



# Human Rights DUE DILIGENCE SYSTEM

## Business Group

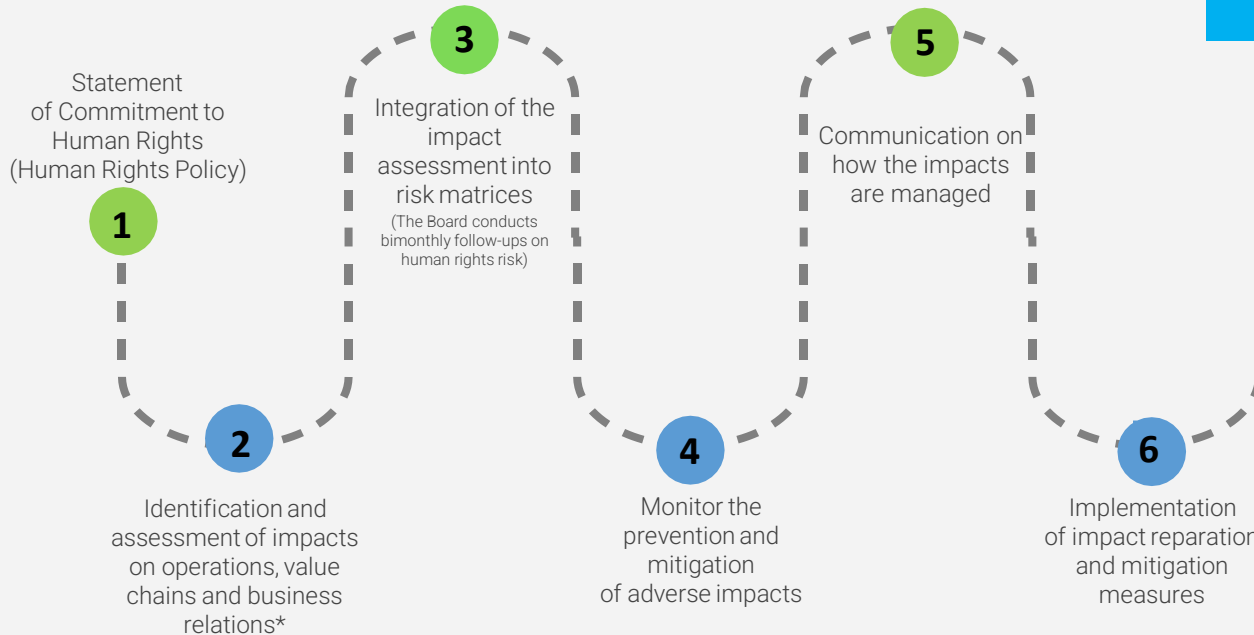
# Human Rights Strategy Group

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# Human Rights Due Diligence Phases Group

GEB's due diligence process covers the following stakeholders: our own employees, women, children, indigenous populations, contractors (including third-party employees), and local communities



## Due Diligence Scope at the Group:

### Colombia:

- GEB Corporate
  - Enlaza
- Transportadora de Gas Natural Internacional (TGI)

### Peru:

- Cálidda
- Contugas
- Electrodonas

### Guatemala

- Conecta

\*Although no new business relationships were established in 2023, the process for identifying human rights impacts remains consistent with that used for the company's own operations and its value chain.

# Internal information sources used by the Group's Due Diligence System include:

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## Interviews with Stakeholders

- Communities
- Contractors
- Group Workforce

## Documentation Review

- Policies
- Strategies
- Procedures

## Working sessions with relevant areas

- Departments: Compliance, Corporate Affairs, Procurement, Strategic Planning, Talent Management, Vice Presidency Areas of Growth, Document Management, Security, Sustainability, and Communications.

# Areas of potential human rights impact with Group scope

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The identification of impact areas considered the region (Latin America), the countries where subsidiaries operate (Colombia, Peru, and Guatemala), and the sector (energy and gas).

01

Labor practices

02

Relationships with local communities

03

Environmental impact

04

Public safety

05

Privacy in digital technologies

06

Ethics and Transparency

07

Diversity, Equality and Inclusion

08

Quality of Supply

# Areas of potential impact on Human Rights Business Group

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01

Labor practices

## 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:

Labor and union rights (freedom of association and collective bargaining); the right to work under just and favorable conditions; to social protection, an adequate standard of living, and the enjoyment of the highest possible level of physical and mental health; to equality (equal remuneration) and non-discrimination. Children's rights. Freedom and safety.

02

Community Relations local

## 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.

03

Environmental impact

## 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 impact on Human Rights Business Group

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04

Public safety

## Typologies:

Severe violence and intimidation of members of local communities, social leaders, human rights or environmental activists, unionists, etc.

## Main Human Rights Affected:

Life, freedom and safety. To not be subject to torture or cruel or inhuman treatment.

05

Privacy and Digital Technologies.

## Typologies:

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

06

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 and quality services, and rights of the most vulnerable groups.

# Areas of potential impact on Human Rights Business Group

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07

Diversity, Equality, Inclusion.

## Typologies:

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

## Main Human Rights Affected:

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

08

Quality of Supply

## Typologies:

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

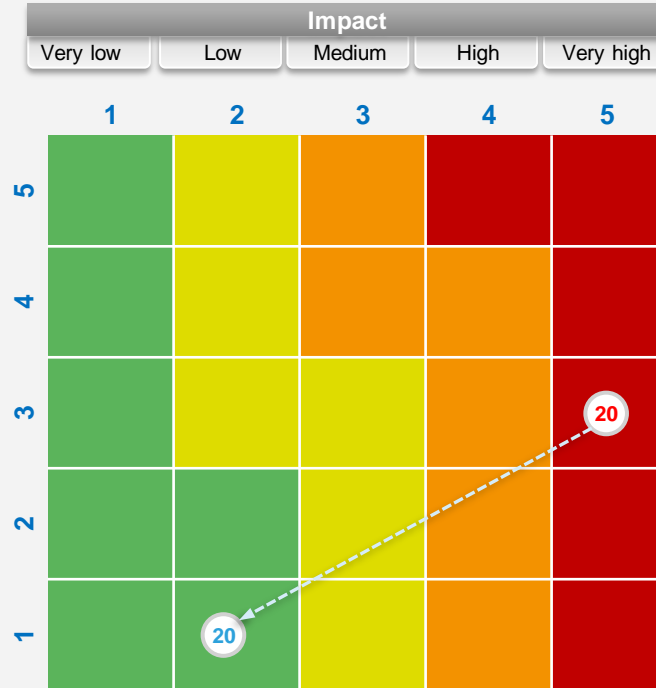
## Main Human Rights Affected:

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



# Human Rights Risk Management

Risk: Violation of human rights by GEB, employees, or a partner or contractor of GEB.



**IR#** Inherent Risk / Uncontrolled Risk Assessment

**CR#** Controlled Risk / Controlled Risk Assessment

Approval of the inclusion of the risk of human rights violations in GEB's strategic risk matrix (October 2022).

The Board conducts bimonthly follow-ups on this risk

Inclusion of human rights risks as a strategic risk in four subsidiaries (Enlaza, TGI, Conecta, and Cálidda) in 2023.

# Human Rights Mitigation Plans

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Among the processes carried out by the Group, which include the development of mitigation plans, the following are highlighted:

- **Communities:** The Group's guidelines for intercultural relations require the due diligence process to include 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:** They are regularly evaluated 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 periodically trains suppliers and contractors in human rights, diversity, equity, and inclusion, incorporating a termination clause in contracts with GEB and its subsidiaries for violations of human rights by a contractor. For additional information, please refer to the HSSE Manual [https://www.grupoenergibogota.com/en/content/download/33835/file/Manual%20HSSE\\_En.pdf](https://www.grupoenergibogota.com/en/content/download/33835/file/Manual%20HSSE_En.pdf)
- **Workers:** All subsidiaries have a Diversity, Equality, and Inclusion (DEI) Committee that ensures compliance with the Human Rights Policy and oversees the HR and DEI strategy. The Committee oversees and supports the implementation of HR and DEI prevention and mitigation strategies, which encompass employee training and awareness programs, as well as tools to ensure fairness and prevent discrimination in talent acquisition processes implementation of the gender equality management system "Equipares," etc. Additionally, GEB has established a Workplace Harmony Committee that addresses and manages workplace harassment complaints through an established protocol for this purpose: <https://www.grupoenergibogota.com/conoce-geb/talento-geb/comite-de-convivencia>



# Grupo Energía Bogotá



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