

1. OBJECTIVE

Define the activities to be developed to effectively address complaints of alleged workplace and/or sexual harassment in any of its modalities in accordance with our zero tolerance declaration, thus generating a space of inclusion for all TGI employees.

1.1. DECLARATION

Transportadora de Gas Internacional S.A. ESP, rejects any form of workplace or sexual discrimination, violence or harassment and promotes the right to equality in employment and occupation, in accordance with the Corporate Diversity and Inclusion Policy, and/or whichever document modifies or replaces it.

2. SCOPE

This procedure starts when the employee reports through the ethics line and/or e-mail of the TGI Workplace Coexistence Committee, or informs any of its members of the existence of a presumed conduct of workplace and/or sexual harassment of which he/she may be a victim, until the management report is prepared.

OVERALL CONDITIONS

- The functional areas and roles identified in this document are based on the organizational structure in place at the time of this document's approval. If the structure changes, those changes shall be assumed by those who take their place.
- Develop the appropriate activities for document and information asset management, where applicable, in accordance with corporate policies, procedures, manuals and instructions established in the Integrated Management System (IMS, abbreviation in Spanish SGI – Sistema de Gestión Integrado).
- The management of cases of alleged workplace and/or sexual harassment shall be carried out with strict impartiality, without discriminatory criteria based on sex, gender, gender identity, age, origin, among others, when addressing complaints of alleged workplace harassment, thus creating an atmosphere of empathy and awareness.
- The channels defined by TGI to receive complaints of possible workplace and/or sexual harassment are: the Ethics Channel (01800-012-54-70) or the workplace Coexistence Committee mailbox (comite.convivencia@TGI.com.co).
- Complaints of possible workplace harassment are received from employees who are directly related to the company.
- The coexistence agreements established, derived from a situation of workplace harassment, must be framed by the internal work regulations of TGI.
- The employee may provide any evidence he/she may have to support his/her complaint to the Coexistence Committee or the Ethics Hotline.
- The filing and treatment of information related to a complaint of alleged workplace harassment should be handled according to the guidelines set forth in Law 1010 of 2006 and Law 1581 of 2012.
- The evidence that can be provided by the collaborator to support any situation of alleged workplace harassment are: emails, WhatsApp conversations, printed or handwritten documents, witnesses and videos from security cameras, support of requests outside the framework of their work functions.
- All complaints received for alleged workplace harassment must be handled within the times established in numeral 4 of this document, processed in a Coexistence Committee session. In accordance with TGI's Internal Work Regulations, this Committee shall ordinarily meet once every three (3) months. The Committee shall create an inclusive and safe space for all workers.
- When the Coexistence Committee receives repeated complaints about the same employee, the case may be referred to Workplace Relations.
- A record shall be kept of each case received by the Coexistence Committee, detailing the commitments made by the parties and the progress made.
- Complaints received from contractors by the Coexistence Committee must be forwarded to the contract auditor in order to be processed by the contractor's Coexistence Committee.

- The Coexistence Committee must prepare a quarterly report listing all the cases received for alleged workplace and/or sexual harassment and how many of these were closed with or without agreement, and must record the recommendations and actions of each case.
- The Coexistence Committee must ensure the confidentiality of the details of the facts at all times and, especially, when the subject matter of the case or cases requires presentation to the Diversity, Equity and Inclusion Committee, for knowledge and recommendations as applicable. Guaranteeing inclusive spaces where workers feel their dignity is protected.
- If either or both of the parties involved (complainant and respondent) request witnesses, they shall be called individually so that the case can be presented to them and they are able to state their corresponding case.
- The company guarantees that the Coexistence Committee is a space for the protection of human dignity where freedom of expression, sexual orientation and gender identity are respected and accepted, without prejudice, but rather provide a healthy and safe environment.

PARAGRAPH: For cases that involve affectation of sexual freedom and/or alleged sexual harassment, there is no need to approach the parties involved (in order to avoid possible re-victimization); therefore, there is no need for a joint summons or space for dialogue between the workers involved, as provided for in sections 2.1.3. and 3.3. of the Coexistence Regulations (or the document that modifies or replaces it).

3. DEFINITION OF TERMS

3.1. WORKPLACE HARASSMENT: Any persistent and demonstrable conduct, exercised on an employee by an employer, a boss or immediate boss, a co-worker or a subordinate, aimed at instilling fear, intimidation, terror and anguish, causing work-related harm, generating demotivation at work, or inducing resignation from work. (Source: Law 1010 of 2006).

3.2. SEXUAL HARASSMENT: Law 1257 of 2008 defines Sexual Harassment when it occurs in the workplace. It is defined in the same law for such purpose: Article 29, by means of which Article 210 A is added to Law 599 of 2008.

"Article 210 A.

Sexual harassment. Whoever for his own benefit or that of a third party and taking advantage of his manifest superiority or relations of authority or power, age, sex, workplace, social, family or economic position, harasses, persecutes, or besieges another person physically or verbally, for non-consensual sexual purposes, shall be imprisoned from one (1) to three (3) years".

Law 1257 of 2008 introduced in the Colombian legal system mechanisms to eradicate the cycles of sexist violence that reproduce Sexual Harassment (SH – abbreviation in Spanish AS – Acoso Sexual) against working women and which constitutes a manifestation of the shall of the Colombian State, however, these prohibitions apply to all persons regardless of their sexual condition.

3.3. COMPLAINTEE: TGI worker against whom a complaint has been filed for alleged intimidation, fear, terror and distress.

3.4. COMPLAINANT: TGI worker who considers that within the context of the workplace relationship he/she may be immersed in alleged conduct that violates his/her human dignity. It may refer to any worker, regardless of his/her sexual orientation, sexual freedom, population to which he/she belongs, beliefs or conditions.

3.5. COEXISTENCE COMMITTEE: Group of persons acting on behalf of the workers and the employer for the purpose of receiving and handling complaints related to workplace and/or sexual harassment. (Source Resolution 652 of 2012).

4. DEVELOPMENT OF ACTIVITIES

ACTIVITY WHAT	HOW / WHERE	RESPONS. WHO	CONTROL POINTS	REGISTRY
<p>4.1. Report a situation of alleged workplace and sexual harassment</p>	<p>Contact the Ethics Channel line (01800-012-54-70) or the Coexistence Committee email (comite.convivencia@TGI.com.co) to expose a situation of alleged workplace and/or sexual harassment, reporting the situation through the workplace harassment complaints/denunciation form.</p>	<p>Collaborators of TGI (COMPLAINANT) victim of the conduct</p>	<p>Receipt of the complaint</p>	<p>Ethics hotline or e-mail Coexistence Committee</p> <p>F-GTH-017 File complaints of Workplace or Sexual Harassment; or submit suggestions.</p>
<p>4.2. Receive the complaint or denunciation through the Ethical Channel Line redirection or by e-mail</p>	<p>Receive complaints/denunciations of alleged workplace and/or sexual harassment.</p>	<p>Transportadora de Gas Internacional Workplace Coexistence Committee</p>	<p>Review of the complaint</p>	<p>Ethics hotline or e-mail Coexistence Committee</p> <p>F-GTH-017 File complaints of Workplace or Sexual Harassment; or submit suggestions.</p>
<p>4.3. Contact partner</p>	<p>In accordance with the provisions of the Coexistence Committee Regulations (R-GTH-004), paragraph 3.3, the Secretary of the Committee shall summon the complaining employee in order to request more detailed information on the denounced facts.</p> <p>If deemed appropriate, call witnesses, or the person(s) involved in the complaint.</p> <p>From the day following receipt of the complaint referred to in activity 4.2, the committee has 8 working days to contact the employee who filed the complaint.</p> <p>Witnesses may not be called in cases of alleged sexual harassment or infringement of sexual freedom.</p>	<p>Secretary of the Transportadora de Gas Internacional Workplace Coexistence Committee</p>		<p>E-mail and/or phone line provided</p>

ACTIVITY WHAT	HOW / WHERE	RESPONS. WHO	CONTROL POINTS	REGISTRY
<p>4.4. Analyze the case presented by the employee, define competence and inform the complainant.</p>	<p>In accordance with the provisions of the Coexistence Committee Regulations (R-GTH-004), numeral 5.2, the committee shall define its competence, and to this end shall proceed to:</p> <ol style="list-style-type: none"> Analyze the information provided by the employee and determine whether the case involves alleged workplace and/or sexual harassment. Inform the employee of the legal instances available to escalate the case. In particular, if alleged sexual harassment is identified, the complainant must be informed that he/she has the possibility of reporting these facts to the Attorney General's Office and provide accompaniment. If there is a case of alleged workplace harassment, the company has mechanisms in place to prevent workplace harassment, which are established by law and incorporated in the internal work regulations. Thus, an analysis must be made as to whether the case involves a disciplinary breach that merits referral to the Workplace Relations Sub-Directorate (abbreviation in Spanish SRL – Subdirección de Relaciones Laborales) or the Sub-Directorate that takes its place. Determine whether the reported conduct could fall within the scope of exclusion due to race, sexual identity or gender. <p>In order to comply with the review of the Committee's competence, the Committee may rely on a professional expert in the field, who may provide technical and legal assistance.</p> <p>If the Committee concludes that it does not have jurisdiction, it shall so inform the interested party by means of a confidential letter.</p>	<p>Transportadora de Gas Internacional Workplace Coexistence Committee</p>	<p>Review of the case, record in the registry</p>	<p>Matrix Workplace Coexistence Committee and e-mail and/or phone call to the number provided.</p>

ACTIVITY WHAT	HOW / WHERE	RESPONS. WHO	CONTROL POINTS	REGISTRY
	<p>If the Committee considers that there is a possible disciplinary offense, they shall redirect the case to the Sub-Directorate of Workplace Relations or whoever takes its place, and shall inform the interested party by means of a confidential letter.</p> <p>If the conclusion is that the matter falls within the competence of the Committee, the Committee shall proceed to the next stage of the procedure.</p> <p>The response time for this activity is 8 working days, following contact with the employee who filed the complaint (activity 4.4.).</p>			
<p>4.5. Initiate and process the evidentiary stage</p>	<p>In accordance with the provisions of the Coexistence Committee Regulations (R-GTH-004), numeral 5.2, the committee shall proceed to the Evidentiary Aspects Stage, and to that end shall proceed to:</p> <p>Hear the parties involved individually about the facts that gave rise to the complaint.</p> <p>Schedule meetings with the purpose of creating a space for conciliatory dialogue between the parties involved, promoting mutual commitments to reach an effective solution to the controversies.</p> <p>The evidentiary sessions should be conducted with the understanding that both the employee filing the complaint and the alleged perpetrator are in a scenario where the goal (in the first instance) is to build negotiated and conciliatory solutions to achieve a good working environment in the Company.</p> <p>Summons to the parties shall be made by the secretary, in accordance with the provisions of section 3.3 of the Coexistence Committee Regulations (R-GTH-004).</p>	<p>Transportadora de Gas Internacional Workplace Coexistence Committee</p>	<p>Response time to complainant</p>	<p>E-mail or phone call to the number provided</p>

ACTIVITY WHAT	HOW / WHERE	RESPONS. WHO	CONTROL POINTS	REGISTRY
	<p>The response time for activity 4.5 and 4.6 (when taken together) is a maximum of two (2) months.</p> <p>Section 4.5. Does not apply in cases of alleged sexual harassment or violation of sexual freedom.</p>			
<p align="center">4.6. Provide recommendations and follow up</p>	<p>In accordance with the provisions of the Coexistence Committee Regulations (R-GTH-004), numeral 5.2, the committee shall proceed to the Recommendations Stage, and to this end shall proceed to:</p> <p>To build the conciliatory formula or the recommendation that is deemed appropriate to resolve the situations submitted to its consideration, and to communicate it in writing to the parties, as well as to the Vice-presidency for Human Resources and Administrative Management (or whoever replaces it), and in that order:</p> <ul style="list-style-type: none"> ▪ Formulate an improvement plan which is socialized between the parties, in order to build, renew and promote workplace coexistence, guaranteeing a principle of confidentiality in all cases. ▪ Follow up on the commitments made by the parties involved in the complaint, verifying their compliance with the agreement. <p>Activity 4.7 shall be carried out in the following cases: no agreement is reached between the parties, the recommendations made are not complied with or the conduct continues.</p> <p>The response time for activity 4.5 and 4.6 (when taken together) is a maximum of two (2) months.</p>	<p>Transportadora de Gas Internacional Workplace Coexistence Committee</p>	<p>Response time to complainant</p>	<p>Matrix Workplace Coexistence Committee / email</p>
<p align="center">4.7.</p>	<p>In accordance with the provisions of the Coexistence Committee Regulations (R-GTH-004), numeral 5.2, the committee shall refer the</p>			

ACTIVITY WHAT	HOW / WHERE	RESPONS. WHO	CONTROL POINTS	REGISTRY
Refer Complaint to Senior Management and proceed to close the case	complaint to the company's senior management, close the case and inform the employee that he/she may file the complaint before the workplace inspector or sue before the competent judge.	Transportadora de Gas Internacional Workplace Coexistence Committee	Response time to complainant	Matrix Workplace Coexistence Committee / email
4.8. Prepare quarterly reports	In accordance with the provisions of the Coexistence Committee Regulations (R-GTH-004), paragraph 5.2, the committee shall prepare quarterly reports on the Committee's management, including statistics on complaints, follow-up of cases and recommendations, which shall be submitted to the company's Senior Management.	Transportadora de Gas Internacional Workplace Coexistence Committee	Response time to complainant	Workplace Coexistence Committee Matrix / e-mail / Quarterly Report

ANNEXES

F-GTH-017 File complaints about Workplace and/or Sexual Harassment, or make suggestions.