 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 on Gifts and Hospitality, which is available on GEB’s website:

<https://www.grupoenergiabogota.com/en/geb-group/ethics-and-compliance-program>

<https://www.grupoenergiabogota.com/en/corporate-governance/corporate-policies/company-policies>

c. Guidelines on Donations, Sponsorships, and Political Contributions

As a general rule, donations are prohibited in GEB and are only made in the framework of social and shared value programs, and/or in the case of natural disasters or humanitarian emergencies, relief may be granted, in accordance with the monetary limits provided for in accordance with the statutory powers of the President of the Company. If the relief exceeds such limits, prior approval of the Board of Directors must be obtained. In any case, it must be documented and accounted for in accordance with the applicable internal rules and corresponding accounting provisions.

Sponsorships can only aim to support the positioning of GEB brands and must be endorsed by the communications area, upon receipt of the request by the interested area with the justification of the need to sponsor or be present at an event, in accordance with the corporate strategy.

Under no circumstances shall sponsorships or donations in money or money equivalents be granted, including but not limited to: checks, loans, vouchers or gift cards, or any benefit that can be redeemed for cash, nor shall donations be made that do not comply with the provisions of Article 355 of the Political Constitution of Colombia. It is essential that all employees of the Group and its subsidiaries ensure that the resources allocated for social investment are aligned with the Company's activities and strategic objectives.

Similarly, it is prohibited to make, on behalf and representing GEB, any kind of political contribution, in cash or in kind, to any movement, party, significant groups of national or foreign citizens, as well as Politically Exposed Persons (PEP), or to carry out any kind of political proselytism in the GEB facilities.

d. Relations with Public Officials

The Foreign Corrupt Practices Act (FCPA) establishes that it is illegal to pay, offer, promise, or authorize cash or anything of value (hospitality, donations, entertainment, among others), directly or indirectly, to any foreign public official, in order to influence their decisions and obtain an advantage or business in return. For this reason, GEB employees should not make payments to public officials, political parties, or candidates.

GEB and its subsidiaries maintain relationships with officials based on legality, ethics, cooperation, and transparency. Consequently, employees who, due to their responsibilities within the activities of the Group, have any kind of relationship with national or foreign public officials, must act professionally and in compliance with current applicable law and in observance of corporate values.

For this purpose, GEB has defined guidelines for proper relations with public officials, which must be strictly complied with. Within these, payments for lobbying expenses and lobbying through intermediaries are prohibited, as well as any act of corruption or bribery or any activity that may affect the Group's reputation.

Furthermore, within the framework of the FCPA, the integrity of GEB's accounting and its subsidiaries must be ensured, in order to avoid recording undue payments through accounting mechanisms that create a sense of legality.

e. Prevention of Money Laundering, Terrorist Financing and Financing the Proliferation of Weapons of Mass Destruction(ML/TF/FPWMD)

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 a zero-tolerance policy against ML/TF and defines prevention mechanisms against these scourges and associated risks such as contagion risk, legal risk, operating risk, and reputational risk.

Therefore, in performing their functions and specific duties, management and employees of GEB and its subsidiaries must implement the controls established by GEB for the management of risks associated with money laundering, terrorist financing, and the financing of the proliferation of weapons of mass destruction, including the proper management of internal procedures for knowledge

of stakeholders and due diligence mechanisms, through which, as a minimum, the binding and/or sanctions lists for Colombia and the countries where GEB operates are verified.

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.

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

- Stakeholders or counterparties on which the competent authorities make information requirements.
- Unjustified increase in wealth.
- 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.
- Relationships with sanctioned countries and/or counterparties.
- Refusal to provide the requested information, among others.

Accordingly, employees must be aware, understand, and fully comply with GEB's Manual for the Prevention of Money Laundering, Terrorist Financing, and Proliferation of Weapons of Mass Destruction Proliferation (ML/TF/FPWMD), as well as the procedures, guidelines, and frameworks established in this regard.

<https://www.grupoenergiabogota.com/en/geb-group/ethics-and-compliance-program/prevention-of-money-laundering-and-terrorist-financing>

f. Contractual Procedures

GEB promotes integrity and transparency in the markets in which it operates and requires all its managers and employees to subscribe to the commitment to integrity, comply with the laws, standards, and regulations applicable in contractual procedures. 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.

All of the above must be guaranteed through the implementation of the Sourcing Policy, which is published at the following link:

<https://www.grupoenergiabogota.com/en/corporate-governance/corporate-policies/company-policies>

g. Internal Accounting

GEB handles its accounting in a reliable and reasonable manner, through an Internal Control system that ensures the development of processes and procedures that are detailed and accurate to handle transactions and assets. Furthermore, GEB safeguards the supporting documents of the accounting records, following clear guidelines on information safety and access. It is therefore essential that access to the company's information and assets be limited to authorized personnel.

All employees must ensure the effectiveness of the controls under their responsibility and follow the internal procedures established by GEB for these purposes in order to record their proper management. Any accounting or financial information that is or should be reported, internally or externally, must meet the criteria of accuracy, precision, timeliness, and completeness.

As employees and managers, we have the responsibility to manage the risks and controls to achieve the organization's strategic objectives; failure to self-monitor, self-manage, and self-regulate our processes creates weaknesses.

h. Information Management

All information generated during the development of GEB 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, guarantee their access, and properly manage the information they become aware of during performance of their responsibilities and duties.

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 misuse of privileged and/or confidential information is subject to criminal legal sanctions.

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. The Corporate Compliance Department is the only area trained and specialized to carry out the monitoring and forensic control of technological assets.

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.

i. 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 ensures the appropriate use and protection of the personal data processed by GEB as the party responsible for processing personal data.

A fundamental pillar of GEB's Personal Data Protection Program is the 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

Employees must be aware, understand, and fully comply with the guidelines set forth in the Personal Data Protection Program of GEB, especially as set out in the Personal Data Processing Policy, which is available at:

<https://www.grupoenergiabogota.com/en/geb-group/ethics-and-compliance-program/personal-data-protection>

j. Anticompetitive Practices

GEB promotes the interests of the market in which it conducts its activities and is committed to promoting and adopting behaviors and practices that ensure the development of operations and relationships with all its stakeholders in a responsible, legal, ethical, and transparent manner. Therefore, any practice that restricts or undermines free competition or affects consumer well-being is rejected, promoting healthy and fair competition in the market.

VIII. Sustainability

GEB has a Sustainability Policy, through which the framework is defined to ensure the sustainability of GEB's projects, investments, and operations, creating conditions of well-being and prosperity in the territories. GEB strives for sustainable management of its businesses and activities, aimed at the creation of social, economic, and environmental value, establishing the basis for high business performance and corporate decision making.

In compliance with current regulations, including Law 2111 of 2021, which criminalizes offenses against natural resources, the environment, and climate change, Grupo Energía Bogotá acknowledges the importance of protecting natural resources and the environment. It is essential for the company to act in accordance with the law out of conviction and commitment.

Grupo Energía Bogotá is against ecocide, a term recognized by the international community and encompassing "any illicit or arbitrary act committed knowingly that there are significant probabilities that it will cause serious extensive or lasting damage to the environment."

GEB's Sustainability strategy seeks to carry out business activities based on relationships with stakeholders based on transparency and trust, always within the legal framework.

The following are the main commitments of GEB regarding sustainability, 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 line with the commitment to international standards such as the UN Guiding Principles on Business and Human Rights, the fundamental conventions of the International Labor Organization, and the ten principles of the United Nations Global Compact, GEB promotes compliance with the following guidelines during the development of its business activities:

a. Respect for Human Rights

GEB complies with the laws and regulations applicable in each jurisdiction in which it operates, as well as with national and international standards regarding respect for and promotion of Human Rights. For this, mechanisms for due diligence of Human Rights have been defined, in order to ensure and mitigate the impacts of its operations.

Therefore, all employees of GEB and its subsidiaries must act with social responsibility and respect for human rights in all its interactions with stakeholders, 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 compliance with applicable laws and regulations in each jurisdiction in which it operates, in labor, occupational health, and industrial safety matters, ensures fair and equitable compensation, and provides guarantees for a safe and secure work environment.

It also allows the freedom of assembly and association of employees, as well as the right to collective bargaining and adopts proactive measures to prevent health and safety risks in the workplace.

When subscribing to and managing the labor agreements that formalize hierarchical relationships, the company is committed to ensuring that authority is exercised fairly and correctly, avoiding any type of abuse and promoting a healthy work environment.

Similarly, GEB promotes and encourages equality, diversity, and inclusion in all its activities and interactions.

c. Protection and Care for 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.
- Adopt responsible practices for the rational use of natural resources in operational, administrative facilities, and teleworking.
- Comply with the environmental policy.

- Measure, monitor, and manage the environmental performance in all activities related to its functions.
- Protect all forms of life, reject animal abuse, and illegal wildlife trafficking.
- Adoption of proactive measures for pollution prevention and waste reduction.
- Promote sustainable commuting alternatives to reduce greenhouse gas emissions in all types of travel.
- Learn about 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.

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, as well as between individuals of any hierarchical level. The following is a non-exhaustive list of examples of sexual harassment:

- 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.
- Requesting dates or sexual encounters with a person.
- 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.

X. Ethics Channel and Whistleblower Protection

Employees of GEB and its subsidiaries are obligated to report, through the Ethics Channel, any violation of this Code of Ethics and Conduct, as well as any illegal or unethical act, misconduct, violation of Human Rights, malpractices, and/or non-compliance with GEB's internal policies and regulations.

It is important for employees to provide as much information and evidence as possible to facilitate the internal validation and verification process. The submission of reports or the provision of deliberately false, misleading, or unfounded information will not be subject to follow-up or review by GEB and may result in disciplinary sanctions in accordance with the current law applicable in each country and in the respective Internal Work Regulations of each GEB company.

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

Within GEB, mechanisms are established to protect those employees, contractors, suppliers, or any stakeholder who, in good faith, report actions contrary to ethics, legality, transparency, and, in general, our corporate value of Integrity, as well as those who raise inquiries on dilemmas through the channels provided by the company for this purpose. For this, GEB has documents such as the Whistleblower Protection Guide, in which various protective measures are implemented for whistleblowers in good faith, such as labor, legal, psychological protection, among others, promoting the confidentiality and anonymity of the reports.

When filing a report or inquiry through the Channel, a record number will be assigned to the reporter or inquirer, which they can use for the follow-up or expansion of their 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.

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: 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).

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

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.

Senior Management: refers as a whole to the directors, President, Vice Presidents, and Department Heads of GEB and its subsidiaries.

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.

Employees: Individuals bound to GEB through a work or learning contract that provide services under supervision and in exchange for compensation. Includes the managers.

Stakeholders / 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) Customers; (vi) Partners.

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

Controls: Activities through which the Board of Directors, management, or other staff oversee and carry out, to mitigate the risks that prevent the company's objectives from being met.

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: Transparencia por Colombia).

Due Diligence: Due diligence consists of performing the necessary actions to adequately get to know the Counterparties or stakeholders with which Grupo Energía Bogotá maintains commercial relations, reinforcing the knowledge of counterparties that, due to their activity or condition, are sensitive to money laundering, terrorist financing or financing the proliferation of weapons of mass destruction, and, in general, complying with each and every one of the obligations established in the Law and this Manual, the Code of Ethics and Conduct and provisions issued by Grupo Energía Bogotá. (Source: Corporate Compliance Department).

Terrorist Financing: It refers to the set of activities aimed at channeling illicit resources, directly or indirectly, to provide, collect, deliver, receive, manage, contribute, safeguard, or store funds, goods, or resources. To perform any other act that promotes, organizes, supports, maintains, finances, or economically sustains organized crime groups, armed groups operating outside the law 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.

Public Official: Any person holding a legislative, administrative, or judicial position, whether by appointment, election, or succession, or any candidate for a public office. (Source: ISO37001).

FCPA: Foreign Corrupt Practices Act of the United States "US Foreign Corrupt Practices Act" (Source: FCPA Law).

Fraud: Any intentional act committed for unlawful gain.

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

Significant Groups of Citizens: Significant groups of citizens do not imply a permanent organization but the mere circumstance of presenting lists and candidates in a specific electoral event. They maintain the right to submit lists of candidates to replace the mayors and governors elected in cases where the Law permits it. It differs from a social movement in that a significant group of citizens can only be made up of individuals. (Source: National Electoral Council).

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: These are operations whose amount 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: The term given to an illegal or unofficial payment made in exchange for services that the payer is legally authorized to receive without making such payment. It is usually a relatively small payment made to a public official or a person with a certification function in order to ensure or expedite the progress of a procedure or necessary action, such as issuing a visa, work permit, customs clearance, or phone installation. It is clarified that such payments are expressly prohibited. (Source: ISO 37001).

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

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.

Suppliers: Individual or legal entities 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.

Internal Control System: Process carried out by the Board of Directors, Senior Management, and other staff of the organization to provide reasonable assurance regarding the achievement of business objectives.

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 performance of that person's duties. (Source: ISO 37001).

Transnational bribery: A conduct consisting of giving, offering, or promising a foreign public official, directly or indirectly: (i) sums of money; (ii) objects of pecuniary value; and/or (iii) any benefit or advantage, in exchange for that foreign Public Official performing, omitting, or delaying any act related to his or her functions and in connection with an international business or transaction. (Source: Article 30 of Law 1778).