

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

TO WHOM IT MAY CONCERN

At GEB, we are committed to the highest standards of conduct and corporate compliance. To this end, we have established an Ethics and Compliance Program designed to safeguard the integrity of the organization, provide reasonable assurance regarding its financial statements, and support the compliance of established objectives. This is achieved through a culture rooted in ethical behavior, transparency, and adherence to the regulatory framework, fostering trust and security among our employees and all stakeholder groups with whom our organization interacts.

Senior Management actively promotes a culture dedicated to combating money laundering, terrorism financing, the financing of the proliferation of weapons of mass destruction (ML/TF/FPWMD), fraud, bribery, corruption and conflicts of interest, and protects personal data as well as fair competition. This is ensured through strict adherence to governing regulations and best practices in mitigating these risks.

Through our Ethics and Compliance Program, we aim to ensure that process leaders understand the compliance risks they must manage while also raising awareness among all GEB stakeholders of their roles and responsibilities in preventing improper actions or situations that could undermine transparency as the foundation of all interactions and management.

Our Ethics and Compliance Program is structured around three core pillars: (i) Prevention, (ii) Detection, and (iii) Response. These elements are embedded within a strong corporate culture embraced by all GEB employees, based on the Code of Ethics and Conduct and underpinned by the corporate value of integrity. Furthermore, our Program is built on the identification of compliance risks, including fraud, corruption, bribery, money laundering, terrorism financing, the financing of the proliferation of weapons of mass destruction, violations of free competition, breaches of personal data protection, and conflicts of interest.

Below, we outline the key documents that establish the guidelines on ethics and compliance, intended for all our stakeholders:

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

These and other corporate documents on ethics and compliance are accessible at our website: <https://www.grupoenergiabogota.com/gobierno-corporativo/politicas-corporativas> and <https://www.grupoenergiabogota.com/conoce-geb/programa-de-etica-y-cumplimiento>.

Below are the most relevant aspects of our Ethics and Compliance Program:

1. **Compliance Report Presentation:** Biannually, the Corporate Compliance Director presents a report to the company's Board of Directors, detailing the management and development of the various activities incorporated into the organization's Ethics and Compliance Program.
2. **Training Sessions and Communications for Employees and Stakeholders on Matters related to the Ethics and Compliance Program:** Our organization implements an annual communications and training sessions program targeted at our employees, Senior Management, Board members, administrators, suppliers, contractors, and customers. This program aims to support the ethical culture of GEB and its subsidiaries and provides the necessary tools for understanding compliance risks and the controls needed to prevent its materialization. It also fosters behaviors rooted in integrity and other corporate values, encouraging exemplary conduct throughout the organization.
3. **Internal Control:** The Internal Control System is built on the principles of self-control and self-management, understood as each employee's capacity, as well as their ongoing exercise, to manage risks and ensure control effectiveness, thereby facilitating the achievement of both individual and organizational goals.

4. Risk Management: In line with the organization's Risk Management Policy, the company establishes a framework for comprehensive risk management, including the assessment of risk appetite, capacity, and tolerance.
5. Due Diligence and Enhanced Due Diligence Procedures: Our organization has implemented both standard and enhanced due diligence processes to identify potential alerts regarding its stakeholders and ensure compliance with regulatory guidelines.
6. Monitoring and Corrective Actions: The Ethics and Compliance Program operates under the premise that any ethical misconduct or deviation from the ethical framework that cannot be effectively prevented must be detected and remediated through timely and effective responses, applying the corresponding corrective measures.
7. Biannual Verification by the Statutory Auditor: The organization's Statutory Auditor verifies compliance with the controls established in both internal and external regulations to prevent ML/TF/FPWMD and provides an opinion on the financial statements. To date, there have been no adverse findings in this regard.
8. Whistle-Blowing Channel: Our organization maintains an Ethics Channel, managed by an independent third party, which allows for the submission of reports and ethical dilemmas, handled by the Corporate Compliance Department. Additionally, GEB provides a Whistleblower Protection Guide. We offer our stakeholders access to the Ethics Channel on our website: <https://www.grupoenergiabogota.com/#Canal-Etico>
9. Personal Data Protection: Our organization also operates a Personal Data Protection Program to ensure compliance with the Colombian Personal Data Protection Regime. The Program is accessible at the following link: <https://www.grupoenergiabogota.com/conoce-geb/programa-de-etica-y-cumplimiento/proteccion-datos>
10. Anti-Bribery Management System Certification: Our organization complies with the requirements set forth in the international standard ISO 37001:2016, whose scope includes the management of bribery risks in the activities of identification, evaluation, consolidation, and follow-up of investments in the energy sector.
11. Engagement with the Fiscal Control Entity: GEB, as a company whose whose majority shareholding is owned by the District, is subject to fiscal oversight by the Bogotá Comptroller's Office.

Accordingly, I certify that our organization complies with the applicable internal and external regulations regarding the components of the Ethics and Compliance Program, in accordance with the prevailing legal framework governing GEB's legal nature.

The Ethics and Compliance Program is supervised by the Board of Directors. The Corporate Compliance Department ensures the effective, efficient, and timely operation of the Ethics and Compliance Program. It functions as an independent unit that reports directly to the Board of Directors' Audit and Risk Committee, to which it submits periodic reports on the program's status.

Sincerely,

[ORIGINAL SIGNED]

LUZ ELENA DÍAZ GARCÍA
Corporate Compliance Director
2025 Period