

# Human Rights Due Diligence System



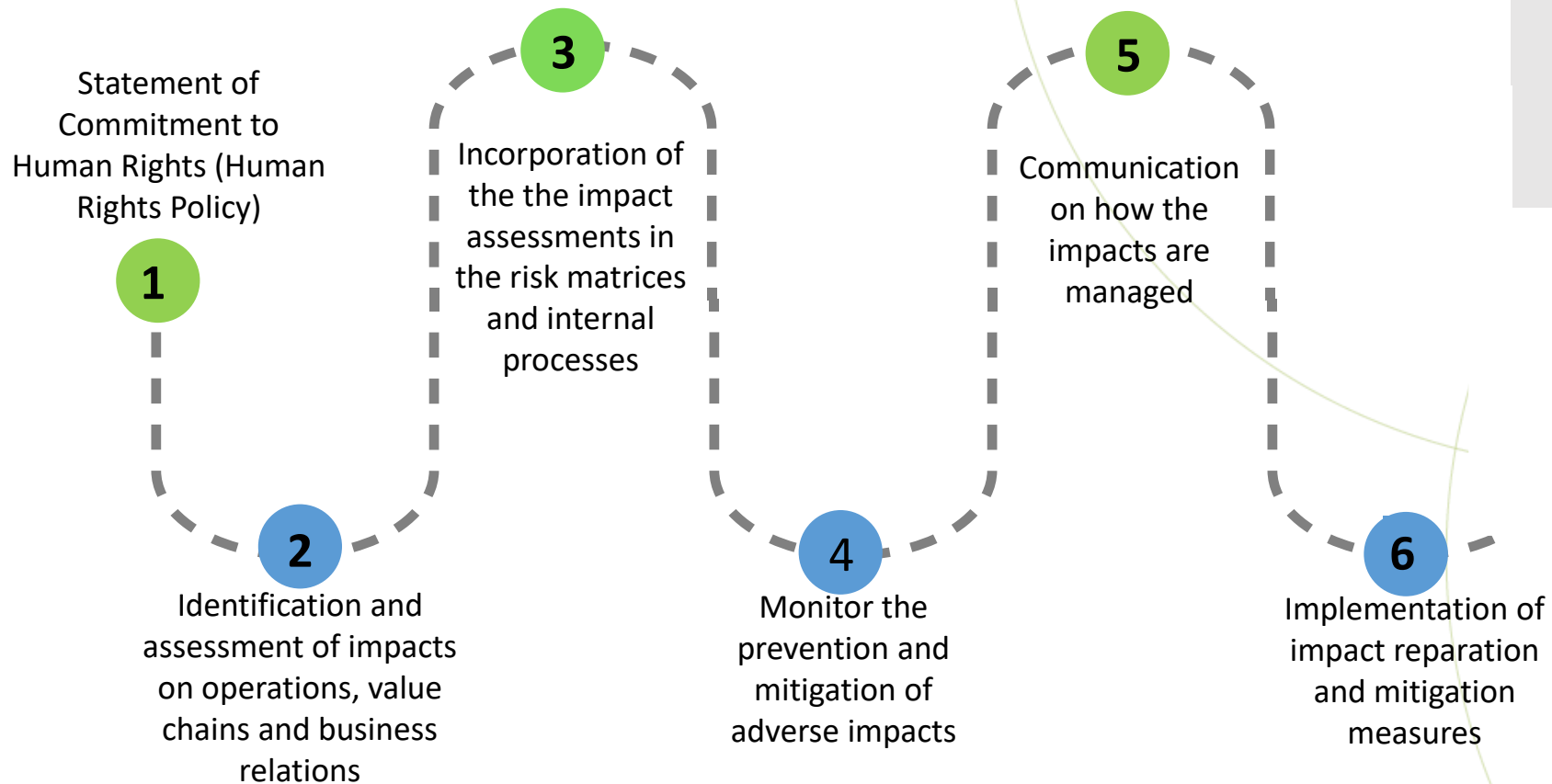
Grupo  
Energía  
Bogotá

*Better lives with  
sustainable and  
competitive  
energy*



# Stages of Human Rights Due Diligence at GEB

GEB's due diligence covers the following stakeholder groups: women, children, indigenous peoples, contractors and local communities.

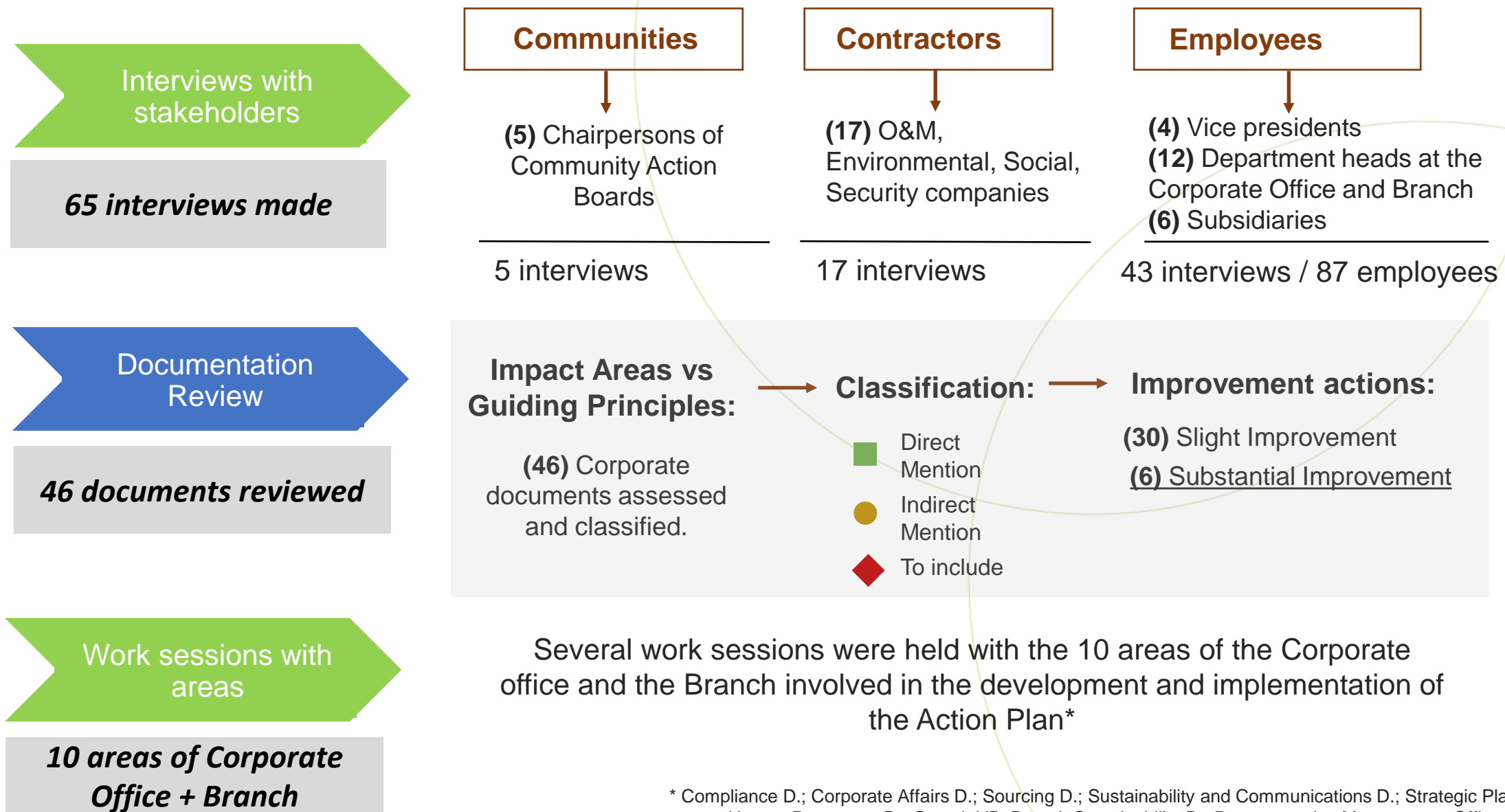


## Due Diligence Scope

**GEB** (Corporate and Transmission Branch)



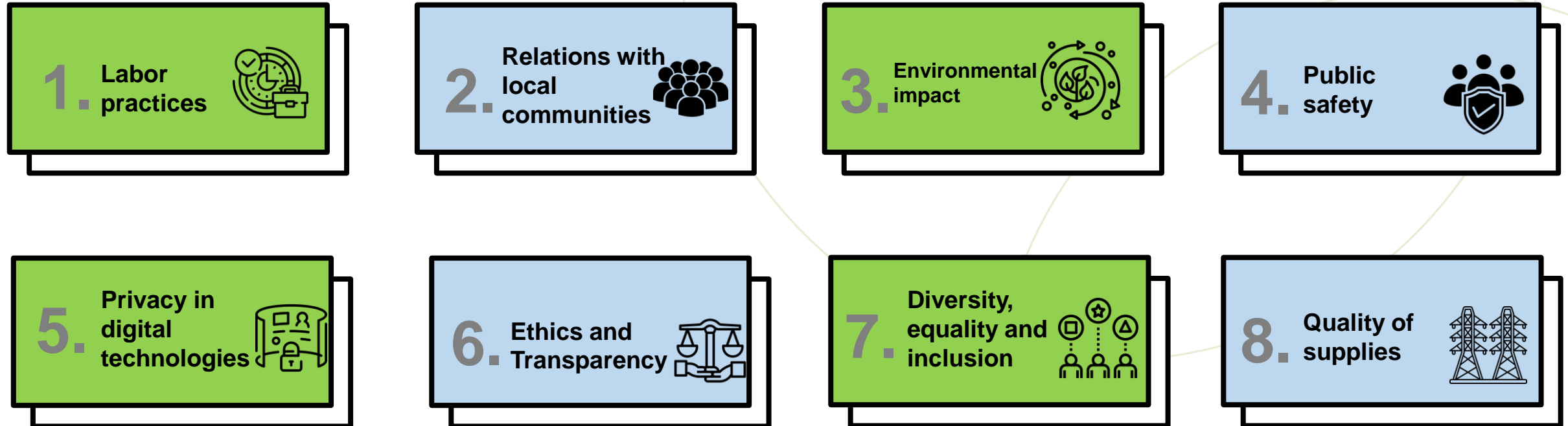
# Internal information sources used by the due diligence system



\* Compliance D.; Corporate Affairs D.; Sourcing D.; Sustainability and Communications D.; Strategic Planning D.; Human Resources D.; Growth VP; Branch Sustainability D.; Documentation Management Office; Security.

# Areas of potential Human Rights impact

The identification of areas of impact took into consideration: the region (Latin America), the country (Colombia), and the sector (energy), as well as GEB's organizational diagnosis.



# Areas of potential Human Rights impact

## 1. Labor practices



*GEB Areas Involved: Human Resources Department, Sourcing, Insurance*

### Typologies:

- a) Trade union rights (to organize and to collective bargaining)
- b) Work conditions
- c) Occupational Safety and Health
- d) Equality and diversity (equal remuneration)
- e) Child and forced labor

### Main Human Rights Affected

Workplace and union rights; work under fair and favorable conditions; social protection and adequate standards of living and the right to enjoy the highest level possible of physical and mental health, and the right to equality and non-discrimination. Children's rights. Freedom and safety.

## 2. Relations with local communities



*GEB Areas Involved: Branch Sustainability and Sourcing Departments*

### Typologies:

- a) Land rights and access to natural resources
- b) Other social or cultural impacts
- c) Other impacts on health and safety

### Main Human Rights Affected

Food, housing and health. Indigenous peoples' rights.

## 3. Environmental impact



*GEB Areas Involved: Sustainability and Sourcing Departments*

### Typologies:

- a) Climate Change
- b) Other large-scale environmental impacts

### Main Human Rights Affected

Life, food, housing and health. On nature and sustainable development. Indigenous peoples' rights

# Areas of potential Human Rights impact

**4. Public safety**




**Definition:**  
Violence and serious intimidation of members of local communities, union leaders, human rights or environmental activists, union members, etc.

**Main Human Rights Affected**  
Life, freedom and safety. To not be subject to torture or cruel or inhuman treatment.

*GEB Areas Involved:  
Services and Infrastructure  
Office, Sourcing*

**5. Privacy in digital technologies**



**Definition:**  
Problems derived from the supervision of communications, and gathering, storage and processing of the personal data of employees and third parties.

*GEB Areas Involved:  
Compliance Department*

**6. Ethics and Transparency**



**Typologies:**  
a) Corruption and bribery  
b) Corporate fiscal policy  
c) Competition

**Main Human Rights Affected**  
Equality and non-discrimination, access to basic services of high quality, and the most vulnerable collective rights.

*GEB Areas Involved: Compliance Department,  
Documentation Management Office*

# Areas of potential Human Rights impact

**7. Diversity, equality and inclusion**



*GEB Areas Involved: Compliance Department, Documentation Management Office*

## Typologies:

- a). Corruption and bribery
- b). Corporate fiscal policy
- c). Competition

## Main Human Rights Affected

Equality and non-discrimination, access to basic services of high quality, and the most vulnerable collective rights.

**8. Quality of supplies**



*GEB Areas Involved: Human Resources Department, Sustainability and Communications Departments, Sourcing*

## Typologies:

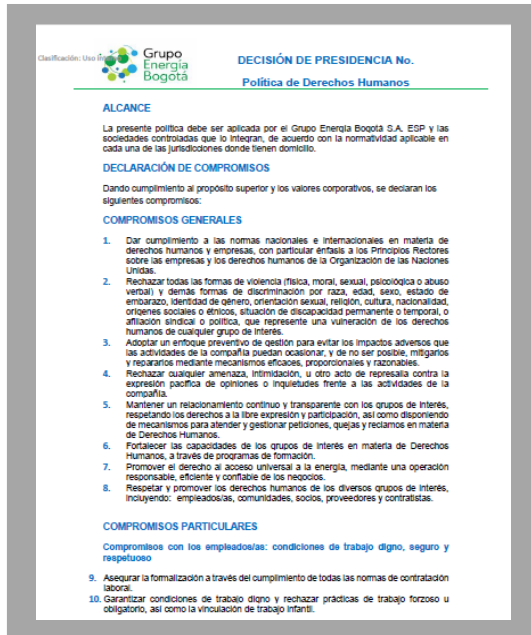
- a) Stereotypes
- b) Invisible barriers
- c) Discrimination
- d) Workplace violence and harassment
- e) Sexual harassment

## Main Human Rights Affected

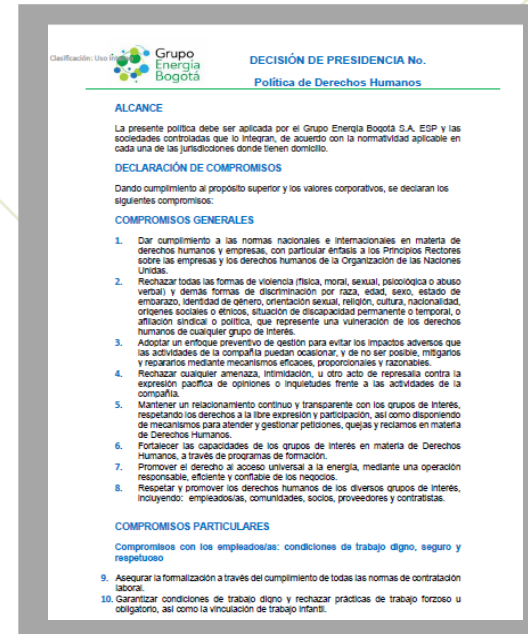
Equality and non-discrimination, labor practices, access to basic services of high quality, and the most vulnerable collective rights.

# Human Rights Manuals

## Human Rights Due Diligence Manual for Subsidiaries



## Methodological Manual for the assessment of Human Rights Impacts for the Corporate Office and the Subsidiaries





# Human Rights Mitigation Plans

The following are several of the most noteworthy processes undertaken by GEB that involve the development of mitigation strategies:

- **Communities:** GEB's guidelines for intercultural relations necessitate a due diligence process, encompassing an assessment of actual and potential human rights impacts and the formulation of management measures, including guidelines on managing any possible negative consequences at different project stages.
- **Suppliers and Contractors:** Regular evaluations focus on HSE, environmental management, and social responsibility. If an unfavorable assessment is made, improvement actions must be submitted to GEB. Additionally, the HSSE Manual mandates that contractors must anticipate and manage possible social conflicts between stakeholders and GEB, within a framework of respect for human rights. GEB provides periodic training to suppliers and contractors on Human Rights and diversity, equality and inclusion, and the contracts signed by GEB and its subsidiaries include termination clauses in the event of Human Rights violations by a contractor. For additional information, please refer to the HSSE Manual: [https://www.grupoenergiabogota.com/en/content/download/33835/file/Manual%20HSSE\\_En.pdf](https://www.grupoenergiabogota.com/en/content/download/33835/file/Manual%20HSSE_En.pdf)
- **Employees:** GEB operates a Diversity, Equality, and Inclusion (DEI) Committee tasked with ensuring compliance to the Human Rights Policy and the HR and DEI strategy. The Committee approves and monitors prevention and mitigation plans pertaining to HR and DEI, which include training and awareness-raising for employees, tools to ensure impartiality and non-discrimination in personnel selection, implementation of the “Equipares” gender equality management system, etc.: <https://www.grupoenergiabogota.com/en/sustainability/social-performance/human-rights>. Additionally, GEB’s Employee Relations Committee receives and manages workplace harassment complaints, applying the established procedure for these effects: <https://www.grupoenergiabogota.com/conoce-geb/talento-geb/comite-de-convivencia>



# Human Rights Risk Management



**Approval of the inclusion of the risk of human rights violations** in the Group's strategic risks matrix (*October 2022*)



**Bi-monthly monitoring** of risk with those responsible for risk controls

**Risk 20:** Violation of human rights by GEB, or by a GEB employee, partner or contractor





# Grupo Energía Bogotá



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