








# Risks and Controls in Human Rights Business Group

## Scope

Outlined below are the risks, controls, mitigation measures, and remedies concerning human rights for the designated "sites" aligned with the projects and operations of GEB companies: 1) In Colombia, this pertains to the energy transmission projects located in the three regions of the country (central, northern, and southwestern) and the natural gas transportation operation centers (eight operational infrastructures) and gas compressor stations (16 operational infrastructures); 2) In Peru, this applies to Lima and Callao, along with four provinces (Chincha, Pisco, Ica, Nasca); and 3) In Guatemala, this concerns the operational sites of the Conecta electric power transmission projects.



Generation	Transmission	Distribution	Natural Gas	
				
<b>4,392 MW</b> Installed Generation Capacity	<b>19,222 km</b> Transmission Network	<b>4.5 million</b> connections	Transportation <b>4,033 km</b> of pipelines	Distribution <b>4.3 million</b> connections

### Our Controlled Companies



# Human Rights Risk Matrices GEB and Subsidiaries

Implemented Processes to  
Mitigate Human Rights Risks



Grupo  
Energía  
Bogotá

*We improve lives  
through sustainable  
and competitive  
energy*

Yukpa Community (Serranía de Perijá) - Agustín Codazzi, Cesar

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

Potential Causes	Potential Consequences	Controls/Response Plans
1. Lack of a public declaration affirming commitment to human rights	Potential reputational damage, economic sanctions, disciplinary actions, criminal charges, asset loss due to compensation for damages, operational disruption	C1. Enact, publicize, and monitor adherence to the Human Rights Policy. C1. Establish a human rights due diligence system. C1. Develop communication protocols for human rights issues.
2. Contractors' failure to employ labor practices safeguarding human rights		C2. Provisions for contract termination upon human rights violations. C2. Human rights criteria in contractor assessments. C2. Inclusion of a human rights component in the "contract complexity matrix." C2. Criteria for human rights in subcontracting.
3. Conflicts arising from improper engagement with stakeholder groups		C3. Guidelines for engaging with communities. C3. Communication protocols for crisis situations with communities.
4. Involvement of GEB, its workers, or contractors in public order situations.		C.4. Manuals for community engagement. C.4. Human rights training for contractors.



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

Potential Causes	Potential Consequences	Controls/Response Plans
5. Actions by GEB impacting human rights	Reputational impact, economic sanctions, disciplinary actions, criminal penalties, financial losses due to damage repair, operational interruptions, and effects on GEB's standing in international standards (DJSI).	C.5 Human rights training plans for employees. C.5 Human rights training plans for critical contractors. C.5 Training plans on diversity, equality and inclusion for leaders and employees. C.5 Tools and processes to prevent discrimination in selection processes. C.5 Employee Relations Committee. C.5 Train the Employee Relations Committee on human rights and addressing claims.
6. Lack of information on Human Rights reports and claims (PCCs, etc.)		C.6 Reporting channels for human rights claims. C.6 Monitor and follow up on performance of the PCCs and reports.
7. Lack of preventive and corrective management of Human Rights issues		C7. Implementation of policies, tools, and indicators at the subsidiary level. C.7 Monitor human rights management at the subsidiaries. C.7. Policies: ECL (Extracontractual Civil Liability), Civil Liability, personal accidents, compliance, etc.

## Risk: Violation of human rights by ENLAZA GEB, its employees, or a partner or contractor

Potential Causes	Potential Consequences	Controls/Response Plans
1. Lack of a public declaration affirming commitment to human rights	Reputational impact, economic sanctions, disciplinary sanctions, criminal sanctions, asset loss due to impact remediation, and operational disruption.	C1. Enact, publicize, and monitor adherence to the Human Rights Policy. C1. Establish a human rights due diligence system. C1. Develop communication protocols for human rights issues.
2. Contractors lacking labor practices to ensure human rights protection.		C2. Provisions for contract termination upon human rights violations. C2. Human rights criteria in contractor assessments. C2. Inclusion of a human rights component in the "contract complexity matrix." C2. Criteria for human rights in subcontracting.
3. Conflicts arising from improper engagement with Inter groups		C3. Guidelines for engaging with communities. C3. Communication protocols for crisis situations involving communities.
4. Involvement of GEB, its workers, or contractors in public order situations.		C.4. Manuals for community engagement. C.4. Human rights training for contractors.

## Risk: Violation of human rights by ENLAZA GEB, its employees, or a partner or contractor

Potential Causes	Potential Consequences	Controls/Response Plans
5. Actions by GEB impacting human rights	Reputational impact, economic sanctions, disciplinary actions, criminal penalties, financial losses due to damage repair, operational interruptions, and effects on GEB's standing in international standards (DJSI).	C.5 Human rights training plans for employees. C.5 Human rights training plans for critical contractors. C.5 Training plans on diversity, equality and inclusion for leaders and employees. C.5 Tools and processes to prevent discrimination in selection processes. C.5 Employee Relations Committee. C.5 Train the Employee Relations Committee on human rights and addressing claims.
6. Lack of information on Human Rights reports and claims (PCCs, etc.)		C.6 Reporting channels for human rights claims. C.6 Monitor and follow up on performance of the PCCs and reports.
7. Lack of preventive and corrective management of Human Rights issues		C7. Implementation of policies, tools, and indicators at the subsidiary level. C.7 Monitor human rights management at the subsidiaries. C.7 Policies: ECL (Extracontractual Civil Liability), Civil Liability, personal accidents, compliance, etc.

## Risk: Violation of human rights by TGI, its employees or contractors

Potential Causes	Potential Consequences	Controls/Response Plans
1. Absence of a public commitment to respect human rights.	<ul style="list-style-type: none"> <li>• Effects on reputation.</li> <li>• Economic, disciplinary, and criminal sanctions.</li> <li>• Asset loss due to compensation for impacts.</li> <li>• Operational disruption.</li> <li>• Impact on GEB's standing in international standards (DJSI).</li> </ul>	Enact, publicize, and monitor adherence to the Human Rights Policy C1.
2. Contractors lacking labor practices to ensure human rights protection.		Establish a human rights due diligence system C1.
3. Conflicts arising from improper engagement with stakeholders.		Ensure provisions for contract termination upon human rights violations C2.  Evaluate contractors using human rights criteria C2.  Incorporate human rights criteria in subcontracting (clauses in contract drafts) C2.  Human rights risks in the service contracting risk matrix C2.
		Update and apply the protocol for engagement with communities and territorial actors C3.



Risk: Violation of human rights by TGI, its employees or contractors.

Potential Causes	Potential Consequences	Controls/Response Plans
4. Involvement of TGI, its workers, or contractors in public order situations.	<ul style="list-style-type: none"> <li>• Effects on reputation.</li> <li>• Economic, disciplinary, and criminal sanctions.</li> <li>• Asset loss due to compensation for impacts.               <ul style="list-style-type: none"> <li>• Operational disruption.</li> </ul> </li> <li>• Impact on GEB's standing in international standards (DJSI).</li> </ul>	Human rights training to contractors and employees C4. Human rights and conflict management training to communities C4.
5. Actions by TGI impacting human rights.		Human rights training plans for employees C5.  Human rights training plans for critical contractors C5.  Training plans on diversity, equality and inclusion for leaders and employees C5.  Tools and processes designed to prevent discriminatory practices in recruitment C5.  Follow-up human rights complaints through the Employee Relations Committee C5.  Train the Employee Relations Committee in human rights and addressing claims
6. Lack of information on Human Rights reports and claims (Rights of Petition, etc.)		Update and disseminate complaint channels focused on human rights issues C6.  Monitor and follow-up on the effectiveness of these channels and the human rights complaints received C6.
7. Weaknesses in preventive and corrective management of human rights issues C7.		Follow-up on management and implementation of human rights indicators C7.  Activate policies such as: Extracontractual Civil Liability (ECL), Civil Responsibility, personal accidents, compliance, etc. C7.

## Risk: Management of human rights by the company in labor practices and local communities

Potential Causes	Potential Consequences	Controls/Response Plans
1. Failure to identify gaps between internal policies and national and international human rights standards.	<ul style="list-style-type: none"> <li>•Business continuity, operational interruption, cancellation of licenses and permits.</li> <li>•Increase in legal liabilities, administrative and/or criminal sanctions.               <ul style="list-style-type: none"> <li>•Challenges in accessing external financing.</li> </ul> </li> <li>•Difficulties in accessing and sustaining human resources.               <ul style="list-style-type: none"> <li>•Effects on GEB's reputation and/or image.</li> </ul> </li> <li>•Negative impact on local communities due to increased conflict.               <ul style="list-style-type: none"> <li>•Remediation in response to potential human rights violations and asset loss due to reparations.</li> </ul> </li> </ul>	1, 2 Develop a due diligence process to identify, prevent, mitigate, and communicate potential impacts on human rights. Review by management of the effectiveness of implemented measures and the need for policy, procedure, and plan adjustments.
2. Lack of efficacy analysis in the implementation of policies and procedures that manage respect for human rights within the company's business operations, including contractors and subcontractors.		1, 2, 3 Implement an accessible and confidential complaint mechanism for employees and local communities to report potential human rights violations.
3. Company, employee, or contractor involvement in human rights violations.		<p>2, 3 Evaluate contractor risk concerning human rights, establish binding contractual clauses, and conduct periodic audits for compliance.</p> <p>1, 2, 3 Develop a training program on human rights for employees, contractors, and local communities.</p> <p>1, 2, 3 Manage community relations processes considering their human rights in the company's operations.</p> <p>1, 2 Develop a plan to address diversity, equity, and inclusion gaps aligned with the company's Human Rights Policy.</p>



# Cálidda

Risk: Other regulatory non-compliances (tax, labor, environmental, personal data protection, human rights violations, etc.) causing economic or reputational damage to the company

Potential Causes	Potential Consequences	Controls/Response Plans
1. Inadequate system for identifying governmental regulatory proposals.	<ul style="list-style-type: none"> <li>•Negative economic impact.</li> <li>•Reputational image damage to Cálidda.</li> <li>•Impact on obtaining a concession extension due to repeated non-compliance with applicable regulations.</li> <li>•Reputational image damage to Cálidda.</li> <li>•Severe violations of rights holders.</li> <li>•Irreparable impact of the generated effects.</li> <li>•Negative economic impact.</li> <li>•Loss of confidence by stakeholders.</li> </ul>	<p>C03: Review the status of ongoing and "new" (last 6 months) legal proceedings, define legal strategies, and determine actions to mitigate the risk of future contingencies and regulatory non-compliance that the company may encounter.</p> <p>C06: Review/update of the Regulatory Compliance Matrix: Review sources of regulatory and tariff issues to identify any news of amendments or proposed sectoral regulatory/tariff changes.</p> <p>C39: Follow-up and legal defense strategies.</p> <p>C45: Periodic review and update:            - Annual review of Calidda's Human Rights Policy.            - Biannual review of the Human Rights Risk Matrix.</p> <p><b>C46: Follow-up:</b>            - Monitoring and Follow-up ensuring compliance with contractual human rights clauses.            -Follow-up and Reporting potential human rights impacts.</p> <p><b>C47: Human Rights Training Plan:</b>            - Implement annual training plans: Each year, a training plan will be presented to employees and contractors, with semiannual reports of completed trainings (attendance lists, presentations, etc.).</p>
2. Ambiguous interpretation of laws.		
3. Lack of documentation supporting the traceability of issued regulations.		
4. Commercial agreements executed without supporting documentation (contracts).		
5. DS 001-2022-TR Amendments to the outsourcing regulations: Potential differing interpretations by authorities could lead to: Fines, reputational damage to the company.		
<b>6.Absence of a corporate policy and human rights due diligence systems.</b>		
7. Lack of preventive contractual instruments against human rights violations by contractors.		
8. Insufficient human rights training for teams (employees and contractors).		
9. Rapid growth of the Non-Banking Financial (NBF) business model.		

# Human Rights Mitigation Plans

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

**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. When the evaluation is negative, they must present improvement plans to the Group. 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.grupoenergiabogota.com/en/content/download/33835/file/Manual%20HSSE\\_En.pdf](https://www.grupoenergiabogota.com/en/content/download/33835/file/Manual%20HSSE_En.pdf)

**Workers:** All subsidiaries have Diversity, Equity, and Inclusion (DEI) Committees that ensure compliance with the Human Rights Policy and oversee the HR and DEI strategy. The Committee approves and monitors prevention and mitigation plans concerning HR and DEI, including training and raising awareness among employees, tools to ensure impartiality and non-discrimination in the talent selection processes: <https://www.grupoenergiabogota.com/en/sustainability/social-performance/human-rights>. GEB also has a Workplace Harmony Committee that receives and handles workplace harassment complaints, following the established procedures for this purpose: <https://www.grupoenergiabogota.com/conoce-geb/talento-geb/comite-de-convivencia>



# Human Rights Remediation Plans

In the cases in which Grupo Energía Bogotá identifies that it has caused or contributed to causing adverse impacts on the human rights of others, the Group will provide or cooperate reasonably in offsetting or remediating the impacts through the provided complaint mechanisms or within the framework of any other legitimate process.

In scenarios of potential human rights impacts, any individual believing their rights have been infringed can access established channels to initiate preventive, mitigating, or corrective actions. These measures may also be implemented in cooperation with third parties, including the state, local authorities, and civil society organizations. Moreover, a differentiated approach will be applied to the measures endorsed. **The range of possible remedial actions includes apologies, restitution, financial or non-financial compensations, and punitive sanctions (whether criminal or administrative, such as fines), along with damage prevention through measures like injunctions or assurances of non-recurrence.**

For more details, see:

- GEB Risk Policy: <https://www.grupoenergiabogota.com/en/content/download/31772/file/Risk%20Management%20Policy.pdf>
- GEB's Ethics Channel (PCCS): Through the Ethics Channel, GEB receives and manages ethical dilemmas, reports, or complaints from internal and external stakeholders about issues that may deviate from or affect the company's ethical framework. In 2023, an exclusive category was added to the ethics channel concerning potential human rights impacts. The channel actively monitors and tracks the performance of PCCS and human rights complaints: <https://www.grupoenergiabogota.com/en/geb-group/ethics-and-compliance-program/ethics-channel>
- GEB website (Human Rights section): <https://www.grupoenergiabogota.com/en/sustainability/social-performance/human-rights>
- GEB Code of Ethics: <https://www.grupoenergiabogota.com/en/geb-group/ethics-and-compliance-program/code-of-ethics>
- Guidelines for Intercultural Relationships: [https://www.grupoenergiabogota.com/en/content/download/33987/file/Intercultural%20Relations%20Guidelines%20\(3\)%20\(2\).pdf](https://www.grupoenergiabogota.com/en/content/download/33987/file/Intercultural%20Relations%20Guidelines%20(3)%20(2).pdf)



Grupo Energía Bogotá



Cálida



TGI  
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# Grupo Energía Bogotá



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